

Equality Impact Assessment (EQIA)

Subject of EQIA

Details of requester

Name	[REDACTED]
Section/Project	Information Security Group / Acceptable Use of Assets Policy

Details of accountable Director

Director name	[REDACTED]
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Document control (to be completed at each iteration)

Date	Author	Notes	Version number
21/03/2023	[REDACTED]	First Draft	V0.1
18/04/2023	[REDACTED]	EDI Group feedback	V0.2
14/06/2023	[REDACTED]	Policy updated	V0.3

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Summary

Date	27/04/2023
IG Casework ref	CW-2023-081
Summary	
<p>This EQIA relates to the Acceptable Use of Assets Policy, which is subject to annual review by the Information Security Group (ISG).</p> <p>There is evidence that there could be potential negative impacts of the policy against the protected characteristics of age and disability.</p> <p>While RoS as an organisation can and does make digital accessibility support available to individuals requiring vision, hearing, motor, or cognitive assistance, the terms of this policy do not make clear that such adjustments to IT assets can be authorised.</p> <p>This omission could lead to the belief that reasonable adjustments to IT assets are not available.</p> <p>These potential negative impacts are mitigated by the recommended action outlined below.</p> <p>Following approval of this EQIA, the policy has been updated, implementing the recommended action.</p>	
Impact summary	
Impact	Recommended Action
<p>Potential Negative - Age</p> <p>Potential Negative - Disability</p>	<ul style="list-style-type: none"> Update policy to include a clear provision for digital accessibility
Review date	March 2024

Comments

EDI Group and/or EDI Specialist	Name: EDI Colleague Forum Date: April 2023
EQIA has been reviewed by EDI Colleague Forum – no further potential impacts to any groups with protected characteristics were identified.	

Senior staff approval or oversight required

Role	Approval/oversight/none
Keeper	
Accountable Officer	
Director - Registration	
Director – Business Development	
Director - Corporate	Approval
Other (specify)	

Section 1: Framing

Text shown in *italics* is intended to act as a prompt for information to include in each section

See [EQIA Guidance](#) and [PAL Playlist](#) for further assistance.

1. Proposal Outline
What is the scope of this Equality Impact Assessment (change phases/stages)? Brief background information can be included if this is necessary to frame the proposal
The RoS Acceptable Use of Assets Policy, which outlines acceptable use of information technology and systems.
What are the aims or purpose and anticipated outcomes of the change (such as a new policy, decision, procedure or relevant practice)?
While the policy has been subject to a recent annual review by the Information Security Group and there are no imminent changes planned, it has not previously been subject to an EQIA.
Please indicate who is most likely to be affected by the change? <i>For example: Employees, visitors, contractors, women, men, young people, older people, people with disabilities etc.</i>
This policy applies to all employees, contractors and third-party suppliers.
Which aspects of the change are particularly relevant to any element of the general equality duty?
Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.

Section 2: Impacts Identification and Evidence

Does evidence suggest any potential contribution of the change against the needs of the general equality duty? Consider each aspect in the table below.

Public sector equality duty	Aspects of change which contributes to or influence duty	Explanation/evidence of contribution or influence
<p>Eliminating unlawful discrimination, harassment and victimisation</p>	<p>Policy as written could give rise to indirect discrimination.</p>	<p>This policy states that:</p> <ul style="list-style-type: none"> • “Only authorised software is permitted to be installed on our IT equipment” • “The use of removable or portable storage devices such as memory sticks, CDs, DVDs and removable hard drives are strictly prohibited without prior authority from IT Security. This includes any peripheral hardware with a data storage capability (i.e. printer, scanner, etc)” <p>The policy does not explain that there is accessibility support available to individuals requiring vision, hearing, motor, or cognitive assistance (e.g., screen reading software or the option to print a hard copy of a text).</p> <p>This could give individuals the impression that reasonable adjustments to IT equipment and information systems would not be authorised under the terms of this policy.</p>
<p>Advancing equality of opportunity</p>	<p>Policy as written does not consider people with health conditions or impairments.</p>	<p>This policy does not make it explicit that:</p> <ul style="list-style-type: none"> • RoS does have digital accessibility tools available. • RoS does offer digital accessibility support to remove or reduce disadvantages suffered by individuals requiring vision, hearing, motor, or cognitive assistance.

