

# **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 <a href="https://www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment">www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment</a>

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 <a href="mailto:equalitydiversity@ed.ac.uk">equalitydiversity@ed.ac.uk</a> 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.

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

The introduction of a pilot in the central area to install a team of responders to assist with evacuation of disabled users requiring assistance in an emergency situation.

Update May 2018 –following the success of the initial pilot from January 3rd 2018 this pilot cover will be extended to cover all central area buildings 24/7. The pilot cover extends to Moray House and Edinburgh College of Art Campus (ECA)

Update Sept 2018 – following the success of the central area trial cover has been extended to the following locations

Kings Buildings 0800 - 2300 Mon - Friday

Easter Bush 0800 - 2100 Mon - Friday

This cover is provided through a combination of servitorial and security staff, with deployment controlled through security control rooms via radio communication to on site and mobile staff.

- B. Reason for screening (delete as applicable):
  - Proposed change to an existing policy/practice
  - Undertaking a review of an existing policy/practice

Update May 2018 - review of existing EqIA

Update Nov 2018 – review and additions to scope and extension of provision

C. Person responsible for the policy area or practice:

Name: Gary Jebb

Job title: Director of Estates

School/service/unit: **Estates Department** 

Update May 2018 – as above Update Nov 2018 – as above

- D. Screening Analysis
- Does the policy or practice affect primary or high level functions of the University?
   Yes
- 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 EqIA?
  Yes

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.

### E. Screening outcome

Equality Impact Assessment required: Yes

Record notes about the screening process or outcome here.

An EqIA will be undertaken for the pilot project and will be reviewed and updated prior to any decisions regarding the continuation or expansion of the pilot in the future.

Review of the pilot has led to the extension of provision documented above

# F. Sign-off

Screening undertaken by (name(s) and job title(s)): Jane Norman, Vice Principal of Equality and Diversity and chair of the Disabled Evacuation Working Group.

Accepted by (name): Gary Jebb, Director of Estates

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

Date: 17/08/17

Update May 2018 – as above Update November 2018 – as above

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?

It is recognised that the current system of Personal Emergency Evacuation Plans (PEEPs) is failing to address the needs of disabled users with regard to egress from buildings in emergency situations. This in turn restricts their access to such buildings. In order to rectify this situation and prevent disadvantage, a working group was formed with various stakeholders including the Fire Safety Unit, Estates Department, the Student Disability Service, Information Services and disabled users. In particular, the group recognised the need to provide for out of hours events and to be able to provide safe egress for members of the general public/visitors or those staff and students who do not have a PEEP.

In early 2017 a pilot scheme was introduced in the central area. This provided a team of staff trained in the evacuation of disabled people that could respond to a number of buildings as required. The core team provided cover between 0900 and 2200 Monday to Friday in the central area to assist with disabled egress from any open buildings. Their tasks included responding to fire alarms, liaising with individuals via emergency communication panels, assisting in egress by utilising evacuation chairs where necessary and fire evacuation lifts. This pilot was funded by Estates Department. Staff involved in this service needed to be able to use stairs, communicate via intercoms and lift appropriate weights. New staff have been recruited for some of these roles along with drawing staff from existing servitorial and security teams.

The main focus for this EqIA is the protected characteristic of disability and the focus is the safe egress of disabled users and others who require assistance to evacuate. It is noted that the majority of disabled users will not require assistance to evacuate.

Update May 2018 - From January 3<sup>rd</sup> 2018 this cover will be extended to cover all central area buildings 24/7. This cover extends to Moray House and ECA (as they are close in proximity to the central area). In order to ensure no disadvantage occurs, existing staff unable to take on these additional duties will experience no detriment such as reduced working hours or pay. Any reasonable adjustments required by team members will be implemented. We are training all security staff who are able and to undertake these duties to ensure we have a sufficient pool of resource to staff this service. This training has now all been completed.

Update November 2018. Provision of this service has been extended to cover Kings Building Mon – Fri 0800 – 2300 and Easter Bush Mon – Fri 0800 – 2100. This cover is provided through a combination of servitorial and security staff who have been trained in evacuation procedures by the Fire Safety Unit. Additional radios have been provided to facilitate activation and control of the response from security control rooms. As per the update above existing staff unable to take on these duties will experience no detriment such as reduced working hours or pay. To date there has been no case where someone has needed to be evacuated on response.

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 partnership<sup>1</sup>

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).

The main protected characteristic affected will be disability. The focus of the new procedure is the evacuation of individuals who require assistance which typically is as a result of a disability. The guidelines will only be published in English so there may be an impact on the protected characteristic of race but as the main teaching language is English, we do not envisage any disadvantage.

