



Equality Impact Assessment

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

Equality impact assessment for the University of Edinburgh website design

A. Policy or Practice (name or brief description):

The University of Edinburgh is introducing a new design for its centrally managed, public facing website at www.ed.ac.uk.

The website is used by a significant number of people around the world every day. The following snapshot shows the volume of traffic to the ed.ac.uk domain in July 2015:
Unique users: 800,000
Unique page views: 4,400,000

Update 2016: this is a review and update of the original EqIA
Update 2017: this is a review and update of the original EqIA
Update 2018: this is a review and update of the original EqIA
Update 2019: this is a review and update of the original EqIA

B. Reason for screening (delete as applicable):

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

Update 2016: **Update to existing EqIA**
Update 2017: **Update to existing EqIA**
Update 2018: **Update to existing EqIA**
Update 2019: **Update to existing EqIA**

C. Person responsible for the policy area or practice:

Name: **Bruce Darby**

Job title: **Project Manager**

School/service/unit: **University Website Programme, Information Services**

Update 2016: Bruce Darby, Project Manager, University Website Programme, Information Services

Update 2017: Bruce Darby, Project Manager, Website and Communications, Information Services

Update 2018: Bruce Darby, Project Manager, Website and Communications, Information Services

Update 2019: Bruce Darby, Project Manager, Website and Communications, Information Services

D. Screening Analysis

1. Does the policy or practice affect primary or high level functions of the University? **YES**
2. Is the policy or practice relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' set out in the introduction above)? **YES**
3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? **YES**

E. Screening outcome

Equality Impact Assessment required: **Yes**

The EqIA will be conducted by Bruce Darby and edited as the project develops and goes live.

Update 2016 – Review conducted by Bruce Darby, Project Manager, University Website Programme

Update 2017 – Review conducted by Bruce Darby, Project Manager, Website and Communications

Update 2018 – Review conducted by Bruce Darby, Project Manager, Website and Communications

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

F. Sign-off

Screening undertaken by (name(s) and job title(s)): **Bruce Darby, Project Manager, University Website Programme**

Accepted by (name): Dawn Ellis, Director, University Website Programme

Update 2016 – Dawn Ellis has now left the University and has been replaced by Stratos Filalithis, acting Head of University Website Programme, who has accepted this EqIA.

Date: **04/09/2015**

Update 2017 – Stratos Filalithis, acting Head of Website and Communications, who has accepted this EqIA update.

Update 2018 – Stratos Filalithis, Head of Website & Communication Technologies, who has accepted this EqIA update.

Update 2019 – Stratos Filalithis, Head of Website & Communication Technologies, who has accepted this EqIA update.

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 University of Edinburgh is developing a new Drupal based Content Management System (CMS). This is a web browser based piece of software used by University of Edinburgh staff to create web sites. A separate Equality Impact Assessment (EqIA) is written to cover the CMS. Sites are being migrated from the old CMS Polopoly into the new CMS EdWeb in a phased approach. During this process the website pages are being updated to a new design. This design not only has a new look and feel but also has a new style of navigation and will be fully responsive. This means that the new website is designed to work on mobile phones and tablet computers.

The aspect that the new website could particularly impact is disability and race. We are testing the new website for any accessibility issues and this has been a high priority throughout the whole project. We have a highly skilled and knowledgeable development team who take accessibility into consideration when developing any new features of the website. A regular accessibility audit is carried out and fed back to the development team.

The migration phases are as follows:

Migration phase	Date	Number of sites	No. published pages	Progress
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1	October 2014	1	121	Complete
2	December 2014 – January 2015	14	606	Complete
3	March – May 2015	52	5418	Complete
4	June – October 2015	182	23,237	Ongoing Complete (updated 2016)
5	October 2015 – April 2016	131	21,696	Ongoing Complete (updated 2016)
Totals		394	51,078	

As we begin to migrate more sites, starting in March 2015, the impact will increase as the number of sites using the new design will increase.

