

THE UNIVERSITY of EDINBURGH

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

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.

Equality impact assessment for the Edinburgh Law School's website design

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

The University of Edinburgh's Law School is introducing a new design for its public facing website at <u>www.law.ed.ac.uk</u>.

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 law.ed.ac.uk domain in April 2018: Unique users: 29,780 Unique page views: 108,000

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

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

C. Person responsible for the policy area or practice:

Name: Toby Beveridge

Job title: Student Recruitment Manager

School/service/unit: Edinburgh Law School

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 YES
- 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 partnership¹

Equality and Diversity is very much embedded in the University's working practices. The University's Equality and Diversity strategy can be viewed at <u>http://www.ed.ac.uk/equality-diversity/about/strategy-action-plan</u>.

The new design will have the potential to impact on all 9 protected characteristics as it will be publicly available around the world, however we believe the greatest potential impact will be on disability and race.

The equality groups for which the policy/practice is particularly relevant are disability and race. This is because the new design will require to meet accessibility standards for disabled users access including compatibility with assistive technology such as voice recognition software, screen readers, screen magnification software etc. We will ensure as far as possible that the new content management system promotes and facilitates compliance with the Web Content Accessibility Guidelines version 2.1 AA standard (<u>http://www.w3.org/TR/WCAG20/</u>) as per our requirements under the The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018

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. In addition, browser settings will enable users to translate the pages into the language of their choice.

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 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 will adhere to the University's web accessibility policy which will have a positive impact on the website and will help to ensure that the new design will be, and continue to be, as 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 publicly available from http://www.ed.ac.uk/about/website/accessibility.

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 believe that the impact will be positive as the invitation to tender requires design agencies to agree to adhere to the following principles:

- The website shall provide appropriate channels of communication for feedback about accessibility.
- The website shall meet the University of Edinburgh's responsibilities under the Equality Act (2010) and The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012.
- The website shall meet level AA of the Web Content Accessibility Guidelines version 2.1 as standard.

The new design, in combination with the website accessibility policy, should ensure that all content that is publicly available will be made as accessible as possible. Website accessibility testing will be carried out before the website is made live. Current content that might not fully meet the guidelines in the new policy will be upgraded as part of a regular viewing and updating of webpages. If content does not meet the guidelines when the website goes live we will ensure that materials are available in alternative formats. The University of Edinburgh also has a license for SensuAccess which enables users to upload electronic documents and convert them to more accessible formats free of charge: https://www.ed.ac.uk/information-services/about/news/sensusaccess-assistive-technology

Edinburgh Law School employs a Web Development Officer who is responsible for the back end of the system. There will also be support from the College of Arts, Humanities and Social Sciences (CAHSS) Digital Innovation Team.

There will be a small dedicated team who will be responsible for managing, publishing and reviewing content on the website, ensuring that content meets web accessibility guidelines. These members of staff are the Marketing and Communications Manager, Student Recruitment Manager and the Research Communications and Impact Manager. There will be additional content editors who must complete the relevant training such as the University's online Writing for the Web course. Copy will submitted by any colleague to a designated editor, who'll then use the CMS to submit the copy to the website, using their specialised knowledge.

Given the small number of colleagues involved, should any individual require the editing facility to function beyond Drupal 8's baseline, it will be possible to make any additional adjustments on a case-by-case basis. These could either be in terms of customisations of the technology, or adjustments to process. Additionally, each editor will be supported individually and directly, and internal training on the use of the CMS, on our "house style", and on editing processes will be given on a one-to-one basis.

Every effort will be made to make sure the website meets the University's Web Accessibility Policy: by monitoring feedback and developing solutions locally or at College level; reporting issues to the Drupal community and applying official patches as they are released; and working with the central University Web Programme's (UWP) Drupal 8 project to identify potential problems and deliver practical solutions.

The following webpages detail the aforementioned standards: https://www.w3.org/TR/WCAG21/

Web Content Accessibility Guidelines (WCAG) 2.1 www.w3.org

Web Content Accessibility Guidelines (WCAG) 2.1 covers a wide range of recommendations for making Web content more accessible. Following these guidelines will make content more accessible to a wider range of people with disabilities, including accommodations for

blindness and low vision, deafness and hearing loss, limited movement and speech.

