



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.

A. Policy or Practice (name or brief description): University Computing Regulations
B. Reason for screening (delete as applicable): <ul style="list-style-type: none">• Undertaking a review of an existing policy/practice
C. Person responsible for the policy area or practice: Name: Brian Gilmore Job title: Director of IT Infrastructure School/service/unit: IT Infrastructure, 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 EqIA? Yes
E. Screening outcome Equality Impact Assessment required: Yes <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>It is required because it is a Policy affecting all levels of the University, at a high level. It applies both to staff and students. The Computing Regulations Group has carried out an annual review of the Policy, and made amendments accordingly, we are carrying out this EqIA before the Policy goes to Central Management Group and University Court, for approval.</p>
F. Sign-off Screening undertaken by: Claire Maguire, Knowledge Management & Planning Officer Accepted by: Brian Gilmore – Director of IT Infrastructure, Information Services <u>Update April 2015</u> – This policy is now the responsibility of Jo Craiglee, Head of Knowledge Management and IS Planning. There have been no changes to this policy and no feedback from users (negative or positive) so we feel this EqIA remains valid and up to date. If there are any changes to the policy or feedback negative or positive from users then we will revisit and update this document, failing which it will be reviewed again in April 2016. <u>Update September 2015</u> – The Regulations were reviewed and updated to ensure the University is compliant with the new Counter-Terrorism and Security Act 2015. The regulations also introduced a new stipulation that places a duty on users to dispose of any University data safely. It is not anticipated that these changes will impact negatively or positively on any of the 9 protected characteristics.

Date: **2 April 2013**

G. Equality Impact Assessment

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 Computing Regulations Group has carried out an annual review of the Policy, and made amendments accordingly, we are carrying out this EqIA before the Policy goes to Central Management Group and University Court, for approval. The Policy is unlikely to positively or negatively impact against any of the 9 protected characteristics, although the requirement to use a pin or password to security protect may potentially impact disabled users. The Regulations deal mainly with compliance with UK civil and criminal law, therefore, there may be an impact on race as a protected characteristic for non-UK users and those accessing computing systems remotely from out with the UK.

Update September 2015 - – The Regulations were reviewed and updated to ensure the University is compliant with the new Counter-Terrorism and Security Act 2015. The regulations also introduced a new stipulation that places a duty on users to dispose of any University data safely. It is not anticipated that these changes will impact negatively or positively on any of the 9 protected characteristics. The regulations simply state that users must comply with Counter-Terrorism and Security Act 2015. This Act places a duty on organisations and its users not to “draw” anyone into terrorism/a terrorist act.

2. To which equality group 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.
 - Age – we do not envisage that the policy will positively or negatively impact against any particular age grouping.
 - Disability – there is a requirement within the Policy to protect security of files etc with the use of pins/passwords. For some disabled users, particularly those with specific learning difficulties, the memorisation on use of a pin/password may potentially cause difficulties.
 - race (including ethnicity and nationality) – there is the potential for a negative impact on race as a protected characteristic for non-UK users and those accessing computing systems remotely from out with the UK.
 - religion or belief – we do not envisage that the policy will positively or negatively impact against this protected characteristic.
 - sex – we do not envisage that the policy will positively or negatively impact against this protected characteristic.
 - sexual orientation – we do not envisage that the policy will positively or negatively impact against this protected characteristic.
 - gender reassignment – we do not envisage that the policy will positively or negatively impact against this protected characteristic.
 - pregnancy and maternity – we do not envisage that the policy will positively or

negatively impact against this protected characteristic.

- marriage or civil partnership¹ – **we do not envisage that the policy will positively or negatively impact against this protected characteristic.**

3. What evidence is available about the needs of relevant equality groups?

There is no specific quantitative equality data relating to these issues. According to the latest Student Disability Annual Report 2011-12, 56% of disabled students report specific learning difficulties; and 15% report mental health problems – both of which might potentially impact on the individual's use of pins and passwords in some individual cases. In addition, 2.1% of staff recorded a disability, according to the Equality and Diversity Monitoring and Research Committee (EDMARC) 2011-12. Currently, the number of distance learning students out with the UK is 872.

