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

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):

Title: Applying to join the Library (not Staff or Student) and obtaining a Library membership smartcard

Description: People who are not Staff or Students of the University of Edinburgh may apply to join the University libraries. Patron groups include Alumni, NHS Lothian Staff not teaching on University programmes, members of the public who join the Library as Reference Users, External Borrowers, SCONUL Access members from other HEIs, and others. There are currently approximately 6,000 library cardholders. At the moment, these patron groups apply using a web form and on approval at a Library Helpdesk they are given a paper identity or borrower card, and borrowers access their 'MyAccount' function in DiscoverEd using an Alma specific password. There are currently 4 types of paper Library cards in use: i. a green card issued to members of the public giving reference use of the libraries, e.g. for consultation of printed collections, with a physical photograph attached; ii. a yellow card issued to Alumni of the University giving reference use of the libraries, with a physical photograph attached; iii. a white card issued to Alumni of the University, NHS Lothian staff not teaching on University programmes, and external users who have borrowing privileges featuring a library barcode but no photograph; iv. a blue card issued to SCONUL Access external users who have borrowing privileges featuring a library barcode and no photograph. The change to policy/practice involves replacement of the web form which is used to apply for Library membership within the University libraries. Data collected on this new Self Registration web form to be reviewed in the Visitor Registration System by Library Helpdesk staff to approve/reject applications. Approved applications to create VRS records and real time updates to Identity Management (IDM)/ Card system/ Alma library management platform enabling Library staff to produce a University smartcard. The smartcard is of a unique design to distinguish it from the existing University card and serves as a Library membership card only, replacing existing paper membership cards, and enabling holders of the card to access libraries through card controlled doors and borrow books (if entitled to borrowing), giving improved security on campus and potentially enabling additional services to be delivered. An EASE account will be created giving EASE authentication to the 'My Account' function in DiscoverEd making this standard for all borrowers.

Update 2018: this is a review and update of the original EqIA

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

- Proposed change to an existing policy/practice

Update 2018: Update to existing EqIA

C. Person responsible for the policy area or practice:

Name: Barry Croucher

Job title: Head of Help Services

School/service/unit: User Services Directorate

Update 2018: Barry Croucher, Head of Help Services, User Services Directorate

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D. An Impact Assessment should be carried out if any if the following apply to the policy/practice, if it:

- affects primary or high level functions of the University **No**
- is relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' as set out in the Policy and Guidance)? **Yes**
- It is one which interested parties could reasonably expect the University to have carried out an EqIA? **Yes**

E. Equality Groups

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

- Age
- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership[1]

The policy/practice is relevant to all equality groups as it will apply to any member of the public or other library membership category (eg Alumni, SCONUL Access) wishing to join the Library as a member. The policy may potentially impact on the areas of race, religion and belief, disability and gender reassignment to the greatest extent because of the issue of photographic ID and a photograph being required for the smartcard, and replacement costs for lost/damaged cards and because the system is online.

Disability – we have tested the online registration system to ensure it is as accessible as possible and meets as far as possible the Web Content Accessibility Guidelines version 2 AA standard and is compatible with assistive technology. The change in process now means that users have their photos taken at the helpdesk which saves them going elsewhere to get passport photos etc which may have a positive impact on those with caring responsibilities and who may find accessing photo booths etc difficult. Reasonable adjustments such as assistance to complete the online form or alternative methods will be put in place for those unable to use the self-registration system. The Main Library helpdesk is located on the ground floor and the whole Main Library is fully accessible. For the convenience of users, the service is also available at the 8 site libraries.

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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.

Gender Reassignment – for individuals undergoing gender reassignment we will offer the opportunity to update the photo and card as required and as wished.

Religion/Belief – for any individuals who do not wish their photo taken on religious grounds or who cannot be identified by their photo because of religious head covers then a senior member of staff trained in Equality and Diversity Issues will make a final decision and ensure the matter is treated with respect and dignity.

Race- at the moment the online system is only provided in English, however if a user had difficulty using the system due to English not being their first language we would provide assistance to ensure they were able to complete the process.

