



THE UNIVERSITY *of* EDINBURGH

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):

Practice: This is the replacement of 2 systems within the Office of Lifelong Learning Continuing Education system (OLLie) and Professional Development system (CuPiD). The current systems have reached end-of-life and a new system or systems are in the process of being procured.

Update 2015 –CuPiD has been discontinued as a business and no longer forms part of the development. Following an unsuccessful procurement, the decision was taken to build the system replacement in house.

The public facing element of the system OLL Book has not been fundamentally changed as part of the system implementation only the backend administration system which was OLLie and has been replaced with a new system developed in house

B. Reason for screening (delete as applicable):

- **Proposed new practice for a new third party system(s) Update 2015 – In house development of replacement to the legacy OLLIE back end processing platform**

C. Person responsible for the policy area or practice:

Name: **Maurice Franceschi**
Update 2015: Craig Middlemass

Job title: **Programme Manager**

School/service/unit: **IS Applications Project 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

If the answer to any of these questions is 'Yes', an EqlA 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 EqlA is required, note when/at what stage(s) and by whom EqlA will be carried out.
- If EqlA is not required, note plans for review, monitoring or other action (including the communication of any favourable equality impact).

EqlA will be carried out by the OLL team and reviewed on an annual basis. The EqlA will be conducted at the earliest stage possible and updated as the project develops.

Update 2015 – the EqlA has been considered as part of the in house development and updated accordingly.

F. Sign-off

Screening undertaken by (name(s) and job title(s)):

Maurice Franceschi : IS Applications Project Services

Update 2015: Craig Middlemass : IS Applications Project Services

Accepted by (name):

Maurice Franceschi : IS Applications Project Services

Update 2015: Craig Middlemass : IS Applications Project Services

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

Date: **Oct 2013 Last updated July 2015**

If EqlA 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 EqlA 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 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 practice are particularly relevant (which should be the main focus for EqIA)? On what aspects of equality does the practice particularly impact?

The new system(s) are currently in the process of being procured. Update 2015 The procurement was unsuccessful and as such an in house development to replace the legacy administration platform has been completed. The new application has been built in line with accessibility standards (Web Content Accessibility Guidelines v2 AA standard) replacing the legacy application which was not accessible. The backend continuing professional development (CuPiD) was removed altogether and the backend/administration side of the Office of Lifelong Learning system (Ollie) was replaced. The public facing element of the system OLL Book has not been fundamentally changed as part of the system implementation.

The main focus of the EqIA will be around the protected characteristics of disability and race. The online system must be accessible to disabled users and be compatible with assistive technology. With regards to race the application will only be available in English but as English is the main teaching language of the University we do not believe this should cause any disadvantage.

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 partnership¹

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 new system(s) is available to all Continuing Education (around 5-6 thousand) and staff (around 30) so are relevant to all protected characteristics under the Equality Act. Equally, however, it does not deliberately discriminate against any of these equality groups. It should be pointed out however that the students must be old enough to apply for a university course.

The customer facing part of the system OLL Book remains unchanged and continues to be supported by offline processes such as registering on a course via phone, email, post or in person. The main focus of the EqIA will be around the protected characteristics of disability and race. The online system must be accessible to disabled users and be compatible with assistive technology. With regards to race the application will only be available in English but as English is the main teaching language of the University we do not believe this should cause any disadvantage.

The back end administration platform has been built following current accessibility standards and has passed accessibility testing.

The system may also have a positive effect on other protected characteristics as the system now allows remote access to it – permitting staff to work from home which may be beneficial to the some individuals within the protected characteristics of pregnancy and maternity, disability and those with caring responsibilities

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.

The Disability Information Officer within IS will evaluate all the responses from suppliers regarding accessibility and then complete hands on testing of the systems to check their accessibility to disabled users. There will be a feedback process set up by OLL to ensure any comments regarding equality issues can be noted and followed up.

