



Equality Impact Assessment

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement and Guidance and Checklist Notes, and undertake our online training on Equality and Diversity and EqIA. These, along with further information and resources, are available at www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment

Equality impact assessment for the new University of Edinburgh website content management system

A. Policy or Practice (name or brief description):

Development of a new Content Management System (CMS) using the open source framework Drupal to replace the current Polopoly Content Management System. Polopoly is used by a significant number of University staff every day (100 – 150 EASE logins daily) and there are over 700 trained users.

Update Feb 2018: this is a review and update of the original EqIA. The Content Management System EdWeb has now been fully operational for over 2 years. Over 1000 members of staff have been trained to use the EdWeb CMS. The next significant development will be the move to next version of Drupal – version 8.

In addition to this we continue to develop the EdGEL (Edinburgh Global Experience Language) design framework which controls the delivery of the front-end website to 40+ million visitors annually. This framework follows global standards including accessibility. There are also separate EqIAs for EdGEL and for the front-end website.

Update April 2019 - this is a review and update of the original EqIA. There are over 1600 trained users and there are now over 450 websites.

B. Reason for screening (delete as applicable):

- **Proposed new policy/practice**
- ~~Proposed change to an existing policy/practice~~
- ~~Undertaking a review of an existing policy/practice~~
- ~~Other (please state):~~

Update 2018: Update to existing EqIA

Update 2019: Update to existing EqIA

C. Person responsible for the policy area or practice:

Name: **Bruce Darby**

Job title: **Project Manager**

School/service/unit: **University Website Programme, Information Services**

Update 2018: Bruce Darby, Project Manager, Website and Communications, Information Services

Update 2019: Bruce Darby, Project Manager, Website and Communications, Information Services

D. Screening Analysis

1. Does the policy or practice affect primary or high level functions of the University? **YES**
2. Is the policy or practice relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' set out in the introduction above)? **YES**
3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqlA? **YES**

E. Screening outcome

Equality Impact Assessment required: **Yes**

The EqlA will be conducted by Bruce Darby and edited as the project develops and goes live.

Update 2018 – Review conducted by Bruce Darby, Project Manager, Website and Communications. The EdWeb CMS has now been fully operational for over 2 years.
Update 2019 – Review conducted by Bruce Darby, Project Manager, Website and Communications.

F. Sign-off

Screening undertaken by (name(s) and job title(s)): **Bruce Darby, Project Manager, University Website Programme**

Accepted by (name): **Dawn Ellis, Director, University Website Programme**

Date: **04/09/2015**

UPDATE – Accepted by (name): Stratos Filalithis, acting Head of Website and Communications, who has accepted this EqlA update.

Date: 09/02/2018

UPDATE 2019 – Accepted by: Stratos Filalithis, Head of Website and Communications, who has accepted this EqlA update.

Date: 22/05/19

G. Equality Impact Assessment

Before assessing the policy/practice, ensure that you have a clear understanding of the purpose of the policy or practice, the context, the intended beneficiaries and the results aimed for.

In answering the questions below:

- Bear in mind that the extent of EqlA should be proportionate to the relevance of the policy/practice to equality. It may not be practicable or necessary to answer every question or address every potential scenario.
- Focus mainly on aspects of the policy/practice that are most relevant to the question, to ensure most attention is given to the most important areas.
- Relate answers to consideration of the available evidence and address any gaps or disparities revealed, where feasible without disproportionate effort. For new policies, assess potential impact.
- Describe any action identified to address any issues highlighted.
- Where there is potential for adverse impact, but the policy/practice will still be applied, indicate the rationale for that decision.

Initial/partial EqlA: in some circumstances - particularly for new policies/practices – there may be limited information on which to base EqlA. In these cases, the EqlA should be carried out to the extent possible and should identify arrangements for monitoring/investigation of equality impact and for fuller EqlA in future.

Wholly positive impact: Some policies/practices may be viewed as having only positive equality impact. For these, consideration should still be given to ensure that no adverse impact is overlooked and to ensure that full advantage is taken of the positive impact, e.g. through effective communication. However, the effort involved in carrying out EqlA should not be excessive.

