



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.

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| A. Policy or Practice (name or brief description): Roll out of Windows Eyes software to all University networked PCs |
| B. Reason for screening (delete as applicable): <ul style="list-style-type: none">Proposed new policy/practice Update 2015: review of policy and update to EqIA. |
| C. Person responsible for the policy area or practice: Name: Jessie Paterson Job title: Convenor of the Technology and Information Sub Group Committee School/service/unit: Technology and Information Sub Group Committee |
| 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. <ul style="list-style-type: none">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 will be conducted prior to the rollout of Windows Eyes across all University Network PC's and will be conducted by Viki Galt, the Disability Information Officer for Information Services |
| F. Sign-off Screening undertaken by (name(s) and job title(s)): Viki Galt, Disability Information Officer for Information Services Accepted by (name): Jessie Paterson, Convenor of the Technology and Information Sub Group of the Student Disability Committee [This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.] Date: 10.11.14 Update 2015: Screening undertaken and accepted by above |

If EqIA 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 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.

1. 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?

At present we are just about to roll out the software package Windows Eyes to all University Networked PCs. This will make the software available to all staff and students. Windows Eyes is a screen reader which may be of particular benefit to disabled users with visual impairments or (less likely although possible to those with specific learning disabilities such as Dyslexia. As we intend to add this software to the suite of assistive software we provide rather than replacing any other screen reading software we currently provide we would foresee that this change should have a purely positive benefit. We will communicate the change by a variety of methods in order to ensure users are aware of this new development.

Update 2015: There has been little use of Windows Eyes since implementation regarding accessibility to either the IS Helpline or to Student Disability Services. In addition, there has been no positive or negative feedback related to any of the 9 protected characteristics.

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).

This change is likely to have greatest impact on disabled users as it is a piece of assistive software that we are making available on all University networked PCs. We envisage that this impact will be entirely positive as we are not removing any other services or pieces of software but adding in an additional piece of software that may be of assistance. The software has the potential to impact on all 9 protected characteristics as it will be available to all staff and students; however we believe the only real impact will be on disability. The software will only be provided in English but as English is the main teaching language of the University we do not believe that this will cause any disadvantage.

Update 2015: there has been no positive or negative feedback received about this service (including the fact the software is only provided in English) other than some anecdotal comments made to the Student Disability Service.

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.

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.

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.

We did not feel it was proportional at this stage to run focus groups with disabled users as we had anecdotal evidence from the Student Disability Service that rolling this software out would be useful. The Student Disability Committee have reviewed and approved this change and the software has been tested for accessibility by Viki Galt the Disability Information Officer for Information Services. All feedback from users will be gathered and analysed to note any potential unexpected positive or negative impacts that need to be addressed.

Update 2015 – feedback is monitored on an ongoing basis and acted on accordingly.

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 foresee that the rollout of the software would lead to any of the aforementioned and in fact reduce the chance of any potential discrimination by mainstreaming a piece of assistive software so that it is accessible by all University networked PC users.

Update 2015 - There is no evidence to suggest that the rollout of this software has led to any form of prohibited conduct and if anything has had a positive effect by allowing users access to a further form of assistive software which may be particularly beneficial to some disabled users.

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

We do anticipate a need for many reasonable adjustments as the rollout of Windows Eyes across the University networked PC's is in effect the mainstreaming of an adjustment. However, if there were users who needed additional assistance in using the package we would provide this as a reasonable adjustment.

Update 2015 – we have had no request for any reasonable adjustments since and in regard to the rollout of the software

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?

We believe the rollout will help to achieve all four points above by ensuring mainstreamed provision of a piece of assistive software to all network computer users at the University at no cost so allowing access to a screen reader/text to speech facility which may benefit a wide range of individuals including those with visual impairments and those with specific learning difficulties.

Update 2015 – we hope that this software had helped disabled users and is seen a positive step in mainstreaming. There has however been very low usage of the software so the positive effect may be limited.

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?

We hope that by rolling this software out we will demonstrate the seriousness by which Edinburgh University takes the needs of disabled users and the desire to make their systems as accessible as possible and to mainstream as many adjustments as possible.

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.

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?
There may be some expectation from disabled users who have used other screen readers before, however there is no intention for this software to replace other assistive software the University provides such as JAWS, TextHelp Read and Write and Zoomtext so this change will merely increase the choice available to students with the added benefit that it will be available on all networked PCs.

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 would expect more disabled users to use the software than non-disabled users, given the nature of the software. However the software is available to all and many non-disabled users may find the software of use as well.

Update 2015 – There has been very little take up of the software and we are only able to see total usage numbers so impossible to tell if there has been higher or lower uptake by any equality group but we would expect a higher uptake from disabled users. However, we feel offering the service will have had a positive effect on increasing accessibility.

10. Is any equality group excluded from participating in or accessing the service or functions? If so, why?
No. No equality group will be excluded the software will be available to all University networked users.

Update 2015 – there is no evidence to suggest any group has been excluded and no feedback to suggest this.

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?
The policy should not create any barriers as all staff and students of the University have 24 hour free access to networked PCs on which they can access this new software.
Communication regarding the rollout of the software will be done in a variety of ways and channels and all communication will be available in alternative formats upon request.

Update 2015 – there is no evidence to suggest that the policy has created any barriers for any groups and no feedback to indicate this.

12. How are relevant equality groups or communities involved in the development, review and/or monitoring of the policy or practice?
The Technology Information and Communication Subgroup which is a subcommittee of the Student Disability Committee have reviewed and approved this change and the software has been tested for accessibility by Viki Galt, the Disability Information Officer for Information Services. All feedback from users will be gathered and analysed to note any potential unexpected positive or negative impacts that need to be addressed.

Update 2015: The Technology Information and Communication Subgroup and the Information Services Disability Information Officer continue to monitor this service and feedback and act on it 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.
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.

State the reasons for this conclusion and the evidence used, if not already included in section G.

See the information provided in section G – we believe this change will have a positive impact on disabled users and foresee no potential discrimination, harassment or victimisation.

Update 2015 – Option 1 for the reasons stated above.

I Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.
. Staff will be alerted to the need to monitor any feedback to ensure any potential impact (positive or negative) is noted and acted on as appropriate and the need for all communication about the roll out to be provided in alternative formats upon request. A range of communication methods will be used to alert users to the new software.

Update 2015: We will ask the Student Disability Service to promote Windows Eyes through their IT advisor in order to help increase usage statistics. The low uptake is to be expected given the specific nature of the software and the main use is by those with severe visual impairments. However, given that Windows now supply Windows Eyes for free there is the possibility that the number of users wishing to use this software might increase. Also according to the WebAim screen reader survey which although largely America based there has been a significant increase in Windows Eyes users.

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.

Update 2015: we will continue to monitor feedback and usage statistics and act accordingly.

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

In November 2015

Update 2015: When there is next a change in the policy or when we receive any positive or negative feedback related 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

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)): Viki Galt, Disability Information Officer for Information Services

Accepted by (name): Jessie Paterson, Convenor of the Technology and Information Sub Group of the Student Disability Committee

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

Date: 10.11.14

Update 2015 – undertaken and signed off by the above.

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