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):
Online submission of Digital Images by All Students for use on their University Card

B. Reason for screening (delete as applicable):
• Proposed change to an existing policy/practice
Update 2015: This update is a review of the existing EqIA version published in 2014.
Update 2017: This update is a review of the existing EqIA version published in 2015.

C. Person responsible for the policy area or practice:
Name: **Barry Croucher**
Job title: **Head of Help Services**
School/service/unit: **IS User Services**

D. Screening Analysis
1. Does the policy or practice affect primary or high level functions of the University? **No**
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**
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.
• If EqIA is required, note when/at what stage(s) and by whom EqIA will be carried out.
• If EqIA is not required, note plans for review, monitoring or other action (including the communication of any favourable equality impact).
Viki Galt, IS Disability Information Officer, identified the need for a Screening analysis on Tuesday 22nd July 2014 having been invited by Colin Forrest, the ISG001 project manager, to conduct accessibility testing. Responsibility for the Screening analysis was accepted by the Service Owner. Barry Croucher is the Service Owner of University Card Services. Barry Croucher completed the Screening analysis and then the full EqIA on Wednesday 3rd September 2014, in advance of deployment for use by all applicants/students.
Update 2015: This update is carried out by Barry Croucher, Head of Help Services.
Update 2017: This update is carried out by Barry Croucher, Head of Help Services.

F. Sign-off

Screening undertaken by (name(s) and job title(s)): **Barry Croucher, Head of Help Services**
Accepted by (name): **Barry Croucher, Head of Help Services**
[This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]
Date: **18th September 2014** Date of Updating: 10 June 2015 **Date of updating:** 03 October 2017

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.

- 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 new practice will facilitate online submission of a digital image by all Students for use on their University Identity Card.
Currently, the card application process is entirely paper based for all students other than those doing Online Distance Learning courses (who are already using the new practice). Paper forms are sent to a student's home address. The student checks their details, adds a photograph to the form and then returns it to the University. The current method relies on a mail service and

this can be sub-optimal in some countries. Card Services print all the cards in bulk over the summer, and, typically, the students collect their cards at the start of semester. Having possession of a University card is required for students on campus as a means of evidencing membership of the University and their student status.

There are many disadvantages with this approach for students, and gives a poor impression of the University.

Facilitating online submission of digital images will mean:

- Students will not have to obtain a physical photograph, as they will be able to use a digital image taken on a range of devices with cameras and uploaded onto computer;
- the process of submission of digital image will be within the online environment in which they apply to the University (via a channel in MyEd);
- there will be a preview function allowing Students to check before submission that the image is likely to be acceptable for use, so reducing delay and need for resubmission of a substitute image;
- Students will receive a request from Card Services for submission of an image sooner than currently, as the request for digital image will be made by email automatically after the student goes UF (Unconditional Firm), rather than necessarily after the students status is set to ATR (Applicant Transfer), normally 6 weeks before start date, and by post;
- Students will not have to pay for postage to return a completed card form with photograph attached or make special dispensation for a visit to campus to submit their physical details;
- All Students who submit an acceptable image will receive a University Identity Card.
- Students will only be able to submit one image as standard practice and once accepted, request for replacement by a substitute image would not be granted; however, in the case of gender reassignment, for example, request would be granted, and the channel in MyEd can be enabled by Card Services staff to allow for a replacement digital image to be submitted and a replacement card sent out.

The ISG001 project - to enable all students to submit a digital image via MyEd, and for University Card Services to manage the submitted images – will go into the live environment on the 6th of October 2014. This is the start date for the new practice.

Update 2015: The system went live on 23 October 2014.

The issue of providing a digital image may have particular impact with regards to disability, race, religion/belief and gender reassignment. The other issue with regards to equality is that the change of practice should ensure all students without the means to take a digital image are not discriminated against.