Update 2016 – All sites successfully migrated into EdWeb. Many new sites have also been added as they join the central service. No significant issues were reported during or after the migration apart from those listed and addressed in item 2 below.

Update 2017 – Many new sites have also been added as they join the central service. No significant issues were reported during the previous year apart from those listed in section 2.

Update 2018 – Many new sites have also been added as they join the central service. No significant issues were reported during the previous year apart from those listed in section 2.

Update 2019 – Many new sites have also been added as they join the central service. No significant issues were reported during the previous year apart from those listed in section 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 statically has been shown to impact more on women).

The new design does have the potential to impact on all 9 protected characteristics as it will be publically available around the world however we believe the only real impact will be on disability and race. There will be an impact on race as web pages will mostly be in English however this is the main teaching language of the University.

The equality groups for which the policy/practice is particularly relevant are disability and race. This is because the new design may affect how disabled users access the website using assistive technology such as voice recognition software, screen readers or screen magnification software. We will ensure as far as possible that the new content management system promotes and facilitates compliance with the Web Content Accessibility Guidelines version 2 (<http://www.w3.org/TR/WCAG20/>). Race is a relevant characteristic in that the majority of the site is in English but English is the main teaching language of the University.

All content added to the website must not discriminate against any of the protected characteristics. Any content that was found to discriminate against any of the protected characteristics would result in severe disciplinary action. The University vision is a continuing commitment to equality and diversity for both students and staff. The University has a single equality strategy to ensure that equality and diversity are guiding principles in our pursuit of academic excellence. The introduction of this strategy coincides with the implementation of the Equality Act 2010 and builds on its principle of integrating equality and diversity in policy and practice.

We also have a new University web accessibility policy which we feel will have a positive impact on the website and help to ensure that the new design will be and continue to be accessible as possible to disabled users. There will continue to be a prominent feedback mechanism on every page. Staff at the University are aware of their obligation to provide reasonable adjustments when requested – e.g. content in an alternative format. The policy is publically available from <http://www.ed.ac.uk/about/website/accessibility>.

We believe that the impact will be positive as the new design has taken disability into consideration throughout the process. The design was outsourced initially to a design agency Headscape. One of the reasons they were chosen was due to how serious they take website accessibility and usability. The design is also much more flexible and is designed to work on mobile phones and tablets. We are seeing traffic using mobile devices increasing each year. By being responsive the website allows for greater flexibility and customisation by users viewing the site on mobile devices.

A design framework (Edinburgh Global Experience Language) has been completed as part of the design process. This framework is made up of web components that have been tested for web accessibility and are either fully accessible or highlight any issues or problems. The Edinburgh GEL is at <http://gel.ed.ac.uk> and will be fully available by October 2015. These components will be available for use by University staff and will encourage both a consistency of design across the University and help to ensure that all sites conform to high accessibility standards.

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.

The new design, in combination with the website accessibility policy should ensure that all content that is publically available will be made as accessible as possible. Current content that might not fully meet the guidelines in the new policy will be upgraded by staff as part of a regular viewing and updating of webpages.

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>. Equality and widening participation is one of the strategic themes of the University's strategic plan and can be seen on page 34 of the strategy document at <http://www.docs.sasg.ed.ac.uk/gasp/strategicplanning/201216/StrategicPlan201216.pdf>. The objectives of the theme include embedding equality, inclusion and diversity as fundamental principles throughout our community with strategies of ensuring staff have appropriate training and information in equality areas to prevent discrimination, make reasonable adjustments and promote equality of opportunity and also to ensure staff and students with particular needs have access to appropriate facilities and support.