We are aware that we are legally responsible for accessibility of the CMS that we will be using but we would like to add that Drupal are also committed to accessibility. According to the Drupal Accessibility webpage:

"As an inclusive community, we are committed to making sure that Drupal is an accessible tool for building websites that can also be accessed by people with disabilities."

More information can be found at:

Accessibility | Drupal.org: https://www.drupal.org/about/features/accessibility

As an inclusive community, we are committed to making sure that Drupal is an accessible tool for building websites that can also be accessed by people with disabilities. Local processes can be investigated to provide local accessibility solutions if the above commitments do not address specific requirements.

Guidance documentation can be provided to support web content workflows.

Add notes against the following applicable statements:

• On any available information about the needs of relevant equality groups: Edinburgh Law School is changing its current CMS from Squiz Matrix to Drupal 8. We are therefore taking this opportunity to refresh the design of our website. There have been no complaints from staff about the current CMS. Drupal 8 has a number of accessible features such as inline error messages for the editorial interface of the CMS. We therefore expect that whilst we have not received any complaints about the current CMS, the move to Drupal 8 will improve accessibility. The University of Edinburgh's central website is moving to the Drupal 8 CMS and we will work closely with the central web team to ensure best practice is followed to ensure that the Web Content Accessibility Guidelines version 2.1 AA are met. Finally, there have been no complaints or issues raised related to any of the other protected characteristics.

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

The Information Services Disability Information Officer has completed an accessibility evaluation of the website based on the Web Content Accessibility Guidelines version 2.1 AA as a standard, including accessibility with assistive technology.

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

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

 If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups:
 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. Reasonable adjustments will be put in place and made for any users unable to access the website and for whom we are unable to make it accessible, for instance the provision of the information in an alternative format. As stated above full training will be given to all staff with editorial responsibilities and any adjustments required will be made on a case-by-case basis either by changes to the technology or to processes.

If the policy/practice contributes to advancing equality of opportunity² 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 and especially disabled users and users of assistive software. This should then make it easier for disabled users to use the site.

If there is an opportunity in applying this policy/practice to foster good relations: We will continue to promote accessibility as part of our training and support for all staff who will be editing these pages. This will help demonstrate further the University of Edinburgh's commitment to Equality and Diversity and in this case the needs of disabled users, including making websites as accessible as possible and mainstreaming as many adjustments as we can.

If the policy/practice create any barriers for any other groups? The policy should not create any barriers. 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 in the UK. There is no charge for accessing any of the information on the website.

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

Communication regarding the rollout of the design will be done in a variety of ways and feedback will be gathered along the way. In addition to face-to- face training, training and supporting documents will also be made available to. Information about the change will be made available in alternative formats free of charge on request. Reasonable adjustments will be made for disabled staff as required around the face-to-face training – such as offering a variety of dates and times, providing assistive technology such as induction loops as needed etc.

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

All feedback from users will be gathered and analysed to note any potential unexpected positive or negative impacts that need to be addressed. The IS Disability Information Officer will be asked to test any changes to the design of the website to ensure they are accessible.

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: Nothing other than that stated 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

- **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).

Monitor and respond to all website visitor feedback.

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

| 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. |
| Ensure staff are aware of the need to make reasonable adjustments where required and to provide content in alternative formats free of charge for disabled users on request. |
| 2. When will the policy/practice next be reviewed? When there are any significant changes to the website design or if we receive any positive or negative feedback related to any of the nine protected characteristics. Any substantive changes or additions to the website, or its governing policies, will be decided on and monitored by an editorial committee (comprising a mix of professional services and academic colleagues) on a variety of indicators and vectors, including equality. |
| H. Publication of EqIA |
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| 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)): Toby Beveridge, Student Recruitment Manager |
| Assented by (name): Julia Dawson |
| Accepted by (name): Julia Dawson (This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.] |
| Date: 03.05.19 |

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