- 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 practice is relevant to all equality groups as it will apply to any student wishing to obtain a University Identity Card. The practice may potentially have greatest impact on the areas of disability, race, religion/belief, and gender reassignment. Being able to complete the process remotely and online will potentially have a positive impact on the protected characteristics of gender reassignment (individuals will be able to update their photograph and details as they wish to reflect their progressions through the reassignment process), disability (particularly those with a physical impairment as they will be able to submit their photograph remotely and

do not need to access an accessible passport photo booth etc but can take a photo with an ordinary digital camera), we also have tested the software for uploading the photo to ensure it complies with current accessibility guidelines such as the WCAG version 2 and is compatible with assistive technology. There may also be a positive impact on the protected characteristic of race (as those students in countries with less reliable mail services will only be reliant on receiving the card through the post and not sending the application form as well). All those with caring responsibilities who may find it difficult to leave the house to get a photograph taken and then post a completed form to Card Services should see a positive effect. Therefore we feel the change will have a positive impact on many of the protected characteristics and have put in place systems to ensure no negative impact.

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[1]

There is a potential for a negative effect on religion and belief and race due to the need for a photograph to be submitted. This will be the same for the new process as with the old paper based process. To mitigate these effects if a student is unable to be identified from their image due to them wearing head covers for religious purposes then senior staff trained in Equality and Diversity will be able to make a final decision on whether or not to accept the image and issue a University card. In the event that a student had a religious or belief objection to a digital image or photograph being taken they would not have to submit/supply an image/photograph, and would be referred to Student Administration

Update 2015: No students have raised a religious or belief objection to a digital photograph being taken since the system went live.

Update 2017: A service improvement was effected in February 2017 following consultation with the University Chaplain and the Muslim Chaplain such that a webcam was set up in the Main Library Helpdesk cash room PC to allow us to take photos of users who do not wish to remove religious face coverings (ie. niqabs or burkas) in public at our visitor registration desk. This service has not been used to date but is available.

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).

- What evidence is available about the needs of relevant equality groups? E.g. information/feedback from equality groups or other stakeholders, involvement or

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[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.

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.

This change to practice has arisen in order to provide an improved service to all students (see section 1 above).
There were 32,591 students (all levels of study) mid-year in 2013/14 (Source: http://www.docs.sasg.ed.ac.uk/gasp/factsheet/StudentFactsheet300414.pdf).
3,079 were registered with University Student Disability Services (just under 9.5%).
The demographic of the 2013/14 student body shows students are domicile in 140 countries and 39% are non UK/Ireland domicile. There is evidence that new students arriving at the University find it difficult to return completed card application forms with photos attached in time for Freshers' Week: in September 2013, Card Services made 8,422 cards in advance of Freshers' Week and produced 2,588 cards on demand between 9th and 19th September 2013. This raises concerns that certain equality groups might find it difficult to obtain a physical photograph, perhaps due to distance from or physical difficulty in using a printing service, or to use the local postal service. The change of practice will make it easier for the user to obtain a University card.

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.

At present no records are kept of religion/belief for students.

There has been no negative feedback to date from distance learners who have used the system.

An evaluation of students arriving in January 2015 in relation to the new practice will be conducted in Semester 2 2014/15 in order to receive feedback on how well it is serving their needs, and reference direct or implied to equality issues will be analysed and addressed where possible.

Update 2015: Evaluation of students arriving in January 2015:
- Card Services has utilised the digital image submission of photograph for production of the first University card for all new students starting in January.

- An email reminder was sent on 1 December to new students who had not submitted an image and this elicited a good response.

- 614 of 800 (non-ODL) students expected in January submitted their digital image and a card was pre-produced. This is a satisfactory rate of submission. Students who did not submit a photo online were able to have their photo taken and card made on attendance at the Main Library.

- No negative feedback about the impact on the 9 protected characteristics was received, nor or any Equality and Diversity issues were identified.

Update 2017: Evaluation of students arriving in September 2017:

- Card Services created 10,687 new student cards over 6 weeks from end July to first

week of September using digital images submitted online. A further 4,559 were produced on demand at the Main Library, with the image taken by web camera at the card distribution event.

- Small scale satisfaction surveys of new students reported over 90% satisfaction with the card services experience.