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.

Given the nature of the policy we feel there is sufficient evidence and data on which to proceed with the EqIA. We will monitor any feedback to the policy on an on-going basis in cases this highlights any unforeseen impact of the policy on any of the protected characteristics.

Update September 2015 – We have had no feedback positive or negative related to any of the 9 protected characteristics.

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?

This policy will not lead to discrimination, harassment or victimisation. Where we have identified any potential for less favourable treatment we have recorded how this will be addressed as detailed in the answers to the questions below.

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

To address the issue of potential negative impact against disabled users, the Policy has stated where possible, devices can be protected by “similar mechanisms” to a pin, to enable users greater freedom in choosing their method of security protection. The Policy will be offered in alternative formats upon request.

Update September 2015 – we have no requests for the regulations to be in an alternative format.

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?

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.

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

Not applicable to this Policy.

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?

Not applicable to this Policy.

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?

Non-UK users and users accessing computing facilities from out with the UK may have different expectations regarding laws relating to IT. We ensure the Policy is stated in full, including listing the major UK and civil criminal laws relevant, before the user agrees to the Regulations. This will enable users who may not be familiar with these laws to be aware of what they are agreeing to.

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)?

No evidence of higher or lower uptake by any equality group.

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

No equality group, as a whole, is excluded, however as discussed above, some disabled users, non-UK users, and users accessing computing facilities from out with the UK may be impacted. For disabled users, we have allowed the use of non password or pin security devices from mobile equipment. The Policy does require the use of a password to access computing facilities but we would put in place reasonable adjustments relevant for a specific users, as required, as long as this allowed us to maintain a secure computing environment. For non-UK users and users accessing computing facilities from out with the UK, we ensure the Policy is stated in full, including listing the major UK and civil criminal laws relevant, before the user agrees to the Regulations. This will enable users who may not be familiar with these laws to be aware of what they are agreeing to.

11. Does the policy/practice create any barriers for any other groups?

12.

No.

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

At present, equality groups are able to offer feedback on the Policy, if they wish. We do not currently conduct any specific consultation with equality groups regarding this Policy. However, we would expect specific University services such as Student Disability Services and the International Office, to contact us if they received any feedback regarding this Policy, as they do with other similar

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

policies.

14. 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.

The Policy will need to be provided in an accessible format, particularly for disabled users who may need a copy of the Policy in an alternative format. We will ensure the online version of the Policy follows the W3C Web Content Accessibility Guidelines and the British Standards Institute guidance on website accessibility BS8878, wherever practical.

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.

Information recorded within Section G.

I Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.
There are no specific actions.

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

We will monitor all feedback and comments on the Policy, to ensure no negative impact on any of the protected characteristics.

3. When will the policy/practice next be reviewed? **2014**

Update April 2015 – This policy is now the responsibility of Jo Craiglee, Head of Knowledge Management and IS Planning. There have been no changes to this policy and no feedback from users (negative or positive) so we feel this EqIA remains valid and up to date. If there are any changes to the policy or feedback negative or positive from users then we will revisit and update this document, failing which it will be reviewed again in April 2016.

Update September 2015 - If there are any changes to the policy or feedback negative or positive from users then we will revisit and update this document, failing which it will be reviewed again in September 2016.

J. Publication of EqlA

EqlAs are published on the Equality and Diversity website.

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

Can this EqlA be published in full, now? **Yes**

J. Sign-off

EqlA undertaken: Claire Maguire, Knowledge Management & Planning Officer

Accepted: Brian Gilmore – Director of IT Infrastructure, Information Services

Date: 2 April 2013

Update April 2015 - Undertaken by Claire Maguire, Knowledge Management & Planning Officer and accepted by Jo Craiglee, Head of Knowledge Management & Planning

Update September 2015 – Undertaken by Claire Maguire, Knowledge Management & Planning Officer and accepted by Jo Craiglee, Head of Knowledge Management & Planning

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