

THE UNIVERSITY of EDINBURGH

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 <u>www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment</u>

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): The design framework EdGEL as a University service

Edinburgh Global Experience Language (EdGEL) is a digital experience framework that defines the look and feel, and behaviour of University digital systems, such as the University website or online student application processes. EdGEL is a community project to evolve a global experience language for The University of Edinburgh that will support developers to get things done better, faster and in compliance with legal requirements. EdGEL is purely about the design and interaction behaviours and does not cover any specific content. Its aim is to create a coherent and unified experience for end users.

Update 2019 – this is a review and update of the original EqIA Description has been updated as EdGEL is an evolving service and the previous version is now slightly out of date.

Edinburgh Global Experience Language (EdGEL) is a digital experience framework that defines the look and feel, editorial standards interaction behaviour of University digital systems, including websites, online services and email templates. EdGEL is a community project to evolve a global experience language for The University of Edinburgh that will support developers to get things done better, faster and in compliance with legal requirements. EdGEL sets out how elements of a digital experience should be presented and should behave, but does not dictate the nature of the digital system itself. Its aim is to create a coherent and unified experience for end users.

B. Reason for Equality Impact Asessment (Mark **yes** against the applicable reason):

- Proposed new policy/practice YES
- Proposed change to an existing policy/practice
- Undertaking a review of an existing policy/practice
- Other (please state):

Update 2019: Update to existing EqIA

C. Person responsible for the policy area or practice:

Name: Stratos Filalithis

Job title: Acting Head of Website & Communications

School/service/unit: Learning, teaching and Web

Update 2019: Name: Stratos Filalithis Job title: Head of Website and Communication Technologies School/service/unit: Website and Communications, Learning, teaching and Web, 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 YES
- 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**

Update 2019 – Review conducted by Bruce Darby, Project Manager, Website and Communications

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 partnership¹

The new design framework could have the potential to impact on all 9 protected characteristics as much of the output will be publically available, however, we believe the only real impact will be on disability.

The equality groups for which the policy/practice is particularly relevant is disability. This is because the new design may affect how disabled users access digital content while using assistive technology such as voice recognition software, screen readers or screen magnification software.

We feel that launching EdGEL as a service will have a similar positive impact as the University Website Policy has had. The GEL will help to ensure that digital design will be as accessible as possible for disabled users. Part of the work to launch the GEL involved a comprehensive accessibility review of all of the design elements and to correct any issues as soon as possible.

Staff at the University are aware of their obligation to provide reasonable adjustments when requested (e.g., content in an alternative format), and will continue to meet that obligation after the launch of the GEL as a service.

The web accessibility policy is publically available from http://www.ed.ac.uk/about/website/accessibility.

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.

Equality and Diversity is very much a part of the University's strategic plan. The University's Equality and Diversity strategy can be viewed at http://www.ed.ac.uk/equality-diversity/about/strategy-action-plan.

Update 2019 – Work is continuing to evolve the GEL to make it easier to access. A collaboration project started in Feb 2019 in Website and Communication team to improve documentation, communication and process mapping to help developers use and evolve the GEL. This is currently in very early stages of the project and this section may need to be updated later.

Add notes against the following applicable statements:

• On any available information about the needs of relevant equality groups: The University website currently uses many of the GEL components and is a good mechanism to receive feedback on any issues. There has been no significant feedback or complaints from disabled users, or any of the other 9 protected categories and we will continue to monitor this. We can use the same feedback mechanisms as the University website with some additional ones where relevant. However, we will need to contact these groups in due course to highlight the launch of the GEL as a service and to provide contact details of the service manager to enable any feedback to be passed on. The following groups will need to be contacted:

- Student Disability Committee and its Technology, Information and Communication Subgroup which includes student representatives.
- Disability, Accessibility and Technology Advisory Group
- Information Services Disability Information Officer
- The EdGEL steering group which has representatives from all Colleges and business units.

The GEL will use the Web Content Accessibility Guidelines version 2 AA as a standard. All design elements will need to conform to this standard and to any future updates. This means that the GEL will also need to the most commonly used assistive technology namely JAWS, ZoomText and TextHelp Read and Write.

Update 2019 – Please note – the list of groups of stakeholders is the same as above but should also include the following:

• EdWeb steering group which have representatives from all Colleges and business units.

The GEL will now use the Web Content Accessibility Guidelines version 2.1 AA as a standard.

As above we continue to use EdWeb as a way to monitor the use of the GEL. We have received feedback about the level of contrast for the auto-complete suggestions for the Funnelback search facility in Feb 2019. This is currently under review and action will be taken to amend this early 2019.

• Any gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed:

The groups mentioned above include disabled users that have provided us with feedback. At present we feel we have sufficient evidence to proceed.

Update 2019 – As EdGEL is used by some very high profile applications such as the University website we have access to more data to determine if the framework is having any negative impact on disabled users. Some of these include:

- Contact with committees
- Survey to our web publishing community
- Presentations to Web Publishing Community sessions

If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups:

We do not foresee that the rollout of this new design framework would lead to any forms of prohibited conduct. In fact, it is highly likely that this framework will reduce the chance of any potential discrimination by making digital content more accessible to all website visitors but especially disabled users.

Update 2019 – There has been no reports of the framework leading to any forms of prohibited conduct.