1. Overview. Indicate the current status of the policy/practice or the stage of development/review. Also note any general comments here regarding the relevance and significance of the policy/practice to equality. Which aspects of the policy/practice are particularly relevant (which should be the main focus for EqlA)? On what aspects of equality does the policy/practice particularly impact?

The University of Edinburgh is developing a new Drupal based content management system (CMS). A content management system is a web browser based piece of software used to create, edit and manage websites. This new CMS will be used by University of Edinburgh staff to create web sites. A separate EqlA is written to cover the front end website, its design and its content. Sites are being migrated from the old CMS Polopoly into the new CMS EdWeb in a phased approach. During this process the website pages are being updated to a new design.

The new Drupal CMS is currently in development. It is being implemented in a phased approach with new functionality and updates being released periodically over time. While the current project is finishing in August/September 2015 a continuous process of improvement is being planned for the future.

As disability is the main protected characteristic most likely to be impacted by the policy the focus of the EqlA will be on the accessibility of the system.

UPDATE 2018 - The EdWeb CMS has now been fully operational for over 2 years. Over 1000 members of staff have been trained in the new system. There were 5 phases of development of the CMS and 5 phases of migration moving sites from the Polopoly CMS to the EdWeb CMS. There is now over 300 websites live and in full operation in EdWeb. As expected a continuous program of improvement is

in place – this takes the form of full IS Application projects, collaborative development with developers from Website and Communication and Code Sprints. The plan is to expand this to more business units around the University.

UPDATE 2019 - The EdWeb CMS has now been fully operational for over 3 years. Over 1600 members of staff have been trained in the new system. There is now over 450 websites live and in full operation in EdWeb.

- While many sites continue to operate outside of EdWeb there have been a steady increase in business units joining EdWeb.
 - A continuous program of improvement is in place – this takes the form of full IS Application projects, collaborative development with developers from Website and Communication.
 - However this effort will be reduced as the CMS reaches the end of its life and projects start to build a new CMS using Drupal version 8. All content and websites will be migrated to this new CMS by 2021.
 - A Web Strategy was proposed and accepted in late 2018 and includes accessibility as one criteria that needs governance over the whole University web estate. The EdWeb CMS will continue to deliver sites that are as accessible as possible. Information on the University Web Strategy - <https://www.wiki.ed.ac.uk/x/yJBZFQ>
 - A new Head of Web Strategy has now been appointed for an additional 2 year post starting May 2019. Processes are being put in place to govern the University’s web estate in order to continue to lower any risk in relation to non-compliance, for not fulfilling its obligations to certain legislation or that could damage its reputation.
 - A more flexible web publishing service will be created alongside a website procurement framework to enable more sites that are currently outside the EdWeb CMS to use these central services ensuring the accessibility of the software to create sites by University staff as well as ensuring the accessibility of the content created.
 - There is an overlap between the EqlA for the EdWeb CMS and the EqlAs for the University website (which is created by the EdWeb CMS) and the EdGEL Design Framework (which delivers the design look and feel of the University website) so this EqlA should be reviewed alongside these.
2. To which equality groups is the policy/practice relevant? Policies/practices applying to substantial groups of students or staff will be relevant to all equality groups, which should be noted. However, also indicate any equality groups for which the policy/practice is particularly relevant, and why.

The protected characteristics under the Equality Act are (delete any that are not relevant):

- Age
- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity

- marriage or civil partnership¹

In answering the questions below consider each of these equality groups. As part of this, consider diversity within, as well as between groups (e.g. different disabilities, different racial groups). Consider the implications of combinations of protected characteristics e.g. issues of relevance to women may vary once race, religion and age are taken into consideration. Also consider the impact on those with caring/family responsibilities (which statically has been shown to impact more on women).

The new CMS does have the potential to impact on all 9 protected characteristics as it will affect all staff who edit content on the web, however we believe the only real impact will be on disability and race.

