Policy and Guidance:

Equality Impact Assessment

Understanding diversity and maximising positive impact though equality analysis

DATE: January 2022
Review due: January 2025

Contents

1. About this policy and guidance....3
2. Roles and responsibilities....3
3. Completing an Equality Impact Assessment....4
4. Monitoring and Review....5

1. About this policy and guidance

1.1 Equality, diversity and inclusion (EDI) is central to the values, vision and mission of De Montfort University (DMU), and is a key cross cutting theme in the university's strategy.

1.2 The Equality Impact Assessment process set out in this policy enables EDI to be considered through DMU's strategic, policy, process and practice developments.

1.3 Through the EIA process, greater opportunities and more successful outcomes are created for staff and students, the community and the university. Further, it ensures that DMU meets its legal responsibilities, particularly the Public Sector Equality Duty as outlined in the Equality Act 2010. As the analysis is intended to enhance the overall outcome of any work area or function, equality analysis at DMU is referred to as Equality Impact Assessment (EIA).

1.4 An EIA should form an integral aspect of the evaluation or development of any strategic plans, new or revised policies, corporate projects, corporate action plans and environment changes, such as estates changes. In other circumstances not identified in 3.1 below, a dynamic EIA may be acceptable, as long as all associated impacts have been considered and mitigated.

1.5 Any policy or initiative presented to University Leadership Board, or its sub-committees, must be accompanied by a fully considered or initial draft EIA. It is the responsibility of the policy holder, or lead officer for any change or initiative, that is responsible for undertaking an EIA.

2. Roles and responsibilities

2.1 The person(s) responsible for the practical delivery of the area under consideration (the 'owner') should conduct the EIA. This will facilitate nuanced consideration of the work, policy or strategy being assessed.

2.2 The owner should maintain a log of draft and final EIAs and regularly review both the EIA and associated action plans completed for their piece of work, providing an audit trail and ongoing assessment for EDI impact. Updated copies of the EIA should be sent to equality@dmu.ac.uk.

2.3 The Equality, Diversity and Inclusion Team will provide support and guidance to owners to assist them fully complete an EIA.

2.4 In line with the following section 'Completing an Equality Impact Assessment', Committee Chairs and senior officers of the university should ensure that a full EIA is completed when required and signed off by the EDI team.

2.5 Completed EIAs should be emailed to equality@dmu.ac.uk This will enable the university to maintain a central audit trail.

3. Completing an Equality Impact Assessment

3.1 An EIA should be carried out prior to the development or revision of a:

- Strategy
- Corporate project
- Corporate action plan (including action plans for TEF and REF)
- Policy
- Estates developments of a value higher than £25k.

3.2 If an EIA exists for documents under revision, for example, a policy under revision, it is acceptable to simply update the previous documentation.

3.3 If you are submitting a paper to committees for initial approval and you have limited details, an EIA does not need to be completed until approval to develop the piece of work is granted. However, it is advised that you begin to complete the EIA as soon as practicable as this will enable full consideration of equality, diversity and inclusion from the onset, leading to a more efficient process and one which is more appropriate for our diverse staff and student base.

3.4 Evidence should be used to identify if there could be a significant difference to how different groups of people will engage with any area of work, and should be used to inform the EIA.

3.5 Proportionality should however be considered. For example, it may not be necessary to conduct an EIA on certain elements of work being delivered to deliver a strategy, where an EIA has been conducted on the overall strategy. The number of people that will be affected, and the intended impact of the work should be considered when considering whether to conduct an EIA. The EDI Team can provide guidance as required.

3.6 It is not necessary for an EIA to be completed where the area of work under consideration will not have an impact on staff, students or other stakeholders. However, this is likely to apply to very few scenarios, and may only be determinable through considering the areas of analysis set out in the below EIA form.

3.7 In other circumstances not identified in 3.1 of low scale and risk situations, a dynamic EIA may be acceptable, as long as all associated impacts have been considered and mitigated.

3.8 Completion of the form will provide an audit trail of how DMU has met its legal obligations. Where it is considered that no EIA is required following conversation with the EDI team, the evidence-based written rationale should be recorded and logged alongside documentation associated with the piece of work. The EDI team will additionally keep a copy of this documentation.

3.9 All relevant documents should be sent to EDI at the start of the process, in line

with the process in Appendix A.

3.10 Estates should use the Estates form provided, which has been agreed for projects over £25K as a matter of course (or contact with the EDI team is made for confirmation as to whether one needs to be undertaken), and for projects below if an EDI impact is anticipated.

3.11 The guidance provides information on utilising an evidence based approach, and assists the consideration of the diverse needs of different groups, which should be reflected upon in relation to each question set out in the form.