Update 2015 – IS applications have accessibility tested the new administration platform to ensure that it meets accessibility standards (Web Content Accessibility Guidelines version 2 AA standard). The development was carried out using Agile methodology which allowed users to test, feedback and have resolved development issues throughout the project. This will continue post go live as part of normal applications support. All feedback is monitored to ensure any comments regarding equality issues can be noted and followed up.

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.

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.

There is sufficient evidence to proceed and the continuing monitoring of the system will allow any problems to be addressed.

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?

If online system was not accessible to disabled users this might result in discrimination. However, we have instigated a robust testing process to ensure this system is as accessible as possible and have ensured there are other methods in place to ensure discrimination does not occur. Additionally offline processes are available for users to engage with who cannot access the web applications themselves. Although the system is only available in English as the main teaching language of the University is English and this system deals with University courses we do not believe it should create any disadvantage.

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

As well as the online booking system individuals can book in person or by phone or by post. The postal forms are available in alternative formats. All communication about the system is available in alternative formats upon request.

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?

The system will take account of the needs of disabled users as accessibility criteria are built into the procurement process which should hopefully in turn increase the number of applications from disabled users. It is hoped the accessible system might secure more applications from disabled students.

Update 2015 – The development allowed for accessibility testing. In addition, only the backend administration platform has changed this does allow more ready access for staff including flexible working where the previous application could only be accessed from their work's desktop pc.

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?

OLL encourages widening participation by attracting students from disadvantaged groups. This creates a more diverse student population which will foster good relations between different groups. The new system is accessible to disabled users and hopefully ensure more applications from disabled students and ensure the administration system is as accessible as possible for disabled staff which will

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

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

hopefully highlight the seriousness with which Edinburgh University considers issues of Equality and Diversity.

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?

The system will need to be fully accessible to disabled users and compatible with various forms of assistive hardware and software. There should be no expectation that the system is available in alternative languages as English is the main teaching language of the University.

The system is accessible and compatible with assistive hardware and software. Although the system is only available in English as English is the main teaching language of the University we do not envisage any disadvantage.

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)?

We do not expect any higher or lower uptake by any group.

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

No

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?

We are confident that the policy does not create any barriers. Students can apply for a course in 4 ways: in person (where normal office hours apply), by post, by telephone, or online where they can apply at any time.

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

Groups will be offered the facility to feedback any issues to the OLL reception (by phone, in person or online).

The development was carried out involving all staff users (as the customer facing element was not changed). Staff had the opportunity throughout to trial the application in the test environment and feed into the development. As this was an Agile development there were numerous opportunities for enhancements and feedback along the development lifecycle. All feedback from staff and students is monitored for any equality and diversity issues and acted on accordingly.

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.

All printed documents will be made available in alternative formats upon request and staff made aware that there is a requirement to provide these.

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.

Bidders have to attain a level of accessibility set by the procurement process and at this stage we do not believe that the new OLL system(s) will discriminate against any equality groups and will instead promote equality. Reasonable adjustments such as the provision of printed documents in alternative formats and the variety of methods in which an individual can apply should ensure that no users are discriminated against.

Update 2015 – The development was carried out in line with accessibility standards and was tested as part of the development. Reasonable adjustments continue to be made available for the provision of printed document in alternative formats and a variety of offline processes to allow users to engage with the service.

I Action and Monitoring

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

We will monitor any feedback on the system and remind OLL staff about the need to provide alternative forms of access for anyone unable to use the online system. Staff will be advised about the need to provide documents in alternative formats upon request.

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

An annual report will be presented to senior management on an annual basis. Any comments or feedback relating to the new online systems will be monitored to check for any possible equality implications.

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

Autumn of each year. Update 2015: where there is next a change to the policy or where there is any feedback received relating to any of the 9 protected characteristics.

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**

K. Sign-off

EqIA undertaken by (name(s) and job title(s)):

Maurice Franceschi Project Manager

Update 2015: Craig Middlemass : Project Manager

Accepted by (name):

Maurice Franceschi : IS Applications Project Services

Update 2015: Craig Middlemass : Project Manager

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

Date: 14th October 2013 update : 10th July 2015

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