The equality groups for which the policy/practice is particularly relevant are disability and race. This is because the new design may affect how disabled users access the content management system software using assistive technology such as voice recognition software, screen readers or screen magnification software. We will ensure as far as possible that the new content management system promotes and facilitates compliance with the Web Content Accessibility Guidelines version 2 (<http://www.w3.org/TR/WCAG20/>).

Race is a relevant characteristic in that the software and the majority of the site is in English but English is the main teaching language of the University and there is an expectation that web editors would be fluent in English because of this.

All content added to the website must not discriminate against any of the protected characteristics. Any content that was found to discriminate against any of the protected characteristics would result in severe disciplinary action. The University vision is a continuing commitment to equality and diversity for both students and staff. The University has a single equality strategy to ensure that equality and diversity are guiding principles in our pursuit of academic excellence. The introduction of this strategy coincides with the implementation of the Equality Act 2010 and builds on its principle of integrating equality and diversity in policy and practice.

We also have a new University web accessibility policy which we feel will have a positive impact on the website and help to ensure that the new design will be and continue to be accessible as possible to disabled users. The policy is publically available from <http://www.ed.ac.uk/about/website/accessibility>.

Staff adding content to the website using EdWeb will have to comply with the University Web Accessibility Policy. There will continue to be a prominent feedback mechanism on every page. Staff at the University are aware of their obligation to provide reasonable adjustments when requested – e.g. content in an alternative format.

Equality and Diversity is very much a part of the University's strategic plan. The University's Equality and Diversity strategy can be viewed at <http://www.ed.ac.uk/equality-diversity/about/strategy-action-plan>. Equality and widening participation is one of the strategic themes of the University's strategic plan and can be seen on page 34 of the strategy document at <http://www.docs.sasg.ed.ac.uk/gasp/strategicplanning/201216/StrategicPlan201216.pdf>.

The objectives of the theme include embedding equality, inclusion and diversity as fundamental principles throughout our community with strategies of ensuring staff have appropriate training and information in equality areas to prevent discrimination, make

¹ Note: only the duty to eliminate discrimination applies to marriage and civil partnership. There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect.

reasonable adjustments and promote equality of opportunity and also to ensure staff and students with particular needs have access to appropriate facilities and support.

Update 2018 – A number of actions will need to happen to ensure that the Content Management System stays as accessible as possible:

- A project is currently in progress to plan out the upgrade of the CMS from Drupal 7 to Drupal 8.
- Drupal 8 has a number of features that will improve the accessibility of the CMS e.g. inline error messages for the editorial interface of the CMS. So we expect some improvements to accessibility to happen just by upgrading the system.
- An accessibility audit needs to take place of the full CMS. This will use the Web Content Accessibility Guidelines version 2 AA as a standard
- While there have been no complaints or issues raised by any member of staff it has been recognised that some areas of the CMS interface are not as accessible as they could be. This will be assessed following the accessibility audit and addressed during the move to Drupal 8.
- There have been no complaints or issues raised related to any of the other protected characteristics either.

Update 2019 – The move to Drupal 8 is still ongoing. All of the above is still relevant.

Some accessibility issues have been identified in the current CMS and while there have been no complaints or issues raised by any member of staff these will be replaced during the project to move to Drupal 8.

Some examples of accessibility issues are as follows;

- The Scald asset manager is not fully keyboard accessible. It is difficult to interact with the slide out functionality using the keyboard. The Scald interface is not very accessible using a screen reader as some labels are not read out.
- Lack of a spellchecker in the rich text editor due to various complex issues.
- The functionality to insert a line break between or at the end of some content is difficult to see for people with any visual impairment
- The plan is to fully replace these with more accessible functionality in Drupal 8.

3. What evidence is available about the needs of relevant equality groups? E.g. information/feedback from equality groups or other stakeholders, involvement or research with equality groups or individuals, equality monitoring data, service monitoring data, information for other similar policies/practices, staff surveys, research reports, demographic information, audit, inspection or management reports and recommendations.