• If the policy/practice contributes to advancing equality of opportunity²

The new design framework should make the system more accessible to disabled users and therefore improve their ability to use and interact with the university website and applications. This will be due to elements passing accessibility checks before components can be added to the GEL. Any changes to these elements will also need to pass the same checks. This will reduce the number of ad hoc design concepts being created as any new digital application should use the GEL as is or go through a formal 'Request for Change' procedure.

Update 2019 – Additional projects are in place to help embed digital experience standards and processes that projects can follow to ensure that the correct standards are followed and this includes the use of the GEL. This builds on a project completed in late 2017 - <u>https://www.projects.ed.ac.uk/project/dti010</u>. While this project is now complete some future activities are still based on this work.

• If there is an opportunity in applying this policy/practice to foster good relations:

It is hoped that through consultation with users and by using their feedback to design the system we demonstrate Information Services and the Universities commitment to accessibility and to ensuring no forms of prohibited conduct occur against any of the 9 protected characteristics.

Update 2019 – We continue to promote both the use of the GEL and accessibility in general. This includes communication about legislation such as the 'Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018' e.g emails to staff about how to comply with the legislation, creation of guidance for the University at <u>https://edin.ac/2SGATWi</u>, and awareness raising at committee level such as the Web Governance Group.

A Web Strategy was proposed and accepted in late 2018 and includes accessibility as one criteria that needs governance over the whole University web estate. Promoting the use of the GEL will be one way to help web sites to meet accessibility requirements. A web audit was carried out twice in 2018 with the aim of creating a 'score card' feedback system to help govern and support the web estate. Software is being procured to aid the process and includes automated web accessibility checking. Information on the University Web Strategy - https://www.wiki.ed.ac.uk/x/yJBZFQ

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

The framework should not create any barriers as it will only help to create more accessible content and won't restrict this content in any way.

Update 2019 – no change to the above.

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

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

Communication regarding the rollout of the design framework will be done in a variety of ways and feedback will be gathered along the way. Training and supporting documents will also be made available to staff as another way of promoting and supporting web accessibility. These training events will be accessible and not discriminate against those with any of the protected characteristics. Communication will be via a variety of mediums – email, web notices, face to face meetings etc. All communication and training materials will be made available free of charge in alternative formats upon request.

Update 2019 – Please see updates above on the collaboration project started in Feb 2019 in Website and Communication team. Also the information on the University Web Strategy.

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

The University website currently uses many of the GEL components and is a good mechanism to receive feedback on any issues. There has been no significant feedback or complaints from disabled users, or any of the other 9 protected categories and we will continue to monitor this. We can use the same feedback mechanisms as the University website (an online form, consultation with the Student Disability Service and feedback from the monthly Web Publishers Community Session with editors and content owners of the University website) with some additional ones where relevant (EdGEL and EdWeb steering group with representatives of all Colleges and business units). However, we will need to contact the following groups in due course formally to highlight the launch of the GEL as a service and to provide contact details of the service manager to enable any feedback to be passed on. The following groups will need to be contacted:

- Student Disability Committee and its Technology, Information and Communication Subgroup which includes student representatives.
- Disability, Accessibility and Technology Advisory Group
- Information Services Disability Information Officer
- The EdGEL steering group which has representatives from all Colleges and business units.

Update 2019 – no change to the above.

• 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:

The new design framework has taken accessibility into consideration from the beginning – please see https://www.wiki.ed.ac.uk/display/EGELS/Design+principles for the project principles. Our expectation is that the framework design elements will make content easier to access for all users, particularly as the design takes into consideration the use of mobile phones and tablets.

As the design framework will be managed centrally, it is easier to control accessibility issues from the outset but also to respond quickly to any issues.

We will continue to promote accessibility as part of our training and support which we feel will continue to demonstrate the seriousness by which Edinburgh University takes the issues of Equality and Diversity and in particular the needs of disabled users and the desire to make digital content as accessible as possible.

Update 2019 – no change to the 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.

Option 2: Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.

Option 3: Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified

Option 4: Stop the policy or practice as there are adverse effects cannot be prevented/mitigated/or justified.

Update 2019 – no change to the 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).

As mentioned above, the following groups must be informed about this EqIA and recruited to help us monitor any equality impact:

The following groups will need to be contacted:

- Student Disability Committee (or its equivalent if this has been disbanded) and its Technology and Information Subgroup which includes student representatives,
- Information Services Disability Information Officer
- The EdGEL steering group which has representatives from all Colleges and business units.

We will continue to remind staff of the need to make reasonable adjustments and provide material in alternative formats free of charge.

Update 2019 – Please note – the list of groups of stakeholders is the same as above but should also include the following:

- EdWeb steering group which have representatives from all Colleges and business units.
- 2. When will the policy/practice next be reviewed? The EqIA will be reviewed yearly. The next review will be due in November 2018.

Update 2019 – The next review will be due in August 2020 (or when any significant changes are to be implemented if this is earlier)

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)): Bruce Darby, Project Manager, Website and Communications

Accepted by (name): Stratos Filalithis, Head (acting) of IS LTW Website & Communications Date: 15/11/2017

Update 2019 – EqIA undertaken by (name(s) and job title(s)): Bruce Darby, Project Manager, Website and Communications

Accepted by Name: Stratos Filalithis Job title: Head of Website and Communication Technologies School/service/unit: Website and Communications, Learning, teaching and Web, Information Services Date – 16/08/19

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