Update 2016 – A number of changes have occurred to ensure that the website stays as accessible as possible:

- **Carousel functionality removed from homepage as this was not accessible.**
- **User feedback - Part of the new design for search was highlighted as being inaccessible due to font style and size. Some changes were made (bold removed, font size increased) to make this more accessible.**
- **User feedback - Heading size was questioned in the new design for search as being too big. However it was decided to leave this as is it the larger size would benefit people with a visual impairment.**
- **Accessibility testing - A number of colour contrasts were found to fail the AA WAC guidelines. All the colour contrasts in the design were changed to ensure that they complied with the guidelines.**
- **Secured funding from the innovation project fund to employ a student intern to research different methods of subtitling videos in order to create best practise guidance for the University along with recommendations for a University wide approach for the subtitling of publicly available videos. This is in direct response to the Web Accessibility Policy and to help ensure that public video are as accessible as possible on the University website.**

Update 2017 – A number of changes have occurred to ensure that the website stays as accessible as possible:

- **A regular audit is carried out (2 x yearly) using an automated service to give a quick check of a randomly selected set of web pages. Example audit at <http://bit.ly/2m3LdYt>**
- **Requirements gathering for enhancements for the Profile Content Type found some issues with the visibility of the keyboard focus for keyboard only users. One design element (accordion style menu in Profile Content Type) was found to have the focus missing completely. This is currently being addressed and should be deployed to the live service by June 2017. There are a number of flexible colour schemes that can be chosen for the website. It was found that some of these make the default keyboard focus too subtle. While the application is fully keyboard accessible the focus needs to be enhanced to fully comply with the WCAG 2.0 guidelines. This work is being assessed and will be addressed as part of the project to release the EdGEL design framework as a fully operating service.**
- **The EdGEL was not made fully available as it says in the original EqIA. See below for the work being carried out currently for EdGEL**
- **A design strategist has been employed to develop the EdGEL design framework as a fully operating service. This will include a full accessibility review of all EdGEL design elements and the results of the audit will be completed by May 2017.**

- A full manual accessibility audit of the website will be carried out immediately after the completion of the EdGEL accessibility audit to look in more detail at a representative sample of complete pages (rather than focusing on the elements) at their compliance to the WCAG 2.0 guidelines. This will also look at the resources associated with website content e.g. Video and the custom components that can be added to the website e.g. degree finder searches on the University homepage. The audit will be completed by July 2017.
- Following from the development of the University Web Accessibility Policy and the subtitling investigation project an Information Services Subtitling Pilot project started in February 2017 using the new centrally run media service Media Hopper. Approximately 40 people have signed up to the pilot and submitted over 600 minutes of video. The pilot is using the automated subtitling service and will be reviewed at the end of the pilot in June 2017.

Update 2018 – A number of changes have occurred to ensure that the website stays as accessible as possible:

- A regular audit is carried out (2 x yearly) using an automated service to give a quick check of a randomly selected set of web pages. Example audit at <http://bit.ly/2GRTI5p>.
- The EdGEL framework is fully available. Work continues to get more resource to run this as a fully supported service for the University.
- A design strategist was employed to develop the EdGEL design framework as a fully operating service. A full accessibility review of all EdGEL design elements was carried out and the results of the audit are available on request. A number of elements were found to fail the AA WCAG 2.0 standards. These were:
 - Missing or difficult to see keyboard focus.
 - The colour contrast between background and font colour for one of the site wide colour themes does not pass the AA standard.
 - Search and Schools & departments links are not accessible by a screen reader or by the keyboard alone when page content is zoomed to the maximum font size.
 - An alt attribute is missing from the download icon.
 - Some links are formed with a space character at the beginning.

Development resource was secured to fix all issues.

