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Conducting Equality Analysis

This document has been developed by the University Equality & Diversity Unit and provides guidance and tools to support the effective conduct of equality analysis using Equality Impact Assessments (EIAs). By following these guidelines, you can ensure that your policies, procedures, projects, decisions, events, and initiatives ([‘practice’](#) hereafter) are fair, inclusive, and promote equality for all individuals.

The tools included will help you identify potential impacts on various groups, engage stakeholders, and develop plans to mitigate any negative effects while enhancing positive outcomes. This proactive approach is crucial in creating an environment where everyone has equal opportunities to succeed and feel valued.

Records of equality impact analysis and relevant data should be retained by departments or Divisions. Documentation may be required to be disclosed in the event of a legal or other challenge or under Freedom of Information legislation. Records of equality impact analysis include the Equality Impact Screening Tool and/or the Equality Impact Assessment'

1. Public Sector Equality Duty - definition

The Public Sector Equality Duty (PSED) requires the University, when carrying out its functions, to have [due regard](#) to the need to eliminate [unlawful discrimination](#) (which includes harassment, victimisation and any other conduct prohibited by the Equality Act 2010), [advance equality of opportunity](#) between persons who share a protected characteristic and persons who do not share it, and [foster good relations](#) between persons who share a protected characteristic and persons who do not share it.

The duty applies to any activity of the University. It embraces the full range of policies, guidelines, services/functions, projects, processes, events – essentially everything! The duty applies to any activity where equality and good relations may be relevant, though the level of scrutiny will vary according to their significance. Equality analysis supports the University to integrate equality into the development and implementation of new and existing practices.

As well as assessing possible impact on groups who share one of the protected characteristics under the Equality Act 2010 (listed in [Section 3](#) below), it is recommended that equality analysis also considers the impact on groups with parenting / caring responsibilities, staff who work part-time, and groups from particular [socio-economic backgrounds](#), where possible, given the potential for these factors to impact on staff and students' opportunities, experiences and outcomes.

2. What is Equality analysis?

Equality analysis considers how different groups are directly or indirectly affected by proposed practices, or changes to practices, and makes improvements to promote equality and inclusivity.

Equality analysis helps to ensure that:

- the potential effects of a practice (or proposed practice) are understood, by assessing the impacts on different groups both external and internal
- any adverse impacts are identified and actions proposed to remove or mitigate them
- decisions are transparent and based on evidence with clear reasoning

Specifically, equality analysis will help to identify where a practice could:

- a) have a direct or indirect **negative** impact on equality by creating or contributing to a risk of discrimination, harassment, victimisation or other conduct prohibited by the Equality Act 2010, or
- b) have a direct or indirect **positive** impact on equality by:
 - a. **Eliminating unlawful discrimination, harassment or victimisation;**
 - b. **Advancing equality of opportunity** by:
 - i. removing or minimising disadvantages experienced by people who share a protected characteristic that are connected to that characteristic (eg, considering the accessibility requirements to participate in an activity/event for disabled people);
 - ii. taking steps to meet the needs of people who share a protected characteristic where they are different from the needs of people who do not share it (eg, re-orientation support on return from long term family leave);
 - iii. encouraging people who share a protected characteristic to participate in public life or other activities where their participation is low (eg, targeting additional recruitment advertising in areas likely to attract applicants from under-represented groups); or
 - c. **Fostering good relations** between people who share a protected characteristic and those who do not by:
 - i. Tackling prejudice and
 - ii. Promoting understanding between different groups

3. What is meant by discrimination?

Generally, discrimination means treating someone 'less favourably' than someone else because of a protected characteristic. There are nine protected characteristics: **age, disability, gender reassignment, marriage and civil partnership** (in respect of employment only), **pregnancy and maternity, race** (including colour, nationality and ethnic or national origins), **religion or belief, sex, and sexual orientation**. The second and third PSED aims of advancing equality of opportunity and fostering good relations apply to all of

those protected characteristics except for marriage and civil partnership. However, the University must still have regard to the need to eliminate unlawful discrimination **in employment** due to marriage and civil partnership as part of the first PSED aim of eliminating discrimination.

Discrimination is usually unlawful, but is allowed in certain limited situations. There are different types of discrimination under the Equality Act 2010. A broad description of the following main types of discrimination is set out within the [glossary](#) (with links to ACAS guidance on the particular type of discrimination, where applicable):

- Direct discrimination
- Indirect discrimination
- Harassment
- Victimisation
- Discrimination arising from a disability
- Failure to make reasonable adjustments
- Pregnancy and maternity discrimination.

Further information on the University's Equality policies can be found on the [EDU website](#).

4. When should equality analysis be conducted?

Equality analysis should be an **integral part of everything we do that has relevance to the equality impact on people with different protected characteristics**. It should happen during throughout the development of a practice, and in advance of decisions being made, *in order to inform* decision-making. It should not be retrospective or undertaken near the end of a process.

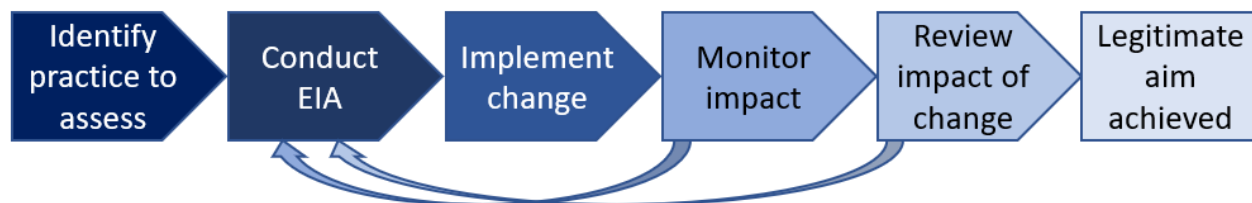
If you are not sure whether a proposed new practice, or changes to an existing practice, may have relevance to equality (and so whether an equality analysis is required) it is recommended that you complete the [Equality Impact Assessment Screening tool](#) to assess whether an Equality Impact Assessment is required.

Equality analysis should be carried out at several key stages of a practice to ensure that any potential impacts on equality are identified and addressed early and throughout the decision-making process.

- At the planning stage of new practices
- Before making changes to existing practices
- During the implementation of a practice to monitor its impact
- Whenever issues related to equality are identified
- Regularly, to review and ensure ongoing practices remain fair and inclusive

The equality analysis process typically follows the stages in the diagram below. Monitoring and reviewing must be ensured once a change in practice is implemented. This provides a feedback loop into the equality analysis process ensuring that the intended (and

unintended) impacts are identified and addressed until the aim of the practice is achieved, much like a cycle of continuous improvement.