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups:

The system has been tested for accessibility by the Information Services Disability Information Officer and we know that disabled users will require the system to be accessible in line with the Web Content Accessibility Guidelines Version 2 AA standard and to be compatible with assistive technology. We have also consulted with the Student Disability Service.

Verifying identity: There are no changes planned to the requirement for applicants for Library membership to validate their identity and address, eg by photographic ID, unless exempt (eg SCONUL Access membership is validated by the staff/student's home Higher Education institution). If a person 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 other evidence of identity.

Providing a photograph: The current policy/practice is for persons who are not already members of the Library (ie staff and students) who wish to join for reference use of the libraries are required to provide a physical photograph for attaching to a paper membership card. This cost is met by the user affecting persons from less wealthy socio-economic groups, and can be inconvenient to obtain for disabled users or the elderly or those with caring responsibilities who may find it difficult to leave the house to get a photograph taken, eg at a photo booth.

Under the new policy/practice all new members will have their photograph taken by web camera at a Library Helpdesk and held digitally at no cost and during the first library visit.

For those persons who object to a photograph being taken for religious or belief reasons, or because of gender reassignment, or if a person is unable to be identified from their image due to them wearing head covers for religious purposes, then a senior manager trained in Equality and Diversity will make the final decision.

Replacing lost/stolen/damaged smartcards:
The current policy/practice is that paper cards are replaced free of charge when required. This will change as all smartcard holders who report loss, theft or damage to a card requiring replacement will incur a charge of £10, as is standard for all library members including Staff and Students of the University. This would represent a new charge for library members and may have be detrimental to persons from less wealthy socio-economic groups: however, as stated the cost of providing a physical photograph is removed for reference users, and smartcards that are faulty or expired will be replaced free of charge. The initial card is free, as are cards issued on renewal of membership. In cases of extreme hardship a manager would have the power of discretion to waive the £10 fee.

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

The Library keeps the minimum data that is needed about its Library members and mainly relates to proof of identify and contact details (the exception being Alumni). There is no data on disability, or religion/belief or the other protected characteristics so we are unable to compare how the policy will affect the numbers from various protected characteristics applying for registration. However, we feel we have sufficient evidence at this stage to proceed.

There has been no negative feedback to date from applicants for Library membership who have used the existing web form.

Update 2018: There have been no complaints or feedback recorded about the new self-registration form.

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

We do not believe this policy will lead to any form of prohibited conduct. The issue of photographic ID to prove the identity of the applicant for Library membership has the potential to be discriminatory, however we have put in various safeguards and procedures to ensure this is avoided.

There is the potential for asking for photographic ID may exclude some groups – we have tried to make the range of acceptable photographic ID accepted as wide as possible : - driver licence, passport, bus pass/rail pass, institutional ID or national ID card. In addition in the event that a user may not have photographic ID we have allowed the backup option of senior manager's discretion to permit access.

Moreover, the intention to have a senior staff member trained in Equality & Diversity best practice make a final decision where applicants for Library membership raise an issue is intended to alleviate any potential negative impact. For example those users who are in the process of gender reassignment may not have photographic ID that is of a good current likeness and/or will include the individual's previous name. In a similar manner users of a particular religion and belief may require to cover the heads/faces and therefore not be recognisable by photo ID.

Update 2018 – we have no evidence or reason to suggest that this new policy has led to any form of prohibited conduct.

- If the policy/practice contributes to advancing equality of opportunity[2]

Providing a photograph:
Removing the requirement for Library reference members to supply a physical photograph when they apply and then renew membership may encourage persons from less wealthy 2 This question does not apply to the protected characteristic of marriage or civil partnership socio-economic groups, disabled users, the elderly or those with caring responsibilities to seek membership and to use the print collections and free electronic resources of the Library, encouraging lifelong learning and widening participation.

Access through controlled doors:

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

Currently, Library members who do not have a smartcard (ie all of the Library members for whom this new policy/practice affects) gain access to libraries which have door access control (the Main Library, New College Library, Law Library, and Moray House Library after 5pm and at weekends) by means of staff mediation. For example, at the Main Library which is by far the most heavily used Library, Library members must present their paper card to Reception staff who then open a glass door. This can lead to a wait while Reception staff deal with other users ahead of them in a queue, and is inconvenient, especially when making repeat entries in the same day. It can also cause problems for some disabled users who may have to stand and wait to be given access to the building. Once issued with a smartcard, these users will be able to access the library like everyone else by presenting their card to the proximity reader/magnetic reader which controls door access.

