



Equality Impact Assessment Guidance and Template

This form is intended to help you decide whether an Equality Impact Assessment (EqIA) is needed and, if it is, to carry out the assessment of impact.

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement 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

EqIA is part of the University's general equality duty under the Equality Act 2010 and the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. The Equality Act 2010 specifies the following 'protected characteristics': age, disability, race (including ethnicity and nationality), religion or belief, sex, sexual orientation, gender reassignment, pregnancy and maternity, and marriage or civil partnership. This form uses 'equality group' to mean persons who share a relevant protected characteristic.

The University has a general equality duty to have due regard to the **needs** to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people who share a relevant protected characteristic and people who do not share it.

Under the Scottish Regulations, the University has a specific duty – subject to relevance and proportionality - to assess the impact of applying proposed new or revised policies and practices against the needs above. 'Policy and practice' should be interpreted widely to include the full range of the University's policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services – essentially everything we do.

This form is a tool to help with screening and EqIA and is designed to lead you through the process through asking pertinent questions and giving examples. However, the law does not dictate a particular form for EqIA. The requirement is to actively consider how a policy or practice will meet the general equality duty, and take any necessary action. Wherever practicable, EqIA should be built into standard processes and tailored to the nature of the policies or practices involved.

It is, however, necessary to publish EqIA where the policy or practice is applied, so all EqIAs – in whatever format - should be sent to equalitydiversity@ed.ac.uk for publication.

The form includes: some details about the policy/practice; a screening analysis to indicate whether full EqIA is required; and then a number of questions to enable full EqIA.

Answers should be recorded after the questions and the form can be expanded and supplemented as required. Answers may be as long or short as is necessary and relevant, bearing in mind that the effort involved in EqIA should be proportionate to the relevance of the policy or practice to equality.

Once completed, this form will be the record of the screening and, where applicable, the EqIA of the policy or practice. All full EqIAs are published.

<p>A. Policy or Practice (name or brief description):</p> <p style="text-align: center;">Policy on Admissions Feedback, Appeals and Complaints</p>
<p>B. Reason for screening (delete as applicable):</p> <ul style="list-style-type: none">Proposed change to an existing policy/practice
<p>C. Person responsible for the policy area or practice:</p> <p>Name: Rebecca Gaukroger</p> <p>Job title: Head of Admissions</p> <p>School/service/unit: Student Recruitment & Admissions</p>
<p>D. Screening Analysis</p> <ol style="list-style-type: none">Does the policy or practice affect primary or high level functions of the University? YesIs 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)? YesIs the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? Yes <p>If the answer to any of these questions is 'Yes', an EqIA should be carried out on the proposed/revised policy or practice at an early stage and in any event before it is finalised.</p>
<p>E. Screening outcome</p> <p>Equality Impact Assessment required: Yes/No</p> <p>Record notes about the screening process or outcome here.</p> <ul style="list-style-type: none">If EqIA is required, note when/at what stage(s) and by whom EqIA will be carried out. <p style="padding-left: 40px;">EqIA will be carried out once proposed changes to the policy have been clarified but before any decisions are made as to which of the proposed changes will be implemented.</p> <p style="padding-left: 40px;">EqIA will be carried out by Gillian Simmons, SRA Senior Policy and Project Officer.</p>
<p>F. Sign-off</p> <p>Screening undertaken by (name(s) and job title(s)): Gillian Simmons, Senior Policy and Project Officer</p> <p>Accepted by (name): Rebecca Gaukroger [This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]</p> <p>Date: 16 May 2013</p>

If EqIA is not being carried out, delete the remainder of this form and send the completed form to equalitydiversity@ed.ac.uk.

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 EqIA 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 EqIA: in some circumstances - particularly for new policies/practices – there may be limited information on which to base EqIA. In these cases, the EqIA should be carried out to the extent possible and should identify arrangements for monitoring/investigation of equality impact and for fuller EqIA 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 EqIA 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 EqIA)? On what aspects of equality does the policy/practice particularly impact?

The University's Policy on Admissions Feedback, Appeals and Complaints has been reviewed and revisions proposed in order to comply with the new Complaints Handling Procedure implemented on 11 March 2013. The scope of the revised Policy has been extended to include postgraduate admissions.

In addition, further revisions have been proposed to streamline the process, removing the right of an unsuccessful candidate to request an informal review of the selection decision regarding his/her application. This EqIA will consider whether the removal of the right to informal review could adversely impact on any protected group, and if so, whether any actions can be taken to mitigate such impacts.