5. Assessing activities for their potential impact on equality

If there is likely to be an equality impact on different groups of people, you will need to consider the level of equality risk and appropriate depth of analysis which needs to be undertaken to assess the equality risk. This will vary depending on the individual circumstances of the case; however, the following table is a broad indicator of level of risk and analysis that is likely to be required.

Equality risk	Level of analysis required	Practices including (not limited to)
Very high	Requires extensive analysis due to the highest likelihood of impact on equality	Strategic planning, allocation of significant financial or other resources, major organisational changes, construction or renovation projects, changes to conduct and disciplinary policies, health and safety, People-related strategies, EDI strategies or initiatives targeting under-representation
High to Very high	Requires a thorough analysis to ensure impact on equality is fully assessed	Admissions policies, staff recruitment, development and promotion policies, major curriculum changes
Moderate to High	Requires a balanced level of analysis, reflecting a moderate-high impact.	Minor curriculum changes, new or changed staff or student services, policy updates or revisions
Low to Moderate	Requires a level of analysis sufficient to demonstrate that equality analysis has been carried out	Routine communications, facilities maintenance, procurement processes, administrative tasks, events planning.
None	PSED does not apply, equality analysis is not required	Activities which do not have the potential for bias or discrimination to affect the development or implementation of practices

The time and effort involved in equality analysis should be in proportion to the relevance and significance of the policy and the level of equality risk as per the table above.

Practices which involve substantial changes to policies, structures, and the core activities of the institution generally carry the highest likelihood of impact on equality and therefore

require the highest level of analysis and consideration to ensure they do not adversely affect any group.

6. Who is responsible for conducting an EIA?

The member of staff who holds responsibility for the practice is ultimately responsible for ensuring that an EIA is undertaken. However, this may be by someone other than the lead, for example, a person(s) with the best knowledge of the area of work being assessed. The following people may also be engaged, taking a proportionate approach to the practice in hand:

- Equality and diversity specialists who understand how different groups might be affected.
- Stakeholders, including representatives from groups who may be impacted.
- External experts if additional expertise is needed.

Engaging a diverse team in the EIA process ensures that all perspectives are considered and that the EIA is thorough and effective in promoting equality and inclusivity.

7. Key considerations when conducting an EIA

Evidence - A fundamental part of an EIA is evidence and involvement from protected groups (ie those groups who share a protected characteristic, have parenting/caring responsibilities, work part-time, and/or come from particular socio-economic backgrounds). This might include data, complaints, surveys, feedback forms, internal and external research. Use the data to frame the case and support analysis, consider whether you have enough data and ask for something more specific from the relevant team if necessary. Contact your departmental or divisional point of contact (HR or EDI team) for more information and support on identifying relevant data. Information on sources of equality data and advice can also be found here: [Equality analysis | Equality and Diversity Unit \(ox.ac.uk\)](#). Further guidance on evidence can be found under question 3 of the EIA template.

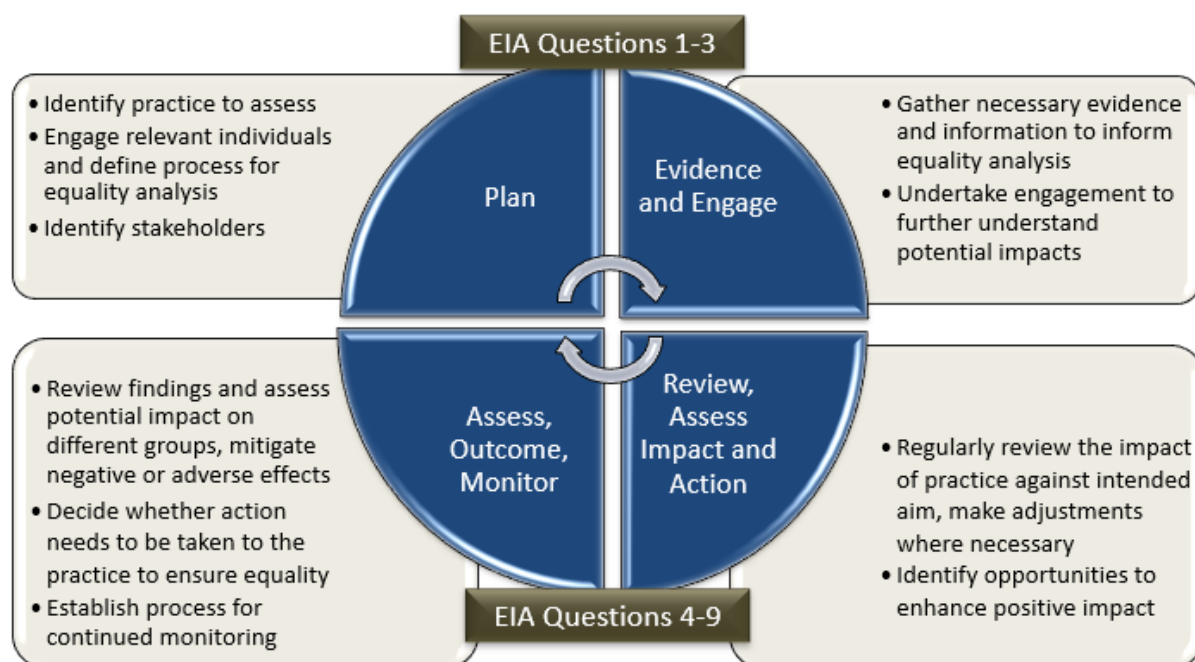
Level of expertise required - You are not required to be an equality expert; however, you are expected to consider how different activity might affect different groups, and you may need help collecting evidence or consulting people with different protected characteristics. If you want to undertake consultation please do so, or speak to your local HR/EDI team for any other support.

Training – If you are undertaking an EIA, it is highly recommended that you are familiar with the equality, diversity and inclusion-related training offered by the University, which can be accessed [here](#).

Equality Impact Assessment Template - Guidance

The following guidance supports you to conduct an equality impact assessment, using the template, which can be found in [Annex C](#). It is recommended that you review the template and the guidance for each question, both before completing the EIA template and as you go through each question. The links provided on the template and the relevant guidance should help you to navigate between the two.