3.12 The prompts in the guidance are not definitive or the only responses to the questions posed in the form. They are intended as a guide to developing understanding of difference and impact and provide examples of things that may be revealed. Other questions and areas for investigation will emerge as evidence and assessment is conducted.

3.13 Blank forms can be found on: https://demontfortuniversity.sharepoint.com/sites/DMUHome/org/EGLS/equality/Pages/EIAs.aspx where FAQs, guidance and good practice can also be found. They can also be found at Appendix B and C below.

3.14 Following the process outlined in Appendix A, the finalised version of the form should be sent to: equality@dmu.ac.uk. These will be made available on the intranet as part of an institution wide bank of good practice, unless you have indicated by ticking the box on the form that this cannot be shared, in which instance, they will be stored in a confidential folder and only accessed for quality review purposes by the EDI team,

4. Monitoring and Review

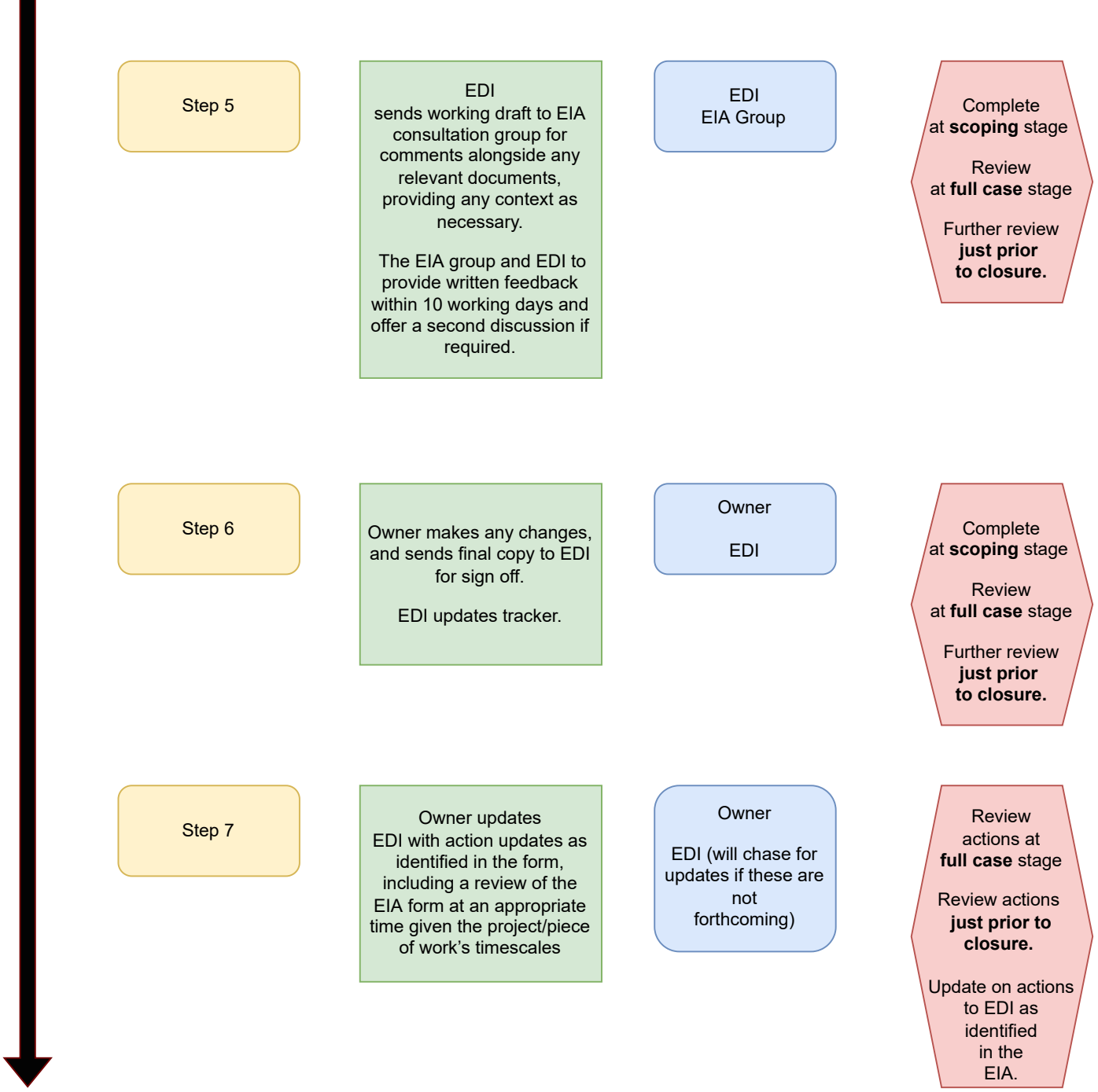
4.1 This policy and associated templates should be reviewed every three years.