- A full manual accessibility audit of the website was carried out to look in more detail at a representative sample of complete pages (rather than focusing on the elements) at their compliance to the WCAG 2.0 guidelines. No significant issues were found. Accessibility of resources was looked at and it was found that most video did not have any subtitling although many did have full transcripts. See below for more information on how the University has started to tackle this.
- Following from the development of the University Web Accessibility Policy and the subtitling investigation project an Information Services Subtitling Pilot project successfully completed using the centrally run media service Media Hopper. Many hours of video were successfully subtitled and made publically available. A report and recommendations will be submitted to the University ISG senior manager's team meeting in May 2018. The recommendation is that all videos added to the Media Hopper service will be subtitled using the automated service.
- There is a project in progress to set up a new Web Governance framework to audit and monitor the whole of the University web estate (incl. EdWeb) regularly and report back to a Web Governance Group. A web estate audit has already been carried out and is feeding into this project. Accessibility has been included as one of the areas to report and will continue to do so alongside other critical factors such as security. This could lead to sites being updated or even shut down as necessary. This audit information will be helpful in understanding University of Edinburgh websites' accessibility performance, and raise the

value of having a Web Accessibility policy in place as well as informing further EdWeb development.

Update 2019

A regular audit is carried out (2 x yearly) using an automated service to give a quick check of a randomly selected set of web pages. Example audit at <http://bit.ly/2F7QDdg>

- An additional accessibility audit of the website is carried out using the WAVE accessibility evaluation tool to look in more detail at a representative sample of complete individual pages for their compliance to the WCAG 2.1 guidelines.
 - 4 issues were detected and are in the process of being fixed:
 - Funnelback search has added a hidden drop down menu field to accommodate the auto-complete suggestions. This doesn't have an attached label so fails WCAG 2.1 criteria.
 - Undergraduate search field doesn't have an associated label. This is because the HTML purifier strips out the ID attribute.
 - Postgraduate search field doesn't have an associated label. This is because the HTML purifier strips out the ID attribute.
 - Funnelback search auto-complete suggestions does not have a sufficient colour contrast in the search text field.
- New legislation has come into force - Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. This highlights the need for a web accessibility statement and for web site resources e.g. video to be accessible as well as site content. The EdWeb web accessibility statement is reviewed every 6 months. It looks likely that an official statement template will be published by the UK government. Once this is released the EdWeb statement will need to be updated to comply. Also any known accessibility issues must be reported in the statement so this is currently outstanding.
- A second Information Services Subtitling Pilot project started in October 2018 using the University media service Media Hopper. The aim of the project is review processes and look to set up and fund a sustainable subtitling service for the University. The pilot is using the automated subtitling service but with the addition of employed student helpers to correct any errors and will be reviewed at the end of the pilot in summer 2019. This is important due to the fact that web resources must be accessible as well as the web site content as well.
- 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. A comprehensive 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. A number of sites have been or are in the process of being retired which will improve the quality of 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>
- A new Head of Web Strategy has now been appointed for an additional 2 year post starting May 2019. Processes are being put in place to govern the University's web estate in order to continue to lower any risk in relation to non-compliance, for not fulfilling its obligations to certain legislation or that could damage its reputation.
- The Web Content Accessibility Guidelines version 2.1 AA is now the standard that will be used by the University website. The site is being reviewed to see if there is any impact from these new standards and if any remedial action is needed.

- 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.

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.

Although there has been no significant feedback or complaints from disabled users, or any of the other 9 protected categories, we will continue to monitor this. It is planned to enhance the feedback mechanisms available to users which should raise the profile and importance of visitor feedback. All feedback from users will be gathered and analysed to note any potential unexpected positive or negative impacts that need to be addressed.

A number of stakeholders will be asked to contribute to collecting feedback:

- Student Disability Committee and its Technology and Information Subgroup which includes student representatives,
- Information Services Disability Information Officer
- The Disabled Computing Support group who support disabled students.

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

We have the Web Content Accessibility Guidelines version 2 AA as a standard.

Update 2016 – Please see above section for some changes due to user feedback. Other than these comments there were no other comments related to any of the protected characteristics including race.

Update 2017 – Please see above section for some changes due to accessibility audits and requirement gathering. Other than these there were no other comments/complaints related to any of the protected characteristics including race.

Update 2018 – Please see above section for some changes due to accessibility audits and requirement gathering. Other than these there were no other comments/complaints related to any of the protected characteristics including race.