There are four components to the equality analysis process; (1) planning, (2) evidence and engagement, (3) assessing equality, determining the outcome of the analysis, monitoring (4) reviewing the impact of the practice and actioning where necessary, as shown in the diagram below. It is not essential to approach the analysis rigidly in the order of the questions; however, the key components of this process should be covered within your equality analysis to ensure that it has been completed thoroughly.



Question 1 – The overarching practice

Provide a brief statement to summarise the proposed new or revised practice.

[Click to go to EIA Template](#)

Question 2 – The aim of the practice

It is important to identify the aim(s) of the practice and intended outcome(s). This might include:

- Being clear about what the practice intends to achieve, ensuring that this is understandable to a broad audience.
- How the aim supports the university's broader goals, such as promoting equality of opportunity or reducing disparities between different groups

- How the aim will consider and positively impact individuals with protected characteristics, and
- How the aim reflects an intention to create an inclusive environment where all students, staff and stakeholders feel respected and supported.

If the practice is found to have a negative impact on [protected groups](#) which cannot be removed¹, it will be necessary to assess whether the practice can be justified. **The primary purpose of an Equality Impact Assessment is to eliminate discrimination.** If the practice can be demonstrated to be 'a proportionate means of achieving a legitimate aim' then it *may* not amount to unlawful discrimination.

There are two main elements to justification that you would need to consider when considering the impact of the practice (when completing Questions 6 and 7 of the EIA Template) where a negative impact is found and cannot be removed. These are:

- Whether the aim is **legitimate** – to be legitimate the aim must be a real, objective consideration, and not in itself discriminatory. In other words, the aim must be lawful (the goal should comply with existing laws and regulations) and necessary (there must be a real need or problem that the aim addresses).
- Whether the practice is a **proportionate** way of achieving the legitimate aim - this involves a balancing exercise considering whether the importance of the aim outweighs any discriminatory effects of the practice. To be proportionate, there must be no less discriminatory means of achieving the legitimate aim. Therefore, it will be important to be able to show that all alternative measures have been explored and would be ineffective, before reaching a conclusion that the practice can be justified.

¹ You should aim to remove negative impact wherever possible

Example (proportionate):

A university considers implementing a policy that all its building and property maintenance staff must hold a valid driving licence so they are able to drive the university maintenance vehicles.

It is identified that this would potentially negatively impact on employees with a physical disability or a long-term health condition (eg, being partially sighted or having epilepsy) which prevents them from holding a driving licence.

Before proceeding, the university needs to identify the legitimate aim of the requirement to hold a valid driving licence. For example, it may be to ensure that the tools and equipment needed for the various maintenance jobs can be transported to the different university sites to enable the maintenance work to be effectively carried out.

The university needs to consider whether there is a less discriminatory way of ensuring that the necessary tools and equipment are at the locations where they are needed and if there isn't, be able to demonstrate that there is not. In implementing the policy, it will need to recognise that, in the case of a disabled employee who is not permitted to hold a driving licence, they will need to make an adjustment to the policy where it would be reasonable to do so. Only then will the university be able to justify the policy as a proportionate means of achieving a legitimate aim.

Depending on the background and evidence, examples of a legitimate aim could include:

- Maintaining academic standards
- Protecting the health and welfare of staff and students
- Ensuring accessibility for staff or students with disabilities
- Supporting first-generation students to adapt to university life and academia
- Promoting gender or race equality in a particular field of study in which there is under-representation
- Provision of support or facilities for LGBTQ+ staff or students to ensure they have a safe and inclusive environment

[Click to go to EIA Template](#)

Question 3 – The brief background to the practice

When detailing the background of a practice in an Equality Impact Assessment (EIA), it is helpful to summarise how it originated. Highlight the issues or needs it is aiming to address, referencing any relevant context, research, policy decisions, or organisational goals.

Include relevant evidence (take a '[proportionate](#)' approach) from consultations and stakeholder engagements, such as surveys, focus groups, and public feedback. Summarise findings from any preliminary equality assessments or pilot studies to illustrate the practice's anticipated impact.

Identify any gaps in the existing data or feedback, and specify additional evidence needed to support the assessment. This might involve collecting more quantitative data or engaging with under-represented groups. Consultation enables:

1. Perspectives to be gathered from diverse groups, including those directly affected by a proposed practice
2. Identifying potential impacts that may not be evident through data alone
3. Ensuring inclusivity and understanding
4. Enhancing trust and legitimacy of the process

Data

The University collects, analyses, reports and publishes staff and student data related to protected characteristics to help us assess the impact of our policies and practices on equality and good relations (for example, the annual [EDI Report, Breaking Barriers: EDI in Academic Career Progression at the University of Oxford](#)). For further details of data sources, please see the [EDU website](#).

Staff with a genuine business need (typically within HR/EDI functions) have access to University diversity dashboards at a Divisional and departmental level². Contact your local team for further information.

Departments may also have published Athena SWAN applications, which will include extensive data showing the staffing and student profiles of their departments. EDI-related reports and data and staff survey data may all be helpful sources.

[Click to go to EIA Template](#)

Question 4 – Who is likely to be affected by the practice?

The Public Sector Equality Duty (PSED) general duty relates to various stakeholders and groups involved in or affected by the institution's activities. This includes staff, students, prospective staff and student applicants, visitors, guests, the local community with whom the University engages, external organisations, contractors, partners, research funding bodies.

[Click to go to EIA Template](#)

Question 5 & 6 – Assessing the impact on different groups

When evaluating how a practice could affect people with different protected characteristics or of different groups, it is important to consider each group and the specific ways they might be impacted. The Equality Act 2010 identifies nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership (employment only), pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex, and sexual orientation. However, as socio-economic background, parenting or caring responsibilities or working part-time can impact staff and students'

² Anticipated release of departmental dashboards by summer 2024

opportunities, experiences and outcomes, it is recommended that these groups are also considered in equality analysis.

Your analysis should seek to understand how the evidence shows whether or not there is an adverse impact. Ultimately you are looking to understand what will or might happen (or not happen) if the practice is implemented in its current iteration. The following questions will help you to consider this:

- Are there any particular groups who are over-represented within those who will be affected?
- Will any groups face increased difficulty as a result of this policy?
- Is access to services/benefits reduced/denied for any groups in comparison with others?
- Is there evidence of certain groups having lower success rates in particular processes?
- If the policy includes an eligibility criterion, could this disadvantage certain groups?
- Does this policy adequately address any existing equality issues that you are aware of?