4.2 The policy should be reviewed if there is a change in legislation or internal document policy change.

Equality Impact Assessment Process Chart

A note on terminology:
Scoping: when you are initially considering the piece of work and the full extent of the details have not yet been determined.
Full case: when the full details have been determined, and there is a clear outline and structure for the piece of work.
Closure: when the piece of work has closed.

Step in process	Action/Process	Person/Team responsible	When to complete
Step 1	Owner notifies EDI of the piece of work and requirement to complete the EIA to equality@dmu.ac.uk. In this e-mail, the owner sends through as much information on the piece of work, including supporting documents. EDI logs on tracker.	Owner EDI	Complete at **scoping** stage
Step 2	EDI reads documentation (please allow 5 working days) and arranges to have a discussion with the owner to consider primary impacts and to assist identify data requirements and consultation needs.	EDI	Complete at **scoping** stage
Step 3	Owner analyses data (this may be self serve through the dashboards, or provided by HR and SPS). Policy owner consults with relevant groups	Owner HR SPS Staff network groups	Complete at **scoping** stage Review at **full case** stage Further review **just prior to closure.**
Step 4	Owner writes draft EIA, then sends to EDI	Owner	Complete at **scoping** stage Review at **full case** stage Further review **just prior to closure.**


Step 5
EDI
sends working draft to EIA consultation group for comments alongside any relevant documents, providing any context as necessary.
The EIA group and EDI to provide written feedback within 10 working days and offer a second discussion if required.
EDI
EIA Group
Complete at **scoping** stage
Review at **full case** stage
Further review **just prior to closure.**
Step 6
Owner makes any changes, and sends final copy to EDI for sign off.
EDI updates tracker.
Owner
EDI
Complete at **scoping** stage
Review at **full case** stage
Further review **just prior to closure.**
Step 7
Owner updates EDI with action updates as identified in the form, including a review of the EIA form at an appropriate time given the project/piece of work's timescales
Owner
EDI (will chase for updates if these are not forthcoming)
Review actions at **full case** stage
Review actions **just prior to closure.**
Update on actions to EDI as identified in the EIA.

APPENDIX B:

Equality Impact Assessment Form

Equality impact assessment completed by:	
Name:	
Role:	
Faculty/Directorate:	

Name of the piece of work: PLEASE ENTER HERE.

Brief description of the aims of the work, including whether it impacts on staff, students and/or other stakeholders.

Have you consulted with a diverse range of stakeholders, including staff network members or student societies where appropriate, and/or utilised data to determine how to undertake your work, and to explore the benefits and/or concerns for different EDI groups? **Some impacts on EDI groups may be obvious, however, others may not be. Accordingly, we recommend you consult with diverse groups where appropriate to determine this.**
Please outline the role of the people you consulted and why you consulted them, any outline any data you have considered. You may also use this space to expand upon any benefits, concerns or actions noted in the table below if you wish.

The EIA policy gives examples of considerations for different protected characteristics. For example, in your assessment, consider:

- Does the work reflect the diversity of staff and students at DMU?
- Does the work challenge stereotypes where possible?
- How will you ensure the engagement of all groups, for example, is the wording easy to understand and what formats will it be available in?
- How will the activity be marketed?
- How will the piece of work improve the experience and outcomes of different groups of staff and students at DMU?
- Are you taking a flexible approach, where possible?
- Are gender neutral pronouns being used?

Do you believe the piece of work could have possible **negative** impacts on any of the below groups? **Consider whether the work presents any barriers, problems or excludes any of the groups below (either directly or indirectly)**			
Characteristic	**Yes**	**No**	**If yes, please outline why and any evidence used to determine this.**
Age			
Disability			
Race (including ethnicity and nationality)			
Religion or belief			
Sex			
Sexual orientation			
Gender reassignment			
Pregnancy and maternity			
Marriage and civil partnership			

Do you believe the piece of work could have possible **positive** impacts on any of the below groups?			
Characteristic	**Yes**	**No**	**If yes, please outline why and any evidence used to determine this.**
Age			
Disability			
Race (including ethnicity and nationality)			
Religion or belief			
Sex			
Sexual orientation			
Gender reassignment			
Pregnancy and maternity			
Marriage and civil partnership			

Action Planning

For every EIA, we expect a timely review of the new process/policy/strategy for EDI impact, to ensure we are meeting the needs of our service users, and to ensure we are meeting our legal obligations under the Equality Act 2010. This may be, for example, 3, 6 or 12 months after implementation, depending on the scope and length of your work.

Please outline below how you will review your work for EDI impact, and also include how you will take action to resolve or, keep under scrutiny, any concerns raised in the form above, if you have not yet been able to take action to address these.