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.

There is evidence that the previous evacuation provision was not fully understood or implemented, and nor was it considered adequate.

This evidence includes the following:

- The discrepancy between the number of disabled staff and students that can be seen using the University facilities and the number of Personal Emergency Evacuation Plans in place
- Students raising issues regarding evacuation with tutors and Directors of Professional Services
- Student complaints regarding the accessibility of the University estate and the raising of the issue in the University Court resulting in a University wide disability review
- Staff observations
- Obtaining the experience of disabled students and staff via consultations.

To obtain further evidence a Disabled Evacuation Working Group was set up which

<sup>&</sup>lt;sup>1</sup> 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.

included various stakeholders -The Student Disability Service, Estates Department, Fire Safety Unit, Information Services, Human Resources, Disabled Students representatives etc.

In addition a complete review of the Estate was commissioned to look at the structural provision for assisted egress and the operational costs of staffing such a service. These documents are available upon request.

Update May 2018 – we have received no negative or positive feedback related to the pilot related to any of the 9 protected characteristics. To date the team has attended drills but has not been required to be mobilised for any "live events". The team will continue to involved in fire drills at buildings covered by this service.

Update Nov 2018 – We have not received any positive or negative feedback and for the present the Disability Evacuation Working Group has been put on hold till as and when they are required for further projects/discussion.

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.

It is felt that there is sufficient evidence to proceed.

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?

There is no reason that this guidance will lead to any form of prohibited conduct. In fact it will reduce barriers and improve accessibility as it will ensure disabled users can access more buildings with the knowledge that safe evacuation procedures are in place over a wider range of hours. The group appreciates that this will mean that at present some areas are not covered apart from the Main Library which offers disabled egress provision 24/7. However, the group is actively working at identifying and implementing solutions in the areas currently out with the scope of this pilot to ensure no disadvantage.

Update May 2018 – the expansion of the service to cover Moray House and ECA will help ensure a wider range of buildings and venues are accessible for disabled students and so give organisers of events greater choice on where to hold activities and this greater choice should ensure any chance of prohibited conduct is reduced and will provide a push to expand cover across a wider range of hours and locations. Existing staff unable to take on these additional duties will experience no detriment such as reduced working hours or pay.

Update November 2018 – the expansion of the service to Kings Buildings and Easter Bush gives organisers of events greater choice on where to hold events and gives disabled staff and students greater access to the wider estate. There will be no detriment to existing staff at these other campuses who are unable to undertake these duties. To date we have received no feedback

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

Yes all documentation about the level of coverage will be available in various formats upon request.

Facilitators of events will be expected to hold meetings/lectures/social events etc. within areas covered by the teams to ensure a disabled user is not disadvantaged.

Update May 2018 – reasonable adjustments will continue to be made as required. To date we have had no requests for reasonable adjustments.

Update November 2018 – We have had no requests to date for any reasonable adjustments.

- 6. Does the policy/practice contribute to advancing equality of opportunity<sup>2</sup>? Will it help to remove or minimise disadvantage?
  - Yes by aiming to provide safe egress for disabled users ensuring safe access to more University buildings

Will it meet the needs of different equality groups?

 These guidelines apply mostly to the protected characteristic of disability but the needs of all protected characteristics have been considered in the development of this EqIA and all feedback will be monitored for all positive or negative issues relating to any of the nine protected characteristics and the appropriate action taken.

Will it encourage increased participation of particular groups?

 Yes, as disabled users should be better able to access buildings knowing procedures are in place for safe egress

Will it take account of disabled people's impairments?

 Yes the new arrangements have been designed to ensure the safe evacuation across the spectrum of impairments from those requiring guided assistance to those who are able to self-transfer and those who need to remain in a wheelchair as it forms a life support function.

Update May 2018– the expansion of the service to cover an additional 2 areas should further reduce barriers and meet more users needs by providing a wider range of locations that are accessible for disabled users who require assistance to evacuate.

Update November 2018 – expansion of the service to Easter Bush and Kings Buildings will further reduce barriers to disabled staff, students and visitors accessing our estate.

- 7. Is there an opportunity in applying this policy/practice to foster good relations between people in any protected group and those who are not<sup>3</sup>? Will it help to tackle prejudice and/or promote understanding?
  - Yes it will raise the awareness of others of the need to consider disabled egress and assisted evacuation when organising events, redesigning buildings etc. It also demonstrates the seriousness with which the University considers this issue and the pro-active approach it has taken to resolve the concerns that have been raised.
- 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 are the main focus of these guidelines and will have different expectations as they will require the process to meet their individual needs and requirements regarding egress.