A positive impact:

Consider whether the practice could eliminate discrimination, or have a positive impact on equality in any of the following ways by:

1. Eliminating discrimination, harassment or victimisation
2. Advancing equality of opportunity by
 - removing or minimising a disadvantage
 - meeting the needs of different groups
 - encouraging increased participation of particular groups where participation is low.
3. Fostering good relations by tackling prejudice or promoting understanding of others.

Examples of positive impact:

The following examples could have a positive impact on equality by eliminating discrimination and/or advancing equality of opportunity and/or fostering good relations.

- a) Initiatives that support flexible working hours could benefit parents and carers, promoting gender equality.
- b) Implementing a mentoring programme for younger and older staff could foster intergenerational learning and support, enabling knowledge transfer and professional development for both younger and older employees.
- c) Ensuring University facilities are fully accessible by removing physical barriers that could lead to the exclusion of disabled people could ensure their access to facilities and opportunities is the same as others.
- d) Introducing gender-neutral restrooms to provide safe facilities for transgender and non-binary individuals could promote an inclusive environment that respects gender identity.
- e) Implementing scholarships and support programs for underrepresented racial and ethnic groups could address systemic barriers that have historically marginalised certain groups.
- f) Offering flexible working/study arrangements for new parents could provide equal opportunities for new parents to continue their education or work and demonstrates the university's commitment to work-life balance.
- g) Implementing needs-based financial aid and affordable housing options for low-income students could address financial barriers that disproportionately affect low-income students.
- h) Providing health and counselling support services to support the specific health and wellbeing needs of LGBTQ+ individuals could ensure that they receive respectful and knowledgeable care.
- i) Implementing flexible work and study schedules to accommodate religious observances could ensure that individuals of all faiths have equal opportunities to participate in work and academic activities without being disadvantaged by their religious commitments.

A negative impact:

Consider whether a practice will have a negative impact on equality by creating or contributing to a risk of discrimination, harassment or victimisation. It is important to consider unintended consequences that could exacerbate existing inequalities.

Examples (negative impacts):

- a) Renovating buildings without considering accessibility requirements could exacerbate a **risk of discrimination** for disabled individuals.
- b) Hosting cultural events that primarily highlight the traditions and celebrations of majority racial or ethnic groups could **marginalise** minority racial or ethnic groups, leading to feelings of **exclusion**.
- c) Failure to recognise and use individuals' correct names and pronouns in official documents and communications could cause distress and **alienate** transgender and non-binary individuals, **impacting health** and their **sense of belonging**.
- d) Implementing a digital-only communications policy could negatively impact older employees who may not be regular users of IT, leading to feelings of **exclusion** or inability to access important information, **preventing them from participating fully** in university life.
- e) Offering scholarships that are only available to one gender would amount to unlawful direct discrimination on the basis of sex in respect of the sex excluded from applying for the scholarships **unless** the practice meets the legal requirements for lawful [positive action](#) (see [link](#)). Furthermore, it could potentially **disadvantage** those who do not fit the traditional gender binary.
- f) Implementing a uniform dress code which does not accommodate religious attire, could mean that individuals have to choose between their religious beliefs and university policy which could potentially lead to **religious discrimination**.

A mixed impact:

Some practices might have both positive and negative impacts on different groups.

Example (mixed impact):

A policy promoting remote work could positively impact staff with mobility issues but negatively affect those without a conducive home working environment.

For Question 6, ensure you provide a brief explanation for each impact, describing the nature of the likely impact and any evidence or reasoning behind your evaluation. This structured approach will help in identifying and mitigating any adverse effects while enhancing the positive outcomes of the practice.

[Click to go to EIA Template](#)

Question 7 – mitigations for negative impact(s)

Based on the analysis of your evidence, if you identify any negative impacts, you will need to act to mitigate this. Ask yourself:

- What is causing the negative impact?
- Are there any alternative measures or interventions that would achieve the intended aims of the practice without having a negative effect?
- Are there any additional measures which would further equality of opportunity in the context of this practice?

To address identified negative impacts, consider the following options:

1. When considering the impacts of proposed practices on groups of people, it could be necessary to adjust the practice to eliminate a negative impact, or to ensure a more targeted (and proportionate) approach to the issues to be addressed, leading to better outcomes.

Example (adjustments to practice):

The University considers mandating EDI training for all staff with the aim that it will promote equality of opportunity and foster good relations through improved understanding, inclusion and support for diverse groups. However, it recognises that mandating the training for everyone may be met with resistance, may not be wholly relevant to everyone, or may not effectively address all or specific diversity-related issues. Consequently, it may not meet the aims of PSED in relation to people with protected characteristics.

- Initially, the University may consider **piloting training** in an area which shows most or relevant need.
- Training is developed that is **specific to challenges** faced by students or staff (evidence-based), eg, unconscious bias in hiring or grading or supporting students' diverse needs.
- **Voluntary components** are available to staff who wish to enhance their learning
- The impact of the pilot and mandatory component is **evaluated** for impact to inform further implementation, and to ensure that it remains relevant and effective.

2. Implement support systems like training programs, communications or additional resources for affected groups.
3. Engage staff from different groups to refine mitigation strategies through dialogue and feedback.
4. Establish robust monitoring mechanisms to track effectiveness, regularly reviewing and adjusting measures based on feedback.

5. Clearly document and communicate mitigation strategies to relevant stakeholders, fostering transparency and accountability.

Example mitigations (of negative impacts on p12):

- a) Ensuring that all renovations include accessibility features and consultation with disability advocates during the planning process.
- b) Including diverse cultural events representing various racial and ethnic groups
- c) Implement policies that recognise and respect correct names and pronouns
- d) Offer training sessions for older employees and others on digital communication tools
- e) Create gender-inclusive scholarship opportunities
- f) Modify dress code policies to accommodate the needs of people of different religions, disabled people, people of different genders or another protected characteristic.

When negative impacts persist (or later become apparent through monitoring) despite mitigation efforts:

1. Clearly define aspects of the practice causing negative impacts and understand how they affect different groups.
2. Engage with stakeholders to gather further insights on minimising negative impacts.
3. Explore alternative approaches, assessing feasibility, benefits, and drawbacks.
4. Based on stakeholder input, review whether the practice could be redesigned, to further mitigate the negative impact and still gain the benefits of the legitimate aim(s).
5. Consider whether [Positive Action](#)³ is relevant and appropriate in this situation.
6. Carefully plan and implement changes, providing necessary support and resources for impacted groups.
7. Continuously monitor impact, collect feedback, and adjust the practice as needed.
8. Document decision-making, changes made, and rationale to maintain transparency and accountability.