Where are the gaps in evidence? If there is insufficient information to properly assess the policy, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the policy/practice. Note: the resources put into collecting evidence should be proportionate to the relevance of the policy/practice to equality.

Although there has been no significant feedback or complaints from disabled users, or related to any of the other 8 protected categories, we will continue to monitor this.

All feedback from users will be gathered and analysed to note any potential unexpected positive or negative impacts that need to be addressed.

A number of stakeholders were asked to contribute to collecting feedback:

- Student Disability Committee and its Technology and Information Subgroup which includes student representatives,
- Information Services Disability Information Officer
- The Disabled Computing Support group who support disabled students.

These groups include disabled staff users that have provided us with feedback. At present we feel we have sufficient evidence to proceed.

The University Website Programme has gone through a significant requirements gathering process with its web publishing community. No significant issues were raised during this process.

We have a questionnaire we circulate to all staff who are added as users to the new CMS and a question will be added to this asking for specific issues or difficulties in using the new CMS.

We have the Web Content Accessibility Guidelines version 2 AA as a standard.

Update 2018 – A number of actions will need to happen to ensure that the Content Management System stays as accessible as possible:

- **Over 1000 members of staff have been trained to use EdWeb. We have a very experienced trainer who encourages users to give feedback on using the EdWeb CMS. No issues have been reported.**
- **A survey of all EdWeb CMS users (2018 staff survey) should be launched to specifically look at gathering any accessibility issues of the CMS so that these can be addressed during the migration from Drupal 7 to Drupal 8. This survey will be launched in February 2018 and the results shared with the following committees:**
 - **Student Disability Committee and its Technology, Information and Communication Subgroup which includes student representatives.**
 - **Disability, Accessibility and Technology Advisory Group**
 - **Information Services Disability Information Officer**

The survey should also cover the accessibility of training and guidance material as well as a possible source of recruitment of disabled members of staff for some user testing.

Update 2019 – Repeat staff survey (April 2019 - this survey needs to be sent out to all editors) to assess impact of any accessibility issues in EdWeb CMS. There were no reports of any complaints or issues by staff using the EdWeb CMS or requests for reasonable adjustments. We have continued to train hundreds more staff and no critical issues have been raised during these training sessions. However there are some accessibility issues which have been listed in the section above.

4. Might the application of this policy/practice lead to discrimination, harassment or victimisation? Might it result in less favourable treatment for particular equality groups or give rise to indirect discrimination?

We do not foresee that the rollout of this new content management system would lead to any forms of prohibited conduct.

Update 2018 – we do not believe that the CMS has led to or will lead to any forms of prohibited conduct.

Update 2019 – we do not believe that the CMS has led to or will lead to any forms of prohibited conduct.

5. Are reasonable adjustments built in where they may be needed?

If a member of staff could not use the CMS the University would need to look at making reasonable adjustments to rectify this. This could take a number of different approaches but would include the following:

- Adapting the software to allow the member of staff to use the software. This would be our preferred option. However other temporary measures may be needed until those changes had been made.
- Allocating a member of staff to help perform certain tasks. It's unlikely that the software would be impossible to use but some tasks e.g. complex site reorganisation could be completed by helpline staff, University Website Programme staff, or work colleagues. This would be no different in how certain tasks are completed for members of staff currently.
- Allocating a different task to the member of staff with no penalisation to the original member of staff

Update 2018 – There have been no reports of any increase in demand for reasonable adjustments to using the EdWeb Content Management System. However we should be more proactive in reviewing this demand and the web publishing community will be surveyed (2018 staff survey) to see if there has been any requests for adjustments. There have been no requests for reasonable adjustments either through the IS Helpline, or to our team directly or to the website lead publishers who were contacted by email.

Update 2019 – There have been no reports of any increase in demand for reasonable adjustments to using the EdWeb Content Management System. Staff survey to be repeated in April 2019. There have been no requests for reasonable adjustments either through the IS Helpline, or to our team directly or to the website lead publishers who were contacted by email.