Promoting good relations	Policy as written does not encourage understanding and awareness of people with health conditions or impairments.	This policy does not address the availability of IT accessibility tools or the possibility for reasonable adjustments.
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Does evidence suggest any potential for impacts on the following groups? Consider each characteristic in the table below.

Protected Characteristic	Impact (positive or negative)	Explanation/evidence of impact	Proposed actions/modifications
Age (e.g. older people, children and young people)	Potential negative for older people	<p>Certain eye conditions are more common as we age (source: Age UK).</p> <p>Around 40% of people over 50 in the UK have some form of hearing loss (source: Age UK).</p> <p>Osteoarthritis most often develops in people in their mid-40s or older and commonly affects the hands (source: NHS)</p>	<p>Update the policy to make it clear that:</p> <ul style="list-style-type: none"> • Digital accessibility tools are available for individuals requiring vision, hearing, motor, or cognitive assistance. • Guidance about these tools is available on RoSnet. • Further support with digital accessibility is available through discussion with the Employee Enablement team.
Disability	Potential negative	<p>Under equality law, RoS is under a positive and proactive duty to take steps to remove or reduce or prevent the obstacles a disabled worker faces.</p> <p>As currently written this policy does not acknowledge that RoS can make available IT accessibility tools for individuals requiring vision, hearing, motor, or cognitive assistance.</p>	<p>Update the policy to make it clear that:</p> <ul style="list-style-type: none"> • Digital accessibility tools are available for individuals requiring vision, hearing, motor, or cognitive assistance. • Guidance about these tools is available on RoSnet. • Further support with digital accessibility is available through discussion with the Employee Enablement team.

Gender reassignment (Where a person is living as the opposite gender to their birth)	No differential impact identified	n/a	n/a
Pregnancy and maternity			
Race, ethnicity, colour, nationality or national origins (including gypsies or travellers, refugees or asylum seekers)			
Religion or belief (including non-belief)			
Sex/gender			
Marriage and civil partnership			
Sexual orientation			
Other (any other relevant group not covered above e.g. socio-economic)			

2.2 Evidence gaps
Are there any gaps in the evidence you currently hold? Is any action planned to fill these gaps?
No evidence has been identified that would suggest that there is the potential for positive or negative impacts on any other groups with protected characteristics beyond those identified above.

The EQIA has been reviewed by the EDI Colleague Forum and no concerns about further impacts on any groups with protected characteristics were raised.

This position will remain under review, and the EQIA will be updated accordingly if new feedback or evidence becomes available.

Section 3: Impact Assessment and Actions

Relevant protected characteristic	Impact	Mitigating actions included and required	Owner
1. Age	<p>Potential Negative</p> <p>The policy as currently written could give the impression that RoS does not make digital accessibility tools and support available if they are required.</p>	<p>Included: n/a</p> <p>Required: Update the policy to include a provision for Digital Accessibility:</p> <ul style="list-style-type: none"> RoS can authorise the use of digital accessibility tools in instances where vision, hearing, motor, or cognitive assistance is required. Support and advice are available through discussion with the Employee Enablement team. 	██████████
2. Disability	<p>Potential Negative</p> <p>The policy as currently written could give the impression that RoS does not make digital accessibility tools and support available if they are required.</p>	<p>Included: n/a</p> <p>Required: Update the policy to include a provision for Digital Accessibility:</p> <ul style="list-style-type: none"> RoS can authorise the use of digital accessibility tools in instances where vision, hearing, motor, or cognitive assistance is required. Support and advice are available through discussion with the Employee Enablement team. 	██████████

Review date	March 2024
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