There may be cases where a negative equality impact is justifiable, for example:

- to address the needs of a particular group through positive action
- for business delivery reasons
- for health and safety reasons
- for security reasons

³ Positive action is action that is taken to overcome or minimise disadvantages suffered by people who share a protected characteristic or to meet their different needs or to overcome disproportionately low participation rates by people who share a protected characteristic. It is not the same as positive discrimination (eg employing someone because they are a woman) which is illegal in the UK. If you are considering positive action please check the guidance on the EDU website ([link](#)) and seek advice from EDU (equality@admin.ox.ac.uk).

If you believe that a negative impact on a particular group may be justified, please liaise with your EDI lead, or the EDU. It must be explicit why this is the case.

Once you have mitigated any negative impacts, and maximised opportunities to advance equality, you should be in a position to make an informed judgement about what should be done with your policy. This decision should be made within the relevant governance processes.

- No major change to practice – analysis demonstrates that the practice is robust, remember to document the reasons for this and how this decision was made.
- Adjust the practice – remove barriers or to put in place actions identified as part of the analysis exercise.
- Implement the practice with actions to address negative impacts
- Do not continue with the practice

[Click to go to EIA Template](#)

Question 8 – Monitoring and review

Monitoring the implementation of a new or revised practice is essential to ensure that it is having the desired effect and is not unintentionally harming any protected groups. Effective monitoring can be achieved by following the steps below, maintaining a proportionate approach:

1. **Ensure the objectives of the practice are measurable** and aligned with the findings of the EIA (if the EIA indicates that a particular group will suffer a negative impact, align the actions that will be taken to mitigate these with the overall objectives).
2. **Identify key indicators** that will help measure the practice's impact on different protected groups. These indicators should cover both quantitative and qualitative data, eg, participation rates, service uptake, data from staff or student satisfaction surveys or focus group feedback from affected groups.
3. **Maintain ongoing engagement** with stakeholders, including those from protected groups, to gather continuous feedback. This can be achieved through focus groups, network meetings, or advisory panels.
4. **Set appropriate milestones and timeframes** for data and feedback analysis to identify trends, issues, and areas for improvement. Look for disparities or unintended negative impacts on any protected groups.
5. **Prepare summary reports** on the monitoring findings as appropriate and proportionate to the practice (eg, via relevant departmental or University committees). These reports should highlight both successes and areas needing improvement, and they should be shared with all relevant stakeholders to maintain transparency.

6. **Identify the most appropriate fora** for presenting, reviewing and actioning monitoring findings where necessary (eg, relevant departmental or University committee or other body).
7. Based on the monitoring findings, **make necessary adjustments** to the practice. This might involve refining procedures, providing additional support, or modifying objectives to better align with equality goals.
8. **Adopt a cycle of continuous improvement** where the practice is regularly reviewed and refined. Use the monitoring data to inform these reviews and ensure the practice evolves to meet the needs of all groups effectively.
9. **Keep appropriately detailed records** of the monitoring process, including the data collected, analysis conducted, decisions made, and adjustments implemented. This documentation is vital for accountability and future evaluations.

[Click to go to EIA Template](#)

Question 9 – Next steps

Once the EIA has been fully completed, next steps are likely to include:

1. Presenting findings of the EIA to relevant decision-makers as defined in your monitoring arrangements
2. Acting on the mitigations identified during the EIA process.
3. Communicating the outcomes to stakeholders, which might include those who have been consulted during the process to ensure transparency.
4. Setting up the monitoring arrangements.
5. Training and awareness in how to implement the recommendations of the EIA appropriately.
6. Documenting next steps to serve as a reference for future practice and demonstrating the University's commitment to EDI.
7. Using insights from the EIA to inform future practices, this might include lessons learned into ongoing planning and decision-making to continuously improve equality outcomes.
8. Monitoring the impact(s) of the implemented practice through data and insights from stakeholders.

Ensure that a copy of the EIA Screening tool or full EIA template is appropriately retained in your department or Division, together with any associated data or evidence.

[Click to go to EIA Template](#)

Annex A – Example A for illustrative purposes

1. Screening

The University proposes a new training program aimed at improving the digital skills of its staff. The first step is to determine if an EIA is needed. Given the potential impacts on staff with varying levels of digital proficiency, it is decided that a full EIA is necessary.

2. Equality analysis - identification of equality issues

The University identifies the key equality issues and groups that might be affected by the new training program. This includes:

- Assessing potential impacts on groups of staff who may be less digitally proficient (eg, potentially older workers who do not use IT routinely in the course of their work)
- Considering impacts on staff with disabilities that might affect their ability to participate in digital training
- Evaluating effects on staff from different ethnic backgrounds and languages
- Understanding implications for part-time or temporary staff who may have less access to training opportunities

Stakeholders, including current staff, union representatives, and diversity officers, are consulted to identify specific concerns and areas of focus for the EIA.

3. Data Collection and Analysis

Relevant data is collected to understand the current situation and potential impacts. This includes:

- Demographic data of current staff
- Surveys on current digital skills levels and training needs
- Feedback from focus groups with different staff groups
- Information on existing barriers to training participation

4. Consultation and Engagement

The University engages with a wide range of stakeholders to gather input on the new training program. This includes:

- Holding focus groups and feedback sessions to discuss the proposed training program
- Distributing surveys to gather broad feedback from all staff
- Consulting with staff network groups representing different equality strands
- Meeting with union representatives and employee resource groups

5. Assessment of Impact

The potential impacts of the new training program are analysed based on the collected data and feedback. This involves:

- Identifying any potential positive impacts, such as improved digital skills and increased confidence in using technology

- Highlighting any potential negative impacts or unintended consequences for specific groups
- Assessing the overall effectiveness of the programme in promoting equality

6. Mitigation and Improvement

Based on the assessment, measures are developed to mitigate any negative impacts and enhance positive outcomes. For the digital skills training program, this might include:

- Ensuring that training sessions are accessible to all staff, including those with disabilities (eg, providing materials in accessible formats, offering assistive technologies)
- Offering training at various times to accommodate part-time and temporary staff
- Providing additional support for older staff or those who are less digitally proficient, such as introductory sessions or one-on-one support
- Ensuring that training materials are available in multiple languages if needed

7. Decision Making

The findings of the EIA, including identified impacts and proposed mitigation measures, are presented to the University's project team and relevant decision-making bodies. They use this information to make informed decisions about the final training program, ensuring that it promotes equality and addresses any potential issues.

