

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

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 <u>equalitydiversity@ed.ac.uk</u> 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): University Collections Online (the online presence of the Centre for Research Collections at the University)- Information Services

B. Reason for screening (delete as applicable):

• Proposed new policy/practice

C. Person responsible for the policy area or practice:

Name: Joseph Marshall

Job title: Head of Special Collections and the Centre for Research Collections

School/service/unit: Library and University Collections

- 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 EqIA should be carried out on the proposed/revised policy or practice at an early stage and in any event before it is finalised.

E. Screening outcome

Equality Impact Assessment required: Yes

Record notes about the screening process or outcome here.

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

The EqIA has been developed and updated throughout the design process

F. Sign-off

Screening undertaken by (name(s) and job title(s)): Claire Knowles, Library Digital Development Manager

Accepted by (name): Joseph Marshall, Head of Special Collections and the Centre for Research Collections

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

Date: January 2018

If EqIA is not being carried out, delete the remainder of this form and send the completed form to <u>equalitydiversity@ed.ac.uk</u>.

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 Collections Online website and its sub-sites collections.ed.ac.uk/mimed and collections.ed.ac.uk/art aim to make the University's rare and unique collections available online. The website functionality includes the ability to browse and search for items and then see information and images of an individual item. This site will be available to the public, staff and students.

We would recommend that this EqIA be read alongside the following EqIA's

- IS Historic Collections digitalisation Strategy - <u>http://www.docs.csg.ed.ac.uk/EqualityDiversity/EIA/IS-Historic Collections-</u> <u>Digitisation Strategy.pdf</u>
- IS Centrally managed public facing website - <u>http://www.docs.csg.ed.ac.uk/EqualityDiversity/EIA/IS-</u> <u>University Centrally Managed Public Facing Website.pdf</u>

- IS Web Accessibility Policy <u>http://www.docs.csg.ed.ac.uk/EqualityDiversity/EIA/IS-University_Centrally_Managed_Public_Facing_Website.pdf</u>
- 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).

As this website will be available to anyone with internet access it has the potential to impact on all nine protected characteristics but we feel the ones most likely to be impacted are race, disability and religion.

As this is an online system a key focus of the EqIA will be around the requirements of disabled users and the need for the system to be as accessible as possible and compatible with the main forms of assistive software, (specifically meeting as far as possible the current version of the Web Content Accessibility Guidelines AA standard as specified but the University Web Accessibility Policy).

The webpages are only available in English but as this is the main teaching language of the University and as many browsers now offer a translation facility for web pages we do not envisage that this should lead to disadvantage.

The content included on the collections website must also be considered in terms of sensitive images such as religious images such as Mohammed which may be prohibited by specific religions. Due care and attention will be taken with regard to this matter if any materials are identified which might cause issue or offence to specific religions/beliefs.

There is a potential positive effect for some disabled people and those with caring/parental responsibilities as the collections being online means they can be accessed at any time and from any location with internet access and so users no longer need to visit the Centre in person to access materials.

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.

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 Library Digital Development Team have worked closely with the curators of the collections to identify best practice in the display and searching of the collections. We will monitor feedback received from users and will run a session with students in the Main Library. The Information Services Disability Information Officer (IS DIO) has completed a detailed accessibility review of portal and will continue to review the accessibility of all new developments.

Where are the gaps in evidence? If there is insufficient information to properly assess the policy, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the policy/practice. Note: the resources put into collecting evidence should be proportionate to the relevance of the policy/practice to equality.

At this stage we feel we have sufficient evidence to proceed.

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?

We do not believe the application will lead to any form of prohibited conduct. Were for any reason a user is unable to access the web pages the information can be provided free of charge in an alternative format as a reasonable adjustment on request.

- 5. Are reasonable adjustments built in where they may be needed? If an individual is unable to use the online system they will be able to contact the Centre for Research Collections for the information to be provided for them in an alternative manner upon request free of charge.
- 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?

Collections online is designed to make it easier for users who cannot access the physical items by visiting the University to have access to information about and images of the items within the University's rare and unique collections. It also provides a catalogue of the different collections to enable users to make informed enquiries. We hope that this will increase participation from several groups with protected characteristics including disability, maternity and pregnancy and sex (especially those with caring responsibilities) where it might be more problematic for them to visit the site in person. The site has been checked for accessibility and compatibility with assistive technology and staff made aware of the need to make reasonable adjustments if necessary.

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

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?

Making this information available online will help those who are unable to visit the University Reading Rooms and Museums to have access to our collections. This will make the items potentially more accessible to those with caring/parental responsibilities and to some disabled users. By ensuring that reasonable adjustments are in place and that the online system is as accessible as possible we hope that this will demonstrate the seriousness with which the University takes the 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?

A proportion of disabled users will require the system to be accessible (in terms of current WCAG version 2 guidelines) and to be compatible with assistive technology. We are also aware that special care and discussion will be required over sensitive images such as those of the Mohammed where the publishing of such images is offensive to specific religious groups.

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)?

There is no evidence or expectation of this.

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

We do not envisage that any equality group will be excluded from using the online service and have taken such steps to minimise this possibility such as ensuring the website is as accessible as possible.

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 do not believe that the policy should create any barriers. The University offers free 24-hour access to computers for staff and students so even those users without their own access to the internet should be able to access the site as required.

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

The Information Services Disability Information Officer has reviewed the accessibility of the website for disabled users. In addition all feedback will be monitored and acted upon to ensure there is no negative impact on any protected characteristics.

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

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

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.

For the reasons detailed above.

I Action and Monitoring

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

CRC Staff will be informed of the requirement to provide individuals unable to access the online version the information in an alternative format and to make any other reasonable adjustments as required.

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

All feedback will be monitored to see if any issues regarding equality and diversity are being highlighted.

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

Anytime the system goes through a major upgrade, when a new sub-site is released or when we receive any positive or negative feedback related to any of the nine 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/No

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)): Claire Knowles, Library Digital Development Manager

Accepted by (name): **Dr Joseph Marshall, Head of Special Collections and the Centre for Research Collections**

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

Date: October 2018

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