When the Web Content Accessibility Guidelines is updated to 2.1 a review of the updates will need to be carried out. It is likely that some work will be needed to update the website to comply with the new guidelines.

**Please note – the list of groups of stakeholders has been updated to the following:
These are consulted as and when needed. Regular updates are given to the groups.**

- **Student Disability Committee and its Technology, Information and Communication Subgroup which includes student representatives.**
- **Disability, Accessibility and Technology Advisory Group**
- **EdGEL and EdWeb steering groups**

Information and consultation takes place with Information Services Disability Information Officer as and when needed.

Update 2019 – Please see above section for some changes due to accessibility audits and requirement gathering. Other than these there were no other comments/complaints related to any of the protected characteristics including race. The Web Content Accessibility Guidelines version 2.1 AA is now the standard that will be used by the University website.

- 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?

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

Update 2016 – we do not believe that the new design has led to or will lead to any forms of prohibited conduct.

Update 2017 – we do not believe that the new design has led to or will lead to any forms of prohibited conduct.

Update 2018 – we do not believe that the new design has led to or will lead to any forms of prohibited conduct.

Update 2019 – we do not believe that the new design has led to or will lead to any forms of prohibited conduct.

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

As we work closely with our publishing community we will be able to monitor the demand for reasonable adjustments. While the demand for reasonable adjustments for the website is thought to be low the University has a lot of experience and is very good at providing reasonable adjustments for staff and students in their academic and working life. Therefore we feel that these processes and procedures would be used if adjustments were requested for the website. Reasonable adjustments would of course also be made to members of the general public if requested.

The web accessibility policy clearly states that additional alternative formats of webpages will need to be supplied if requested.

Information on creating accessible formats can be found on the Information Services website at <http://www.ed.ac.uk/information-services/help-consultancy/accessibility/creating-materials>.

Update 2016 – There have been no reports of any increase in demand for reasonable adjustments to website content or resources. There have been no reports of requests for content or resources in alternative formats.

Update 2017 – There have been no reports of any increase in demand for reasonable adjustments to website content or resources. There have been no reports of requests for content or resources in alternative formats. However we should be more proactive in reviewing this demand and the web publishing community will be surveyed to see if there has been any requests for adjustments. We should also state this more explicitly on our website that alternative formats are available. This will be completed before the start of the next academic year 17-18.

- It is possible to use Google Translate (<https://translate.google.com>) to translate the website into other languages. Just enter the web address into the text area and select the desired language.
- There is also a link to the BBC accessibility guidelines from <http://www.ed.ac.uk/about/website/accessibility/customising-site> that explains how to customise websites e.g changing background colour, increasing font size, text to speech functionality.

Update 2018 – There have been no reports of any increase in demand for reasonable adjustments to website content or resources. There have been no reports of requests for content or resources in alternative formats. Enquiries into reasonable adjustment is regularly made at the monthly Web Publishers Community sessions (e.g. 18 April 2018) and emails have been sent to the full web publishing community (10/05/2017, due to be sent out 01/05/2018).

Update 2019 – There have been no reports of any increase in demand for reasonable adjustments to website content or resources. There have been no reports of requests for content or resources in alternative formats. Enquiries into reasonable adjustments is regularly made at the monthly Web Publishers Community sessions (Due April 2019) and emails have been sent to the full web publishing community (Due to be sent out April 2019). The web accessibility statement has been updated with new information about customising the University website. The link to the BBC guidance removed as this was getting very out of date.

- 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 new design has taken accessibility into consideration from the beginning. Our expectation is that the new design will be easier to use for all website visitors especially as the design takes into consideration the use of mobile phones and tablets.

As the website is managed centrally it is easier to control accessibility issues from the outset but also to respond quickly to any issues. This central management combined with the web accessibility policy means we believe that this will contribute to advancing equality of opportunity. The University Website Programme will promote the web accessibility policy at every opportunity to give out a strong message that the University enforces accessibility to meet the needs of different equality groups. It will also lead to the provision of support, training, documentation and guidance on how to implement web accessibility so that all websites being built will always take account of a disabled person's impairments. In this way it is hoped that these measures will increase participation by encouraging more disabled users to access the website.