8. Monitoring and Review

Once the new training program is implemented, the University establishes a monitoring program to track its impacts. This includes:

- Regularly collecting and analysing data on participation rates by different staff groups
- Monitoring feedback from participants to assess the effectiveness and inclusivity of the training
- Adjusting the program based on ongoing feedback and evaluation

9. Reporting and Documentation

The University documents the EIA process as part of its project documentation, including the findings, decisions made, and actions taken. This report is made available to demonstrate transparency and accountability. Periodic updates are provided to report on the outcomes of the program and any adjustments made based on monitoring results.

Annex A – Example B for illustrative purposes

Practice: The University would like to organise a career fair for students aimed at promoting employment opportunities.

Step 1: Screening

Aim of the Event: To provide students from diverse backgrounds with equal access to career opportunities.

Potential Impact: The event may positively impact students from under-represented groups but could inadvertently exclude certain groups if not planned inclusively.

Step 2: Data Collection

- Collect data on attendees' demographics (age, gender, ethnicity, disability status, socio-economic background, etc.) voluntarily and anonymously.
- Review any feedback from previous similar events to assess impact on people

Step 3: Impact Assessment

Positive Impacts:

- Students from diverse backgrounds gain exposure to a wide range of employers.
- Facilitates networking and mentoring opportunities for under-represented groups.
- Workshops and seminars improve employability skills across diverse student populations.

Negative Impacts:

- Potential barriers to access for students with disabilities if venue or materials are not appropriately accessible.
- Risk of under-representation of certain minority groups if efforts are not made to ensure inclusive participation.

Step 4: Mitigation Measures

- Ensure the event venue is accessible to individuals with disabilities (eg, wheelchair access, sign language interpreters, induction loops, available quiet room).
- Use diverse imagery and language in promotional materials to encourage attendance from all student demographics.
- Ensure a diverse panel of speakers and employers representing different backgrounds and industries.
- Brief speakers on accessible presenting techniques

Step 5: Monitoring and Review

- Review feedback forms to assess attendee satisfaction and identify areas for improvement.
- Analyse demographic data to ensure participation and outcomes are equitable across all groups.
- Use insights gained to inform future events and ensure ongoing inclusivity and diversity in career fairs.

Annex B – Equality Impact Assessment Screening Tool

This screening tool is designed to help you decide whether a full Equality Impact Assessment (EIA) is required when developing or reviewing an existing practice (also see flowchart on p25). It is to be used at the earliest stage of the development of a new practice or change to existing practice by those responsible for the practice’s development or revision. This ensures that equality is considered from the development phase of the practice. It is not necessary to complete this form if it is clear early on during screening that an EIA will be necessary, instead screening can stop and you can move to the full EIA.

1. Name of practice
2. Brief reason for practice
3. Is this a new practice or a revision/review of an existing one?
New <input type="checkbox"/> Go to Q6
Revision/review <input type="checkbox"/> Go to Q4
4. Was an EIA carried out for the previous version?
Yes <input type="checkbox"/> Go to Q5
No <input type="checkbox"/> Go to Q6
5. Does the revision or review of the practice highlight the need for any changes that were not considered in the original EIA
Yes <input type="checkbox"/> Revise existing EIA
No <input type="checkbox"/> EIA is complete
6. Will this practice affect people (staff/students/visitors/contractors/members of the public)?
Yes <input type="checkbox"/> Go to Q6a
No <input type="checkbox"/> Go to Q8
6a. How many people, how significantly?

7. Could the practice affect people with different protected characteristics or backgrounds in different ways?	Yes	No	No impact
Protected Groups:			
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability or long-term health condition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage or civil partnership (employment only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including colour, nationality and ethnic or national origins)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other groups			
Parenting responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<u>Caring responsibilities</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Socio-economic background</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Part-time staff</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other groups:			
Parenting responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Caring responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Socio-economic background	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part-time staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have answered yes to any of the groups in Q7 above, [carry out a full EIA](#).

If you answered no to all groups in Q7, go to Question 8.

		Yes	No
8.	Could this practice lead to complaints or concerns from staff, students, visitors, contractors or members of the public?	<input type="checkbox"/>	<input type="checkbox"/>
9.	Is there potential for the practice to impact on our existing staff/student practices (eg, recruitment, student admissions, redundancy, harassment, health and safety, staff or student welfare services?)	<input type="checkbox"/>	<input type="checkbox"/>
10.	Will this practice affect how we commission services?	<input type="checkbox"/>	<input type="checkbox"/>
11.	Is there potential for this practice to create additional workload for our staff?	<input type="checkbox"/>	<input type="checkbox"/>

If you have answered yes to any of Q8-11, [carry out a full EIA](#).

