Stage 1: Rapid Impact Checklist

Document title: Policy Document Governance Policy
Author & Faculty/Other Academic Unit/Service: Dr Dianne Peden, Head of
Governance and Deputy Secretary

Reason for the Equality Impact Assessment:

Proposed new document	X
Proposed change to existing document	
Review of existing document	
Other (please state):	

Could any protected characteristics be affected by this proposal?[1]

Yes	No
X	

If yes, which protected characteristic groups could be affected?

Age	X	Disability	X
Gender reassignment	X	Pregnancy and maternity	X
Race/ethnicity	X	Religion or belief (including lack of belief)	X
Sex	X	Sexual orientation	X

Will the proposal have any impact on:

	Yes	No
Discrimination?	X	
Equality of opportunity?	X	
Relations between groups?	X	

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[1] 'Proposal' is used as shorthand for any policy, procedure, strategy or proposal that might be assessed.

Will the proposal have an impact on the physical environment? For example, will there be impacts on:

Living conditions?	No
Working conditions?	No
Pollution or climate change?	No
Accidental injuries or public safety?	No

If the answer to any of the above is 'yes', please proceed to complete the Comprehensive Equality Impact Assessment, overleaf.

Stage 2: Comprehensive Equality Impact Assessment (CEIA)

Details of document

Document title	Policy Document Governance Policy
Document owner	Dr Dianne Peden
Faculty/Other Academic Uni/Service	Governance Office

Aim of the document

What are the aims and objectives of the document?
The policy aims to create a clear and consistent process for the development and review of all policy documents across the University. The objectives of the policy are set out under section 3. Policy Statement – "This policy is intended to fulfil the following objectives for the University: a) providing the University community with high quality, accessible and easily understood policy documents.   b) aligning policy documents with University strategy   c) complying with legislation and all other legal requirements.   d) reflecting and embedding our values of fairness, equity, diversity and inclusion.   e) supporting University business and efficiencies in its operations.   f) promoting consistency and supporting quality assurance, monitoring and systemised review of policy documents.   g) reducing risk.   h) fulfilling governance, academic and operational needs."

How important is the document in terms of equality in the University? Does it relate to an area with known inequalities or where equality objectives have been set by the University?
The policy does not aim to address a specific area with known inequalities or specific equality outcomes, however as the policy aims to ensure a consistent process for policy document development and review across the University it will affect all university policy documents and as such may indirectly affect all protected characteristics. Each policy document will continue to follow the current Rapid Equality Impact Assessment (EIA) screening process to identify whether a comprehensive EIA is required will become part of policy document development and review, and specific inequalities and equality outcomes for individual policy documents will be identified as part of this process. The policy sets out that all policy documents must be written in line with our legislation and all other legal requirements (objective (b)) and as such all policy documents will require consideration of relevant equality legislation and statutory requirements, such as the Equality Act 2010, the Hate Crime and Public Order (Scotland) Act 2021, British Sign Language (BSL) Act 2022, Defamation and Malicious Publication (Scotland) Act

2021, Higher Education Statistics Agency (HESA) annual returns, Complaints reporting, etc. In addition, objective (c) aims to ensure the University's is 'reflecting and embedding our values of fairness, equity, diversity and inclusion.'

The policy forms part of a proposed Policy Document Governance Framework (together with the Policy Document Governance Procedure), which aims to address challenges with locating policy documents, understanding of approval routes and management of review cycles. As part of this work, an online Policy Document Library will be put in place to better capture information, including whether an EIA has been completed and where this has been published (intranet or website). The Library will help to manage University policy documents from an administrative point of view, improve access to relevant documentation and quality control of EIA processes for all policy documents.

Who is affected by the document and how have they been involved in the development of it?

The policy will directly affect policymakers, and anyone involved with policy document development or review at the University. As outlined in section 3.4. and 3.5., the Policy Document Owner will be a member of the Senior Management Team (SMT), and they will designate the Policy Document Author (e.g. Chief Digital Officer). In some instances, the Policy Document Owner may also act as the Policy Document Author.

Consultation was sought with SMT at its meeting on 7 October 2024, who approved the accompanying Policy Document Governance Procedure, and considered and recommended this policy to the Governance and Nominations Committee (GNC) for approval at its meeting on 24 October 2024. An additional informal consultation was held with the Director of Student and Academic Services and the Director of People Services on 10 October 2024. Various other informal consultation took place including discussions with various policy document authors including the Chief Digital Officer and other individuals who will be involved with the creation of the online Policy Document library including the Head of Marketing.