6. Does the policy/practice contribute to advancing equality of opportunity²? Will it help to:

- remove or minimise disadvantage
- meet the needs of different equality groups
- encourage increased participation of particular groups
- take account of disabled people's impairments?

The new system has taken accessibility into consideration from the beginning. Our expectation is that the new CMS will be easier for all users.

As the website content management system is managed centrally it is easier to control accessibility issues from the outset but also to respond quickly to any issues. We will use the new system to promote the web accessibility policy at every opportunity to give out a strong message that the University enforces accessibility to meet the needs of different

² This question does not apply to the protected characteristic of marriage or civil partnership

equality groups. It will also lead to the provision of support, training, documentation and guidance on how to implement web accessibility so that when a web site is built it will always take account of a disabled person's impairments. It is hoped that as the new system is more accessible than the previous system that more disabled users especially those who use assistive technology may become web editors.

UPDATE 2018 - The EdWeb CMS has now been fully operational for over 2 years. Over 1000 members of staff have been trained in the new system. As expected the CMS is largely seen as being much easier to use than the previous system Polopoly. This has allowed us to cut the length of our CMS training by 25%. We also continue to promote the Web Accessibility Policy and have taken part in a pilot project to look at addressing the accessibility of web resources through the provision of a service for video subtitling.

Update 2019 – In addition to the above a web strategy was proposed and accepted in 2018 with a new head of web strategy being appointed in May 2019. Accessibility will be a part of this governance remit.

7. Is there an opportunity in applying this policy/practice to foster good relations between people in any protected group and those who are not³? Will it help to tackle prejudice and/or promote understanding?

We will continue to promote accessibility as part of our training and support for the web publishing community which we feel will continue to demonstrate the seriousness by which Edinburgh University takes the issues of Equality and Diversity and in this case in particular the needs of disabled user and the desire to make the websites they use as accessible as possible and to mainstream as many adjustments as possible. We will use the roll out of the new system to promote and highlight the Web Accessibility Policy and supporting guidance.

Update 2018 –

There have been a number of presentations at the Web Publishing Community sessions highlighting web accessibility and the University Web Accessibility Policy in particular. This needs to be repeated during 2018.

Update 2019 - Presentations continue at Web Publishing Community (WPC) sessions as part of our regular CMS update e.g. [Feb 2019](#), [Nov 2018](#), [Oct 2018](#) New subtitling pilot project started and a comms strategy is being create to disseminate these results. (See Nov WPC session above)

Presentation to Web Governance Group in March 2019 to raise awareness of the new legislation that has come into force - Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. This highlights the need for a web accessibility statement and for web site resources e.g. video to be accessible as well as site content. EdWeb does ensure that all pages have a link to our web accessibility statement from the global footer. This statement is reviewed every 6 months. It looks likely that an official statement template will be published by the UK government. Once this is released the EdWeb statement will need to be updated to comply. Also any known accessibility issues must be reported in the statement so this is currently outstanding.

³ This question does not apply to the protected characteristic of marriage or civil partnership.

8. Is there evidence (or an expectation) that people from different equality groups have different needs or experiences in relation to the policy/practice? If so, what are they?

Disabled users will expect the content management system and the website to be accessible and comply with the Web Content Accessibility guidelines version 2. There is unlikely to be any expectation from staff that the system will be available in any other language other than English as English is the main teaching language of the University.

Update 2018 We have no evidence that the website is used more or less frequently by any one equality group.

Update 2019 We have no evidence that the website or the EdWeb CMS is used more or less frequently by any one equality group.

9. Is there evidence (or an expectation) of higher or lower uptake by any equality group(s)? If so, give details of the differences and the reasons for these (if known)?

We do not expect any difference in use of the web content system by any equality group.

Update 2018 – there has been no evidence to suggest that any equality group has been excluded.

Update 2019 – there has been no evidence to suggest that any equality group has been excluded.

10. Is any equality group excluded from participating in or accessing the service or functions? If so, why?

No, no equality group will be excluded by implementation of the policy.

Update 2018 – No equality group will be excluded by implementation of the policy.