Update 2016 - Secured funding (From Technology, Information and Communication sub-group of the Disability Committee) to start a short series of advanced web accessibility training sessions for technical staff to enable developers to start using techniques to enhance the accessibility of web applications immediately. Target of training 60 people currently in progress. This is part of general program to lead in the provision of support and training for web accessibility across the University.

Update 2017 - Advanced web accessibility training sessions for technical staff as mentioned went ahead and successfully trained approx. 60 people.

Update 2018 – The Web Accessibility Policy will be updated to refer to the latest version of the Web Content Accessibility Guidelines instead of to a specific version in readiness of the update to version 2.1. Work will commence to make sure that key staff are up to date with what these changes are and the potential impact for the University.

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

Update 2019 – The Web Accessibility Policy has been updated to refer to the latest version of the Web Content Accessibility Guidelines since the update to version 2.1. Work has commenced to make sure that key staff are up to date with what these changes are and the potential impact for the University with presentations at various key events.

- 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?

We will continue to promote accessibility as part of our training and support for the web publishing community which we feel will continue to demonstrate the seriousness by which Edinburgh University takes the issues of Equality and Diversity and in this case in particular the needs of disabled user and the desire to make the websites they use as accessible as possible and to mainstream as many adjustments as possible.

Update 2016 – There have been a number of presentations at the Web Publishing Community sessions highlighting web accessibility and the University Web Accessibility Policy in particular e.g.

Subtitling presentation -

<https://www.wiki.ed.ac.uk/display/UWP/Web+Publishing+Community+Session+28+October+2015>.

These presentations aim to increase knowledge and understanding and also promote good practice around the University.

Update 2017 – Subtitling pilot project is raising awareness of the need to make website resources accessible as well as the website and content itself.

Update 2018 – Presentations continue at Web Publishing Community sessions as part of our regular CMS update e.g. [May 2017 CMS update](#)

Subtitling pilot project finished and report and recommendation taken to ISG senior management meeting.

Update 2019 – Presentations continue at Web Publishing Community (WPC) sessions as part of our regular CMS update e.g. [Feb 2019](#), [Nov 2018](#), [Oct 2018](#)

New subtitling pilot project started and a comms strategy is being create to disseminate these results. (See Nov WPC session above)

Presentation to Web Governance Group in March 2019 to raise awareness of the new legislation that has come into force - Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. This highlights the need for a web accessibility statement and for web site resources e.g. video to be accessible as well as site content. The EdWeb web accessibility statement is reviewed every 6 months. It looks likely that an official statement template will be published by the UK government. Once this is released the EdWeb statement will need to be updated to comply. Also any known accessibility issues must be reported in the statement so this is currently outstanding.

- 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?

There could be an expectation that websites should be translated into different languages. However there is an acceptance that University business is carried out in English as this is the main teaching language of the university.

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

Disabled users will expect the website to be accessible and comply with the Web Content Accessibility guidelines version 2.

- 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 difference in use of the webpages by any equality group. Accessible web pages are often more useable web pages and therefore the new design is likely to benefit all users.

Update 2016 We have no evidence that the website is used more or less frequently by any one equality group.

Update 2017 We have no evidence that the website is used more or less frequently by any one equality group.

Update 2018: We have no evidence that the website is used more or less frequently by any one equality group.

Update 2019: We have no evidence that the website is used more or less frequently by any one equality group.

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

No, no equality group will be excluded by implementation of the policy.

Update 2016 – there has been no evidence to suggest that any equality group has been excluded.

Update 2017 – there has been no evidence to suggest that any equality group has been excluded.

Update 2018 – there has been no evidence to suggest that any equality group has been excluded.