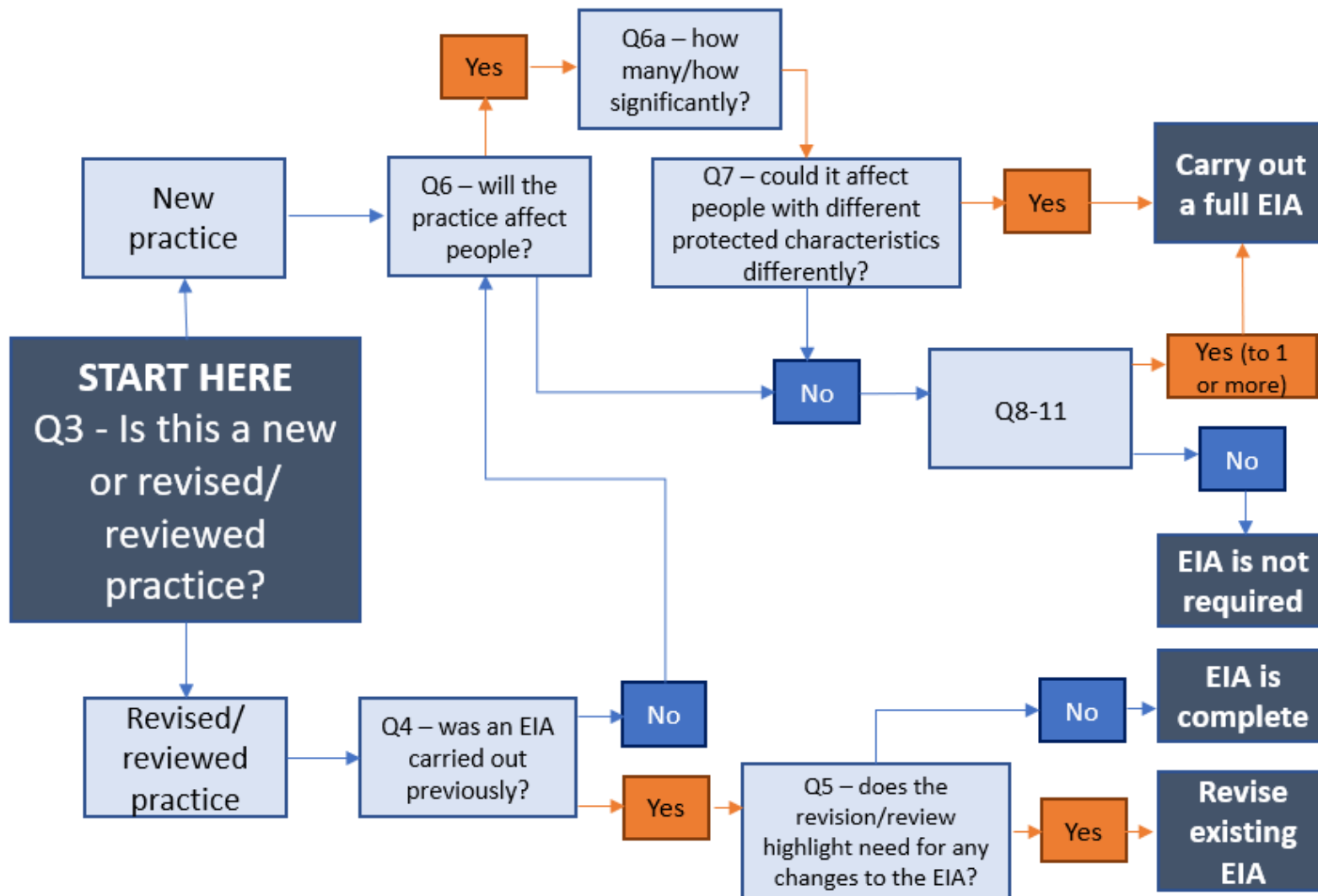
If you have answered no to all of Q8-11, **an EIA is not required at this time**. Remember to review this if any changes are made, as it may then become necessary to carry out an EIA

Ensure that a copy of this completed screening form is appropriately retained in your department or Division, together with any associated data or evidence.

Name	
Job title	
Department	
Date	

If you have any questions or queries, please contact the EDI Team: equality@admin.ox.ac.uk.

Annex B – Screening Tool Flowchart



Annex C – Equality Impact Assessment Template

Please refer to the guidance for each question.

1. What is the overarching practice being made, amended or reviewed? Click for guidance

2. What is the aim of the new or revised practice? Click for guidance

3. What is the brief background to the practice, including any evidence and any consultation which has already taken place to initiate it (stating how the evidence / data gathered has been used to assess the impact of the practice)? What further evidence might be required to support the assessment? Click for guidance

4. Who is likely to be affected by the practice? Click for guidance
Staff <input type="checkbox"/>
Students <input type="checkbox"/>
Staff and students <input type="checkbox"/>
Other Group(s) <input type="checkbox"/> (please specify):

5. Could the practice affect people with different protected characteristics in different ways? Please indicate whether the practice is likely to have a positive or negative impact (or potentially both) on equality for the following groups by checking all boxes that apply. Click for guidance	Positive impact	Negative impact	No impact
Protected Characteristics			
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability or long-term health condition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage or civil partnership (employment only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including colour, nationality and ethnic or national origins)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other groups			
Parenting responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Caring responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Socio-economic background	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part-time staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Where a positive or negative impact has been identified in Question 5, please describe the likely equality impact(s) on each of the identified groups, including the number of people affected and the significance of that impact ([Click for guidance](#))

7. If there are any negative impacts, how can these be mitigated against? If a negative impact has been identified which cannot be fully mitigated, can the practice be changed to remedy negative impact(s) entirely? Is any residual negative impact justifiable, lawful and unavoidable? ([Click for guidance](#))

8. How will the impact of the practice be monitored and reviewed, especially where a negative impact has been identified and cannot be mitigated? ([Click for guidance](#))

9. What are the next steps for the practice? ([Click for guidance](#))

Ensure that a copy of this completed screening form is appropriately retained in your department or Division, together with any associated data or evidence.

Equality Impact Assessment carried out by:	
EIA Approved by: (manager/committee)	
Date:	
Review Date:	

Glossary

<p>Advancing equality of opportunity</p>	<p>Advancing equality of opportunity means making sure everyone has a fair chance to succeed, regardless of their background or circumstances. It involves identifying and removing barriers that might prevent people from accessing the same opportunities and providing additional support where needed to level the playing field. This can be achieved by:</p> <ul style="list-style-type: none"> • Understanding the challenges and obstacles that different groups might face in accessing opportunities. • Implementing policies and practices that eliminate these obstacles, ensuring everyone has equal access. • Offering extra help or resources to those who need it, so they can take full advantage of opportunities. • Making sure everyone is treated fairly and has the same chances to succeed, regardless of their background.
<p>Caring responsibilities</p>	<p>An individual has caring responsibilities if they look after a dependant because of one or more of the following reasons:</p> <ul style="list-style-type: none"> • they have an illness or injury (whether physical or mental) that requires, or is likely to require, care for more than three months • they have a disability for the purposes of the Equality Act 2010 • they require care for a reason connected with their old age
<p><u>Direct discrimination</u></p>	<p>Direct discrimination is less favourable treatment directly because of a protected characteristic (eg, not appointing/promoting a candidate <i>because of</i> their sex, disability, race/ethnicity, sexual orientation, etc). Normally this type of discrimination cannot be justified and will be unlawful. (Also see indirect discrimination below).</p>
<p>Disability</p>	<p>The definition of disability under the Equality Act 2010 is, “a physical or mental impairment that has a ‘substantial’ and ‘long-term’ adverse effect on a person’s ability to carry out normal day-to-day activities.” Substantial means more than trivial. This can include, but is not limited to, mobility issues, sensory impairment, health conditions such as diabetes or epilepsy, chronic fatigue syndrome, Long Covid, mental health conditions, and some neurodivergence.</p>

Due regard

To 'have due regard' means that in making decisions and in its other day-to-day activities, the University must consciously consider the need to meet the aims set out in the general equality duty, eg, eliminate discrimination, advance equality of opportunity and foster good relations.

How much regard is 'due' will depend on the circumstances, particularly on how relevant the aims of the general equality duty are to the specific practice or decision in question. For example, in a University setting, decisions about student admissions policies or the allocation of research funding will have a much greater impact and be more relevant to the aims of the duty than, say, the procurement of office supplies. As such, these decisions will require a higher degree of regard to the equality duty.