- 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 approval of digital images will be implemented with the correct support and procedures to ensure there is no potential for discrimination/less favourable treatment. Staff making the approvals will follow guidelines as to the conditions determining whether an image is acceptable or not, especially in cases where due to religious reasons the student wishes there face to be covered or where the individual is in the process of gender reassignment. In rejecting an image a reason has to be given from a select list or by free text entry. The student receives an email explaining the reason for rejection, with the invitation to submit a different image. The student would be able to challenge the rejection and Card Services managers would review. In addition, a routine sample quality review of rejected images will be undertaken by Card Service managers. Other than the approval process there should be no potential for discrimination as any student unable to use the online system for whatever reason would be able to request a form to be sent to them by email for them to print and attach a physical photograph and return by post to Card Services (similar to the existing paper based system) or would be able to get assistance from staff in person.

Update 2017: Students who prefer to attach a digital image to an email rather than upload the image through the channel are permitted to do so, giving another option to choose from.

- Are reasonable adjustments built in where they may be needed?

If the student is unable to be identified from their image due to them wearing protective head covers for religious purposes then senior staff trained in Equality and Diversity will be able to make a final decision on whether or not to accept the image and issue a University card.
In the event that a student had a religious or belief objection to a digital image or photograph being taken they would not have to submit/supply an image/photograph, and would be referred to Student Administration.
If digital image submission proves to be more difficult than supplying a physical photograph (for example no access to a digital camera), students will be able to request a paper form to be sent to them by email for them to print and attach a physical photograph and return by post to Card Services (similar to the existing paper based system) or get assistance in person from a member of staff.
All communications regarding this process will be available in alternative formats upon request.

- Does the policy/practice contribute to advancing equality of opportunity[2]? 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?

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

The practice contributes to advancing equality of opportunity as indicated in the preceding statements, summarised below:

- o **request for an image for Card use will be made by email, much quicker than a paper request from sent by mail; the return of an image will be electronic and not by post this will have an impact on those for whom travelling to a post box/office is a problem and will save the cost of postage..**
- o **a traditional camera will not be required to be used to take a physical photograph, nor will students have to obtain a photographic print; a wide range of devices have a digital camera which can be used to take an image, this will have an impact on those for whom travelling to obtain a suitable photograph is a problem.**
- o **the process for submitting an image for University card will be fully online, within the environment used for the application process and study of students and the system has been accessibility tested**
- o **Students can preview their digital image within the MyEd channel before submitting to self-assess the acceptability of the image for Card Services use;**
- o **there are no postal charges incurred by students (unless they opt to send a physical photograph);**
- o **a change of card image can be facilitated in certain circumstances, eg gender reassignment;**
- o **more students will be issued with a University Identity card in a timely and convenient way, with its attendant benefits to the card holder;**
- o **an alternative paper based method of returning a photograph can be offered to students unable to use the digital image submission process.**

By ensuring staff are informed of the Equality and Diversity issues related to this change and how to ensure no discrimination occurs, and by putting in place reasonable adjustments, the seriousness that the University places on Equality and Diversity issues is highlighted and the knowledge of staff regarding these issues improves.

- Is there an opportunity in applying this policy/practice to foster good relations between people in any protected group and those who are not[3]? Will it help to tackle prejudice and/or promote understanding?

This practice may assist to foster good relations with certain equality groups by increasing the likelihood that students will have a University Identity Card prepared in advance of arrival on campus in Edinburgh. It will also help students undergoing a gender reassignment process as they will be able to have an ID card that reflects their most current appearance. It will potentially enable some disabled users to obtain a University card with greater ease. This will show to students that the University considers Equality and Diversity in its processes.

- 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 system to be accessible and compatible with assistive technology. The system is only available in the English language, as this is the main teaching language of the University, and there should be no expectation that the system would be available in alternative languages.

- Is there evidence (or an expectation) of higher or lower uptake by any equality

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

group(s)? If so, give details of the differences and the reasons for these (if known)?

We have no expectation of a higher or lower uptake by any equality groups.