The process for requesting feedback or submitting an appeal should be equally accessible to any candidate who has submitted an unsuccessful application. Whilst any applicant has the right to make a complaint with regard to Admissions services, this would

be done in line with the University's Complaints Handling Procedure. The Policy on Feedback, Appeals and Complaints will simply signpost an applicant to the Complaints Procedure.

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

This policy applies to all candidates seeking admission to the University, and it is therefore relevant to all equality groups.

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 tends to impact more on women).

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.

Some equalities data is captured through the UCAS undergraduate application process and on the postgraduate application forms (age / gender / disability / ethnicity) which gives us a profile of the applicant pool. However, it should be noted that this information is self-declared and the data may not be complete. Information on other protected characteristics is not collected.

No data has previously been collected to monitor the equality profiles of unsuccessful candidates seeking feedback or submitting appeals about the admissions service in order to ascertain if any equality group is under-represented in accessing these services in contrast to the equality profile of applicants to the University as a whole. Data related to complaints would be captured separately.

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.

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.

There is currently insufficient information to make a fully informed assessment of the policy.

Admissions offices report that most unsuccessful applicants for undergraduate study request, and receive, feedback.

Information will be gathered through implementation of the policy on those making appeals. This will allow us to identify whether people from any protected characteristic group are more or less likely to make an appeal.

Data on those making complaints will be captured through the new Complaints Handling Procedure.

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?

The policy is designed to mitigate against any discrimination or less favourable treatment of any particular equality group as a result of requesting feedback or making an appeal.

Because most unsuccessful applicants request feedback, there is no likelihood of discrimination being applied against any individual applicant as a result of his/her request for feedback.

Information on those making appeals will be gathered as part of the new procedure, and will allow us to monitor whether there is any negative impact on anyone who makes a subsequent application following an unsuccessful appeal.

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

The policy allows for a third party to request feedback, make an appeal or use the complaints procedure on behalf of an applicant, providing the third party has appropriate permission from the applicant, in recognition of the fact that the applicant may need help in the process.

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?

Providing constructive feedback should help all unsuccessful applicants to improve any future application to this University, or to others. However, this does not directly contribute to advancing equality of opportunity or minimising disadvantage.

The fair application of the appeals procedure allows all applicants the opportunity to

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

appeal a selection decision providing there are grounds as set out within the policy. It could be that the grounds on which an appeal is made relate to protected characteristics, where information was not previously available and that any disadvantage can be addressed. However, this procedure does not directly contribute to advancing equality of opportunity or minimising disadvantage.

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?

The University's admissions policies should be applied fairly and indiscriminately by those making selection decision to all applicants whether they are in a protected group or not. The application of this policy, and in particular the appeal and complaints procedures, should highlight any areas where applicants believe this is not the case and allow us to take appropriate action. As such, the application of this policy will tackle prejudice and promote consideration of possible unintentional bias in admissions processes.

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?

There is no evidence to suggest that people from different equality groups have different needs or experiences in relation to this policy.

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 currently have no evidence to suggest a higher or lower uptake by any equality group, but the introduction of this policy will allow us to collect and monitor data and identify any such evidence.

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

No equalities group is excluded from accessing the service or functions.

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?

Requests for feedback, and appeals, are expected to be submitted in writing. This could disadvantage someone with a visual impairment or a learning difficulty which makes writing difficult.

Communication of this policy/procedure will be mainly via the University of Edinburgh website. Information on the policy/procedure will also be given verbally on request.

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

Equalities groups have not been involved in the current review of this policy. However, future monitoring of this policy will include the collating of equalities data, and any associated surveys with applicants about their experiences.

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

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.

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.

State the reasons for this conclusion and the evidence used, if not already included in section G.

The reasons for this conclusion are set out in section G.

I Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.

Equalities data on those who appeal an admissions data will be collated and analysed by admissions cycle

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

The equalities data will be used to monitor the implementation of the policy and procedure in terms of its equality impact. Equalities groups will be included in this process.

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

The policy will be reviewed in December 2015.

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/~~No~~

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)):

Gillian Simmons, Senior Policy and Projects Officer

Accepted by (name): Rebecca Gaukroger

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

Date: 16 May 2013

Retain a copy of this form for your own records and send a copy to equalitydiversity@ed.ac.uk.