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

It is possible that Library memberships will rise as a result of the changes, for example due to the issue of a smartcard and the improved access this will entail. In this respect there could be more Library members with the 9 protected characteristics integrated into the Library community. By showing we have considered potential equality and diversity issues that may arise as a result of this change to policy we hope to demonstrate the commitment IS has to Equality and Diversity and the University as a whole.

Update 2018: Library memberships have increased from approximately 6,000 in 2017 to approximately 7,000 in 2018 though factors other than the issue of smartcards for library members may have influenced this rise.

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

No barriers are expected to be created.

The new self-service web form is available online from the University Library web pages (as is the existing web form). Prospective applicants for Library membership who do not have access to the internet may choose to apply using the web form on a Library kiosk PC set up for the purpose. An accessibility evaluation of the web form has taken place to ensure it is as accessible as possible to disabled users and complies with current accessibility guidelines such as the WCAG version 2 and is compatible with assistive technology. Reasonable adjustments will be available for anyone unable to complete the online process for any reason e.g. those who are not able to complete the web form on their own device or on a Library kiosk PC will be assisted to complete the application by a member of Library staff.

For those on low incomes we have removed the need to provide their own photo as this is done by a web cam at the helpdesk free of charge. The form 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.

The Visitor Registration System is widely used by Library staff and this will be the system used for approving/rejecting applications for membership, and for managing renewals by adding visits.

Update 2018 – We have no evidence to suggest that any groups experienced any barriers in using this nee form. We have received no feedback or complaints about this service.

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

The Library web pages that contain information on how to join the Library will be updated to coincide with the launch of the new policy/process. These pages are required to meet the University Web Accessibility Policy which is based on the Web Content Accessibility Guidelines Version 2 AA standard. Other means of publicity will be used to make the information widely available. In addition, early notification of the forthcoming change will be advertised there, and also by other available means, for example to the SCONUL Access user group, and the University Alumni and Development unit.

Information will be available in alternative format on request.

Update 2018: Webpages have been updated, communications to SCONUL Access user group and the University Alumni and Development unit have been made. We have received no requests for alternative formats.

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

The Disability Information Officer for Information Services was consulted about any potential issues that might affect disabled users. The policy will be monitored and reviewed and equality groups consulted when any specific issues arise. All feedback will be monitored for any positive or negative impacts on the 9 protected characteristics.

- Any potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations:

No further impacts other than those already identified above.

F. Equality Impact Assessment Outcome

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

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

For the reasons stated above
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. We believe the policy/process will not have any negative impact on any of the 9 protected characteristics. Where necessary reasonable adjustments have been put in place to try and ensure no disadvantage will occur.

Update 2018: As 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).

Staff will be informed about the need to offer reasonable adjustments such as the requirement that individuals unable to complete the online version via PC or kiosk will be able to complete a paper copy at the Helpdesk and the need to provide information in alternative formats upon request. Staff will be informed about the issue of photographic ID and providing a photograph and will be trained in good practice in Equality & Diversity. The accessibility evaluation of the web form will be kept under review and changes made where necessary

based on feedback. All feedback will be monitored to see if any issues regarding Equality and Diversity are being highlighted and any appropriate action taken.

Update 2018: All actions as detailed above will remain operational
2. When will the policy/practice next be reviewed?

Next review 12 months after implementation (February 2018) or when policy/practice is changed or updated significantly, whichever is sooner.

Update 2018: Next review will take place when the policy/practice is changed or updated significantly or when we receive any positive or negative feedback related to any of the nine protected characteristics.

H. Publication of EqIA

Can this EqIA be published in full, now? Yes

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

I. Sign-off

EqIA undertaken by (name(s) and job title(s)): Karen Stirling, Project Manager / Barry Croucher, Head of Help Services

Accepted by (name): Barry Croucher
[This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]
Date: December 2016

Update 2018: Paul Gorman, Deputy Head of Help Services, undertook the EqIA. Barry Croucher, Head of Help Services, accepted the EqIA

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