Update 2019 – there has been no evidence to suggest that any equality group has been excluded

- 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 policy should not create any barriers as it will only create more accessible content and won't restrict this content in any way. Communication regarding the rollout of the design 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. The University offers free computer access to all staff and student 24 hours a day and most public libraries offer free computer access to members of the general public.

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

We will recruit and test the new design with disabled students and disabled members of staff. Testing is scheduled for October 2015.

All feedback from users will be gathered and analysed to note any potential unexpected positive or negative impacts that need to be addressed.

Update 2016 – This is still outstanding. Recruitment of disabled students has been attempted but it was not considered to be a good time because of student work loads due to the start of Semester and for the Student Disability Service who were extremely busy. This does need to be reinstated again in the near future. Early 2017 is likely to be a much better time.

Update 2017 – Recruitment of disabled students will start during 2017 for user testing as a final part of the EdGEL accessibility audit and the full website accessibility audit. This will be completed by July 2017.

Update 2018 – Recruitment of disabled students has proved quite difficult so is still ongoing. However some user testing was completed on a visually impaired member of staff.

Update 2019 – Recruitment of disabled students has proved quite difficult so is still ongoing. However some user testing was completed on a disabled members of staff. Also testing with screen readers and other assistive technology by experts is ongoing and mitigates some risk.

- 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.

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.

Accessibility of the new website design has been taken into consideration throughout the project. We will continue to gather feedback and will respond and make changes where this is needed. The website is not static and we plan to add improvements over time. With the introduction of a web accessibility policy we feel that the process is robust enough to proceed. We will continue to promote and support web accessibility throughout the University.

I. Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.
 - Monitor and respond to all website visitor feedback.
 - Undertake user testing of the website and make any changes to the design that are needed.
 - Promote the University web accessibility policy and continue to develop support and guidance.

- Assess current content to check where it might not fully meet the guidelines of the web accessibility policy and support staff to upgrade and improve this content.

Update 2016 – continue to review feedback and comments

Review the findings from the subtitling project and take appropriate action as required.

Undertake disabled user testing

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

Please see the actions above.

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

The design will be reviewed in July 2016

Update 2016 – Design has been reviewed but no significant changes have occurred during the past year. Changes are likely to occur now going forward so this should be reviewed again in July 2017.

Update 2017 – Design has been reviewed but no significant changes have occurred during the past year. Changes are likely to occur now going forward so this should be reviewed again in January 2018.

Update 2018 – Design has been reviewed but no significant changes have occurred during the past year. Changes are likely to occur now going forward so this should be reviewed again in January 2019. However if significant design changes happen before this time the review will need to happen earlier. There is a project in place to start planning the move of the Content Management System from Drupal 7 to Drupal 8. While this won't necessarily have an impact on the front-end design it is unlikely that there will be no design changes at all.

Update 2019 – Design has been reviewed but no significant changes have occurred during the past year. As above changes are likely to occur going forward so this must be reviewed as appropriate. Planning continues on the move of the Content Management System from Drupal 7 to Drupal 8. While this won't necessarily have an impact on the front-end design it is unlikely that there will be no design changes at all. However a full review can be carried out January 2020.

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)): Bruce Darby, Project Manager, University Website Programme

Accepted by (name): Dawn Ellis, Director, University Website Programme

Date: **04/09/2015**

Update 2016 –Bruce Darby, Project Manager, University Website Programme undertook the EqIA and Dawn Ellis has now left the University and has been replaced by Stratos Filalithis, acting Head of University Website Programme, who has accepted this EqIA.

Update 2017 - Bruce Darby, Project Manager, Website and Communications undertook the EqIA. Stratos Filalithis, acting Head of Website and Communications, has accepted this EqIA.

Update 2018 - Bruce Darby, Project Manager, Website and Communications undertook the EqIA. - Stratos Filalithis, Head of Website & Communication Technologies, has accepted this EqIA.

Update 2019 – Bruce Darby, Project Manager, Website and Communications undertook the EqIA. - Stratos Filalithis, Head of Website & Communication Technologies, has accepted this EqIA.