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

No. All equality groups will have access to the service. We have completed an accessibility evaluation of the online application to make sure it is as accessible as possible to disabled users and reasonable adjustments will be available for anyone unable to complete the online process for any reason e.g. students will be able to request a form to be sent to them by email for them to print and attach a physical photograph and return by post to Card Services (similar to the existing paper based system) or gain assistance from staff in person.

- 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 new practice should not create any barriers for any other groups as the digital image can be taken and submitted by the individual in their own time and should cost less than having a passport photo taken, printed and then posting it. The new practice will be communicated via the webpages which have been tested for accessibility and via pre-defined standard emails sent initially to the students personal email account used during application to the University course, and then to the student's University email account. The University Identity Card is sent by post with a standard covering letter. This letter will be available in alternative formats upon request. Communication about the new system will be available in alternative formats upon request. If a user does not have access to a computer or suitable camera device they will be able to complete the process in person on site so there should be no negative impact on those with restricted income.

Update 2017: Clarification: The University Identity Card is sent by post with a standard covering letter to online distance learners not living in Edinburgh. Students living in Edinburgh are expected to collect their card from the Main Library, or from University Accommodation Events & Catering accommodation during Welcome Week (cards are distributed to ACE halls and other accommodation on the Thursday before Welcome Week for the convenience of student residents). Post is an alternative methods of delivery should a student be unable to attend campus.

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

The Disability Information Officer for Information Services was consulted about any potential issues that might affect disabled users. The University Student Disability Service has been consulted and advise there are no further disability issues other than those raised and addressed above.
The University Chaplaincy has been consulted and this EqIA was referred to the Religion and Belief Advisory Group, which includes chaplains and other advisees from faith groups whose members wear head scarves and veils, and staff from the International Office and Student Administration. The Group did not foresee new issues arising from this change in policy, and believed that agreement could be reached on photographs that students are happy to submit and the University is able to accept. Should issues arise, the Religion and Belief Advisory Group is a body that is able to advise.
There has been no negative feedback to date from distance learners who have used the system.

The practice will be monitored and reviewed and equality groups consulted when any specific issues arise.

Update 2015: No negative feedback from students has been received and no specific issues have arisen.

Update 2017: No negative feedback from students has been received and no specific issues have arisen.

- 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 other issues other than those mentioned above .

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.

> **Evidence is provided in section G above.**

I Action and Monitoring

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

   Ensure all staff involved with the implementation of the practice have training on applying the criteria for approval of digital images. Service managers monitor rejections to assess this aspect of a quality service. In addition all staff involved in the process must be made aware of the reasonable adjustments as detailed in section 5.

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

   The practice will be monitored on an on-going basis with particular attention being paid to cases where digital images are rejected. An evaluation of the practice by surveying students will be conducted in Semester 2 2014/15. Representatives from particular equality groups will be asked for their feedback if we are aware of any potential issue in that area. All feedback will be monitored to consider any potential negative or positive impacts on any of the protected characteristics that have arisen.

Update 2015: An evaluation is contained in G 3 above. Monitoring will continue on an ongoing basis, but especially during the August to September intake of new students.

Update 2017: An evaluation is contained in G 3 above. Monitoring will continue on an ongoing basis, but especially during the recent August to September intake of new students. To date no negative feedback in relation to equality impact has been received.
Card Services has submitted an IS Innovation bid for consideration by IS Senior Management Team in October 2017, for funds to engage with students in order to review the digital card submission channel with a view to identifying any improvements that can be made to the text, guidance and presentation of the channel, and to review options for enhancing the preview function, as part of our continuous improvement programme.

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

   Within 6 months of implementation (ie prior to 31 March 2015).

   Update 2015: this EqIA will next be reviewed July 2016

   Update 2017: this EqIA will next be reviewed July 2019 since the service has now been running successfully for 2 full Sessions, and there have been no issues arising relating to Equality Impact. It will be reviewed sooner if signficant changes are made to the digital image submission channel or process, eg arising out of the Innovation fund project referred to above.

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)): **Barry Croucher, Head of Help Services**

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

Date: **18th September 2014** Date of Updating: 06th July 2015 **Date of updating:** 03 October 2017

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