

# **Equality Impact Assessment Template**

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 <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 covers policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services, but will be referred to as 'policy/practice' hereinafter.

A. Policy/Practice (name or brief description):
Change to operation of Main Library security exit gates.

Currently the majority users entering the library present their smartcard to the proximity reader to operate the entry speedlane turnstiles but must press a button in the gate post in order to operate the dedicated exit turnstiles.

From 1 March 2017 these exit turnstiles will also be operated by proximity reader.

This will be replicated at the entry/exit speedlanes to the café from the library.

- **B.** Reason for Equality Impact Assessment (Mark **yes** against the applicable reason):
  - Proposed new policy/practice
  - Proposed change to an existing policy/practice Yes
  - Undertaking a review of an existing policy/practice
  - Other (please state):
- **C.** Person responsible for the policy area or practice:

Name: Bryan MacGregor

Job title: Director

School/service/unit: User Services Division, Information Services

- **D.** An Impact Assessment should be carried out if any if the following apply to the policy/practice, if it:
  - affects primary or high level functions of the University No
  - is relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' as set out in the Policy and Guidance)? Yes
  - It is one which interested parties could reasonably expect the University to have carried out an EqIA? - Yes

E. Equality Groups

To which equality groups is the policy/practice relevant and why? (add notes against the following applicable equality group/s)

- 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>

Add notes against the following applicable statements:

On any available information about the needs of relevant equality groups: The policy/practice has the potential to impact all equality groups as it will apply to any user of the library. However, we feel the policy may mainly potentially impact on the area of disability due to the physical layout of the gates. There are wide access speedlanes for entry and exit suitable for wheelchair users and this will be mitigated in the same way as at present as the reception point is staffed at all times and staff will continue to facilitate entry and exit for those users who cannot for any reason use the speedlanes. In addition the use of proximity swipes rather than the need to press a small button is likely to improve accessibility for users with manual dexterity problems.

The new system will mean that the time of entry and exit of a specific library user will be recorded rather than just the date and time of entry. This information will be used to measure length of stay in general of users, identify busy periods in the library and other generic statistics to help improve the service the library offers and to ensure we are able to best meet the needs of our users.

The University currently collects data each time a card is swiped. This data includes:

- The date and time of the 'swipe'
- The identity of the 'door' being swiped, including door number and descriptor
- Whether access was permitted or denied
- Whether the 'swipe' was going into a restricted area or coming out of a restricted area
- The number of the card being swiped
- The identity of the card holder, including surname, initials, ID number, and category of card holder (e.g. staff member, undergraduate, postgraduate, etc.)

This information is collected and used in accordance with the *Terms and Conditions of the University Card* published at <a href="http://www.ed.ac.uk/information-services/help-consultancy/card/terms-conditions">http://www.ed.ac.uk/information-services/help-consultancy/card/terms-conditions</a> and the data protection notice published at <a href="http://www.ed.ac.uk/information-services/about/policies-and-regulations/statutory-notices/dp">http://www.ed.ac.uk/information-services/about/policies-and-regulations/statutory-notices/dp</a>. Access to the raw data is strictly limited and is only used for purposes compatible with the University's data protection obligations. This means that whilst it is technically possible to identify the date and time the card of a specific user was 'swiped', the University would only do so in exceptional circumstances. Communication will be made to users who have a concern to reassure them that access to the raw data is strictly limited and is only used for purposes compatible with

<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.

the University's data protection obligations. This means that whilst it is technically possible to identify the date and time the card of a specific user was 'swiped', the University would only do so in exceptional circumstances. The University is currently reviewing the retention period for this data to ensure that it kept no longer than necessary

- Any gaps in evidence/insufficient information to properly assess the policy, and how
  this be will be addressed: No gaps in evidence/insufficient information have been
  identified. The new practice will enable more accurate information (length of
  stay) to be gathered as to the usage of the library and may help make service
  improvements.
- If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups: There is no reason to believe that the application of this policy will lead to any form of prohibited conduct.
  - If the policy/practice contributes to advancing equality of opportunity<sup>2</sup>

The improved ease of egress by proximity swipe rather than push button should make the building more accessible for some disabled users. In addition, the information gathered from the statistics will enable us to tailor our service to best meet the needs of our users and hopefully improve our service for all 9 protected characteristics.

• If there is an opportunity in applying this policy/practice to foster good relations: It will demonstrate that the Library takes accessibility seriously and will take any possible steps however small to improve access.

At present users often leave the library for short periods and leave behind their smartcards with their belongings on the upper floors. On re-entering they must queue at Reception to be issued with a day pass and must then return to reception with their card within 15 minutes to have the day pass message removed from their record. (As only 4 day passes are permitted in any academic year, this is important).

Under the new system all users will be required to have their smartcard with them in order to leave the library, which will have a beneficial impact on those re-entering as they will always be able to use the speedlanes.

If the policy/practice create any barriers for any other groups?

We do not envisage that this policy will create any barriers. Information gathered from the entry and exit proximity swipes about individuals will not be used unless there is a security or severe student welfare issue."

The University Library welcomes visitors and offers library membership for reference use (free) or borrowing books (fees may apply) to Alumni, NHS Lothian staff, staff and students from other universities, and the wider public. The Library has recently introduced a yellow identity smartcard which enables passage through access controlled library entrances and exits for an improved user experience, and for which an EqIA has been submitted for publication ("Applying to join the Library (not Staff or Student) and obtaining Library membership smartcard"). However, existing library members who have been previously issued

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

with a cardboard (dumb) membership card will not be able to enter or exit without staff mediation. A communication has been sent by email during February to encourage all such members to upgrade their membership card.

How the communication of the policy/practice is made accessible to all groups, if relevant?

- The Library webpages will be updated to coincide with the introduction of the new policy and notices will be displayed within the Library. Social media channels will also be used to communicate with library users. The Webpages are regularly tested for accessibility in lines with the Web Content Accessibility Guidelines Version 2 AA standard and compatibility with assistive technology. Communication about the policy will be available in alternative formats upon request.
- How equality groups or communities are involved in the development, review and/or monitoring of the policy or practice? The Disability Information Officer for Information Services was consulted about any issues which might affect members of equality groups. The policy will be monitored and reviewed and equality groups consulted if or when any specific issues arise. All feedback will be monitored for any positive or negative impacts on the 9 protected characteristics.
- Any potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations: No further impacts other than those identified above.

### F. Equality Impact Assessment Outcome

Select one of the four options below to indicate how the development/review of the policy/practice will be progressed and state the rationale for the decision

Option 1: No change required – the assessment is that the policy/practice is/will be robust.

For the reasons stated above.

#### G. Action and Monitoring

- 1. Specify the actions required for implementing findings of this EqIA and how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).
  - Ensure staff are aware of the need to provide alternative formats on request of any communication about the policy
  - Ensure frontline staff are aware of the need to assist disabled users and others users as required.
  - Continue to monitor all feedback for any positive or negative comments related to any 9 of the protected characteristics.
- 2. When will the policy/practice next be reviewed? When there is any significant change to this policy or when we receive any positive or negative feedback related to any of the 9 protected characteristics.

#### H. Publication of EqIA

Can this EqIA be published in full, now? Yes

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

## I. Sign-off

EqIA undertaken by (name(s) and job title(s)): Winnie Chambers, IS Help Services Team Manager, User Services Division

Accepted by (name): **Barry Croucher, Head of Help Services, User Services Division** [This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]

Date: February 2017

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