The three aims of the duty may be more relevant to some functions than others; or they may be more relevant to some protected characteristics than others, eg:

- One or more of the aims are likely to be highly relevant to the University's policy on flexible working arrangements, given its direct impact on staff with different protected characteristics such as disability or those with caring responsibilities, but may be less relevant to the University's policy on waste management.
- The development of University policies on inclusive facilities, are likely to be particularly relevant to the protected characteristics of religion and belief and gender reassignment. These policies directly impact the ability of students and staff to practice their faith. They also ensure safe and respectful spaces for individuals undergoing gender reassignment to have access to facilities such as gender-neutral restrooms and private changing areas.. In contrast, this area might have less relevance to characteristics such as age or marriage/civil partnership.

Those within the University who make decisions that affect, or might affect, people with different protected characteristics must be fully aware of their duty to consider the aims of the equality duty in their decision-making processes.

Due regard is fulfilled before and at the time a particular practice is under consideration that is likely to have an equality impact on people, as well as at the time a decision is taken. It involves a conscious approach and state of mind. The institution cannot satisfy the duty by justifying a decision after it has been taken. Attempts to justify a decision as being consistent with the exercise of the duty when it was not, in fact, considered before the decision are not enough to discharge the duty.

<u>Discrimination arising from a disability</u>	Treating someone unfavourably because of something arising from their disability where that treatment is not a proportionate means of achieving a legitimate aim. This type of discrimination can be justified if the treatment is a proportionate means of achieving a legitimate aim.
<u>Failure to make reasonable adjustments</u>	Failing to make an adjustment that is reasonable in order to avoid a disadvantage that a disabled person suffers because of a provision, criterion or practice, or physical feature, or lack of an auxiliary aid. The University may have a specific obligation to make a particular reasonable adjustment for a specific individual. The University also has an obligation to make anticipatory reasonable adjustments to ensure disabled students and staff can fully participate and access facilities / services (including all teaching and learning activities)
<u>Fostering good relations</u>	Fostering good relations means creating an environment where different groups of people understand, respect, and get along with each other. In the context of equality and inclusion, it involves promoting positive interactions and reducing prejudice and discrimination. This can be achieved by: <ul style="list-style-type: none"> • Promoting understanding by encouraging people to learn about and appreciate different cultures, backgrounds, and perspectives. • Ensuring that everyone treats each other with kindness and respect, regardless of their differences. • Building connections by creating opportunities for people from diverse groups to interact, collaborate, and build positive relationships. • Reducing prejudice by working to eliminate negative stereotypes, biases, and discrimination.
<u>Harassment</u>	Harassment is unwanted conduct related to a protected characteristic (or unwanted conduct of a sexual nature) that has the purpose or effect of violating another person’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for another person
<u>Indirect discrimination</u>	Indirect discrimination occurs when everyone is treated the same but people with a protected characteristic are put at a particular disadvantage by a working practice, policy or rule; and that working practice, policy or rule cannot be justified as a proportionate way of achieving a legitimate aim (eg, including a specific number of years’ experience in job selection criteria may indirectly discriminate against younger people and requiring everyone in a particular role to work full-time may indirectly discriminate against women and those with caring responsibilities). This type of discrimination can be justified if the working practice, policy or rule is a proportionate means of achieving a legitimate aim.
<u>Long-term</u>	‘Long term’ is defined as a health condition which has lasted or is likely to last for at least a year.

<p>Parenting responsibilities</p>	<p>Parenting responsibilities encompass the legal rights and duties associated with raising a child (under the age of 18), including decision-making about the child's welfare, education, and healthcare. Parental responsibility is automatically granted to biological mothers and can be acquired by fathers and others, including same-sex parents, through legal means such as birth registration or court orders, including surrogacy arrangements. Adoption transfers parental responsibility from birth parents to adoptive parents, who then have full legal responsibility for the child. The legal framework ensures that various family structures, including those formed by same-sex couples, are recognised and supported, with the child's welfare as the primary concern.</p> <p>When considering equality impacts based on parenting responsibilities, it is helpful to consider different aspects of parenting, eg, parents of new babies or newly adopted children (NB maternity is a protected characteristic under the Equality Act 2010), parents of children with additional needs (such as disability) or other challenges, parents of school age children and parents who are also carers (sometimes called 'sandwich carers').</p>
<p><u>Part-time</u></p>	<p>University staff work part-time if their contracted hours are less than 100% FTE (full time equivalent). Part-time staff are specifically protected under the Part-time workers (prevention of less favourable treatment) regulations 2000.</p>
<p><u>Positive action</u></p>	<p>Positive action is action that is taken to overcome or minimise disadvantages experienced by people who share a protected characteristic, to meet their different needs or to overcome disproportionately low participation rates by people who share a protected characteristic. It is not the same as positive discrimination (eg employing someone because they are a woman) which is illegal in the UK. If you are considering positive action please check the guidance on the EDU website (link) and seek advice from EDU (equality@admin.ox.ac.uk).</p>
<p>Practice</p>	<p>Any action, policy, or decision that affects people within the University should have an EIA. This includes new or revised policies, new programs or services, major projects, organisational changes, and events.</p>
<p>Pregnancy and maternity discrimination</p>	<p>treating a woman unfavourably because of her pregnancy or because of a pregnancy-related illness or because she is on maternity leave (or is exercising, seeking to exercise or has exercised the right to maternity leave) or in respect of students, (during the 26 weeks beginning with the day the baby is born) because she has given birth</p>
<p>Protected characteristic</p>	<p>the Equality Act 2010 identifies nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership (in respect of employment only), pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex, and sexual orientation</p>

<p>Socio-economic background</p>	<p>Oxford uses various measures of disadvantage when considering student applications, from a range of sources of available data. The main measures are:</p> <ul style="list-style-type: none"> • Educational disadvantage, which looks at the average performance of schools at GCSE and A-level. • Socio-economic disadvantage, which looks at ACORN and POLAR data for the applicant’s home postcode. <p>Oxford is also aware of students who have been in care, based on information provided in the UCAS application.</p> <p>Socio-economic data is not routinely collected for staff through PeopleXD. However, an aspect of socio-economic background data was collected in the Staff Experience Survey 2023.</p>
<p>Victimisation</p>	<p>subjecting someone to a detriment because they have (or intend to do) a protected act. A protected act includes raising concerns of discrimination or harassment, and providing evidence or information in respect of those concerns</p>