Action	Intended improvement / outcome	Person responsible	Timeframe	Any link to DMU strategy?
For example: Consult with diverse staff members on whether the policy meets their needs.	*To ensure that the policy meets the needs of staff and students at DMU, to ensure we are providing an equitable experience, and improving the outcomes of our staff and students*	*Policy owner*	*Informal consultation 3 months after policy launch, formal consultation with staff networks 6 months after launch*	*EDI Strategy*
For example: Gather numerical data to ensure equitable engagement with the policy	*To ensure that the policy meets the needs of staff and students at DMU, to ensure we are providing an equitable experience, and improving the outcomes of our staff and students*	*Policy owner*	*Consider data and any gaps or actions required at 6 and 12 months*	*EDI Strategy*

All EIAs will be anonymised as far as possible and used to share good practice. Please tick here if you **do not** consent to your EIA being shared: ☐

Please submit completed EIAs to equality@dmu.ac.uk.

APPENDIX C:

Estates Equality Impact Assessment Form

1) Person responsible for project:

Name of person completing the EIA	
Job role of the above	
Project Lead (if different from above)	
Job role of the above	
Department/Faculty	Estates & Facilities
Date form completed:	

2) What is the purpose of the project?

New building acquisition	☐
New building development	☐
Routine refurbishment	☐
Non-routing refurbishment	☐
Reasonable adjustment	☐
Other (please state)	☐

3) Please attach building/development plans where available.

4) How do you think the project will benefit different groups of campus users (staff, students and visitors where appropriate) and how could these have an impact on campus user with different protected characteristics and accessibility requirements?

Are there any particular considerations which must be taken into account for the brief (e.g. teaching space configuration etc) which could have an impact?

5) Some impacts on EDI groups may be obvious, however, others may not be. Accordingly, we recommend you consult with diverse groups where appropriate to determine this.

Have you consulted with a diverse group of stakeholders, including staff network members and/or chairs, relevant DSU society members or officers and/or utilised data?

Please outline the role of the people you consulted and why you consulted them, any outline any data you have considered. You may also use this space to expand upon any benefits, concerns or actions noted in the table below if you wish.

6) Please outline if, in line with question 5, there are any concerns or benefits for the following groups, e.g. provision of quiet room, breastfeeding facilities, prayer facilities:

Characteristic	**Benefits**	**Concerns**	**Action taken to address concerns**
Age			
Disability			
Race (including ethnicity and nationalist)			
Religion or belief			
Sex			
Sexual orientation			
Gender reassignment			
Pregnancy and maternity			
Marriage and civil partnership			
Impacts on all underrepresented groups			
Impacts on groups which are not protected by themselves but may have an impact on widening participation (e.g. lower socioeconomic class)			

7) Can you confirm if:

Item	Yes	No	N/A
Building regulations (Document M) has been adhered to, as far as possible	☐	☐	☐
Appliance sockets are at a reasonable height			
Lighting is dimmable throughout	☐	☐	☐
Disabled parking is available	☐	☐	☐
Tactile pavement is present	☐	☐	☐
Any ramps conform to building regulation gradients	☐	☐	☐
Doors have touch pads	☐	☐	☐
Carpets or flooring is wheelchair accessible	☐	☐	☐
Space and turning circle regulations have been factored into the plans	☐	☐	☐
Access is step free, or equivalent step free alternatives are being made available	☐	☐	☐
Sufficient height adjustable furniture is being provided	☐	☐	☐
Chairs are suitable for those with mobility needs	☐	☐	☐
Work surfaces and equipment are at accessible heights	☐	☐	☐
Colour pallets are suitable for colourblind, visual impairments, and sensory needs	☐	☐	☐
Pillar colours are contrasting	☐	☐	☐
Whether there are lifts present	☐	☐	☐
Are facilities unisex?	☐	☐	☐
Quiet spaces are available	☐	☐	☐
Hearing loops and signage are installed	☐	☐	☐
The space has sufficiently controllable heating/cooling	☐	☐	☐
The space has sufficient interior and exterior (where applicable) lighting	☐	☐	☐
‘Changing places’ facilities are available	☐	☐	☐
Gender neutral toilets are available	☐	☐	☐

8) If you ticked ‘no’ to any of the above, please outline these here, and how you will take steps to mitigate against these. Additionally, if any of the Building Regulation (Document M) requirements were not possible to undertake, but they come under the 10 year exemption, please list these here:

Issue identified	Mitigating action

9) Action Plan:

Action	Intended improvement / outcome	Person responsible	Timeframe	Link to DMU Strategy
Consult with diverse facility users on whether the development meets their needs.			Consider a timeframe which would work – e.g. 6 months after installation, 12 months after etc, depending upon the works being done.	

Please return completed forms to equality@dmu.ac.uk