Update 2019 – No equality group will be excluded by implementation of the policy.

11. Does the policy/practice create any barriers for any other groups? For example, because of the time when the service is delivered or because of restricted income? Is the communication of the policy/practice accessible to all groups?

The policy should not create any barriers as it will only create a more accessible system for web editors to add more accessible content. Communication regarding the rollout of the CMS will be done in a variety of ways and feedback will be gathered along the way. Training and supporting documents will also be made available to staff as another way of promoting and supporting web accessibility. The University offers free computer access to all staff 24 hours a day.

Update 2018 – To our knowledge no barriers have been created for any groups.

Update 2019 – To our knowledge no barriers have been created for any groups.

12. How are relevant equality groups or communities involved in the development, review and/or monitoring of the policy or practice?

We will recruit and test the new Content Management System with disabled members of staff.

All feedback from users will be gathered and analysed to note any potential unexpected positive or negative impacts that need to be addressed.

Update 2018 – Some user testing was completed on a visually impaired member of staff. The 2018 staff survey should be used to gather any potential issues with the CMS and further testing can be completed if the need arises.

Update 2019 – The 2019 staff survey should be used to gather any potential issues with the CMS and further testing can be completed if the need arises.

13. Are there any other points to note regarding the potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations? If so, note these here.

No.

H. Equality Impact Assessment Outcome

There is a legal obligation to take account of the results of the EqIA in the development of a new or revised policy or practice. This requires considering taking action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and exploiting any potential for positive impact. Clearly any unlawful discrimination must be eliminated.

Having considered the answers in section G, select one of the four options below to indicate how the development/review of the policy/practice will be progressed. Delete the options that do not apply.

Option 1: No change required – the assessment is that the policy/practice is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review.

Accessibility of the new CMS system has been taken into consideration throughout the project. We will continue to gather feedback and will respond and make changes where this is needed. The website is not static and we plan to add improvements over time. With the introduction of a web accessibility policy we feel that the process is robust enough to proceed. We will continue to promote and support web accessibility throughout the University.

I. Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.
 - **Monitor and respond to all CMS user feedback**
 - **Promote the University web accessibility policy and continue to develop support and guidance.**

- **Assess current content to check where it might not fully meet the guidelines of the web accessibility policy and support staff to upgrade and improve this content.**

Update 2018 – all actions listed above are ongoing

2. State how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).

Please see the actions above.

3. When will the policy/practice next be reviewed?

The system will next be reviewed when any changes are made to the CMS system or if we receive any positive or negative feedback related to any of the 9 protected characteristics.

Update 2018 – CMS has been reviewed but no significant changes have occurred during the past year. However change is likely to occur going forward with the upgrade of the system from Drupal version 7 to Drupal version 8 so this should be reviewed again in December 2018.

Update 2019 – CMS has been reviewed but no significant changes have occurred during the past year. However change is likely to occur going forward with the upgrade of the system from Drupal version 7 to Drupal version 8 so this should be reviewed again in April 2020 or earlier if any significant changes occur before then.

J. Publication of EqIA

EqIAs are published on the Equality and Diversity website.

There is a statutory requirement to publish EqIAs within a reasonable period. However, in some circumstances there may be valid reasons to limit what is published or to delay publication.

Can this EqIA be published in full, now? **YES**

If No – please specify when it may be published or indicate restrictions that apply.

J. Sign-off

EqIA undertaken by (name(s) and job title(s)): **Bruce Darby, Project Manager, University Website Programme, Information Services**

Accepted by (name): **Dawn Ellis, Director, University Website Programme**

[This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]

Date: **04/09/2015**

Update 2018 - Bruce Darby, Project Manager, Website and Communications undertook the EqIA. Stratos Filalithis, acting Head of Website and Communications, has accepted this EqIA.

Date: 09/02/18

Update 2019 - Bruce Darby, Project Manager, Website and Communications undertook the EqIA. Stratos Filalithis, Head of Website and Communications, has accepted this EqIA.

Date: 22/05/19