<sup>&</sup>lt;sup>2</sup> This question does not apply to the protected characteristic of marriage or civil partnership

<sup>&</sup>lt;sup>3</sup> This question does not apply to the protected characteristic of marriage or civil partnership.

- 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)? Disabled users are the main focus of these guidelines so we would naturally expect higher uptake from disabled users than other protected characteristics. However, anyone who requires assistance to evacuate will be covered by these guidelines regardless if they met the legal definition of disability or not.
- 10. Is any equality group excluded from participating in or accessing the service or functions? If so, why?

None, but not applicable to disabled and non-disabled users who are able to egress from the building in an emergency without assistance

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 pilot and central area roll out is designed to break down barriers rather than create them. This guidance will be in English but as this is the main teaching language we do not envisage any disadvantage. The guidance will be available in alternative formats upon request.

At the moment it is recognised that the arrangements are restricted to the central area and including Moray House and ECA and that this will mean that at present some areas of the wider estate are not covered.

Update May 2018 - From January 3rd 2018 this cover will be extended to cover all central area buildings 24/7. This cover extends to Moray House and ECA

Update November 2018 – This service is now extended to cover Easter Bush, Mon – Fri 0800 – 2100 and Kings Buildings, Mon – Fri 0800 – 2300.

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

Consultation occurs on an ongoing basis with disabled students and staff, Student Disability Service, Estates Department, Fire Safety Unit, Information Services (including the IS Disability Information Officer) and Schools via the Disabled Evacuation Working Group chaired by Jane Norman. In addition, all members of the group are currently involved in the process and so are able to feed in first hand practical knowledge of issues with the current system.

As the central area cover is rolled out all feedback will be analysed for any potential positive or negative impacts on any of the nine protected characteristics.

Update May 2018 – The ECA and Moray Director of Health and Safety and the Director of Corporate Services, in addition to the people above.

Update November 2018 – Central Health and Safety liaised with Staff at Kings Buildings and Easter Bush about the changes.

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.

An important element will be how the information regarding the roll out is

communicated effectively throughout The University of Edinburgh to all the various stakeholders.

Update May 2018 –Communication about these changes will be made when the service goes live on January 3<sup>rd</sup>. An email will be sent to all University Registrars to advise them of the pilot.

Update November 2018 – Communication of new arrangements sent to key stakeholders in September advising of extension of service to Kings Buildings and Easter Bush. We have had no requests for information in alternative formats.

# **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

For the reasons detailed above it is acknowledged that the provision for assisted evacuation across other campuses is an additional matter that must be resolved to ensure no disadvantage. Alternative models may be more suitable in these other campuses.

Update May 2018 - Option 1 for the reasons stated above.

**Update November 2018 – Option 1 for the reasons stated above.** 

#### I Action and Monitoring

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

Set up a means of communicating these new arrangements to the relevant people throughout The University of Edinburgh.

Ensure staff are aware of the need to make reasonable adjustments and make information available in alternative formats upon request.

Employ staff to make up the team to cover the provision of disabled evacuation assistance for the central area and provide training.

Monitor all feedback and review the performance of the roll out in order to identify any positive or negative feedback on any of the 9 protected characteristics.

Update May 2018 – communication of the expansion of the service is needed once the revised service begins on 3<sup>rd</sup> January 2018

Update November 2018 - Communication to key stakeholders at Easter Bush and

Kings Buildings issued in September advising of extension to cover.

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

The Staff and Student feedback will be monitored for any positive or negative comments relating to any of the 9 protected characteristics.

The progress of the roll out will be reviewed by the Disabled Fire Evacuation Working Group to take into account feedback from all stakeholders including the Student Disability Service, Human Resources, Estates Department and any feedback from disabled users.

Update May 2018 – we will continue to monitor feedback as above. Update November 2018 – as above and we will monitor through drills and recording of responses on the security incident recording database "Perspective" will take place.

3. When will the policy/practice next be reviewed? In December 2017

Update May 2018 - December 2018

Update November 2018 - December 2019

### 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)): Jane Norman, Vice Principal of Equality and Diversity and chair of the Disabled Evacuation Working Group

Accepted by (name): Gary Jebb, Director of Estates

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

Date: 16/11/17

Update May 2018 – as above Update November 2018 – as above

Retain a copy of this form for your own records and send a copy to <a href="mailto:equalitydiversity@ed.ac.uk">equalitydiversity@ed.ac.uk</a>