This policy will also indirectly affect all staff, students, and associates of the University, as it will apply to Strategies, Policies, Regulations, Guidelines and Procedures in all areas of the University (e.g. people services, teaching, academic research, etc). Further consultation is planned with key stakeholders, in particular to agree Categories and Sub-Categories for the classification of these documents and to support work in Phase 2 to develop robust reporting mechanisms (including interactive reporting and review dashboards).

The Head of Governance and Deputy Secretary will work with Comms with regards to a Communication plan when the online library is ready to be launched. In the meantime, this policy and the associated procedure documents will be hosted on MyAbertay and appropriate comms will also take place when they published.

Are any persons affected by the document likely to benefit from it and in what way?
The policy will likely provide benefit to staff and students across the University, and policymakers in particular, by providing increased clarity and consistency around policy development and access to relevant documents.

The policy includes requirements to ensure policy documents are accessible and use inclusive language, including gender inclusive, disability inclusive and racially inclusive language. This will likely benefit anyone who falls within the protected characteristics of disability, gender reassignment, sex, and race, addressing barriers to inclusion, such as access to information and elimination of discriminatory language in corporate documents.

Disabled staff and students will also likely benefit from the requirement to use standard text to provide the document in different formats (e.g. large print, braille) which will be applied to all policy documents. |

Is there any evidence or concern that any of the protected characteristic groups have different experiences, issues or needs in relation to this document? (Please provide details in the box below)

Age		Race	
Disability	X	Religion or Belief	
Gender Reassignment		Sex	
Pregnancy & Maternity		Sexual Orientation	
Marriage & Civil Partnership			

Further information: Evidence from our consultation with SMT resulted in the addition of text to the Policy Document Governance Procedure, which accompanies this policy, to outline how to changes from policy reviews are recorded. Tracked changes are considered an effective tool to demonstrate changes resulting from a policy review when the document is submitted for approval to a governing authority, such as SMT, University Court, or a standing committee of Senate. However, tracked changes on documents can be inaccessible for some disabled people (dyslexia, screen reader users, etc.).

Considering this impact, the below text was added to the procedure document to ensure that where a document is submitted with tracked changes there will be a requirement to provide an accompanying summary of the changes made, including the reasons for the change (e.g. legislative change), as well as a 'clean copy' of the updated document. Policy Document Governance Procedure – 3.4.2. Revision or development of content "Changes proposed to existing policy documents can be marked up using strikethrough for text to be removed and purple text for any additions or via the use of tracked changes. When tracked changes is used, formatting edits such as updating font size etc. must be

accepted prior to the submission of policy documents for approval and any accompanying comments should also be deleted and the changes summarised in the coversheet and/or executive summary. A clean version should also be provided."

How does the document fit into the broader strategic aims of the University?

This policy algins with Abertay's Strategic Plan overall, as it will apply to all Strategies, Policies, Regulations, Guidelines and Procedures across University areas.
 	
The policy relates in particular to the following:
 	
- Guiding principles:
    - to provide opportunities to change lives and giving our students and staff the skills, they need to thrive in a world of change.
    - to promote fairness and equality of opportunity in everything we do.
- Aims:
    - Providing an excellent student experience, giving them the skills to succeed at work
    - Our innovative use of digital technology across all activities
    - Supporting staff to develop in the workplace and have satisfying careers
    - Being a leader in enabling access to university for student from a wide range of backgrounds
 	
The policy also aligns with the Abertay University (Scotland) Order of Council 2019, the accompanying Policy Document Governance Procedure (approved by SMT on 7 October 2024), the University's Scheme of Delegation and Equality, Diversity and Inclusion Policy, as noted in section 5. Related Policy Documents and Supporting Documents.

Consideration of available data

(Consider what data is available. Data can include surveys, focus groups, analysis of complaints made, feedback received, consultations, etc.)

What do we know from existing data already held by the University?
See question: Is there any evidence or concern that any of the protected characteristic groups have different experiences, issues or needs in relation to this document? An initial review of existing policy documents identified in excess of 250 policy documents which will be part of the online library.

What do we know from existing data which is available externally?
Review of practice elsewhere including discussions with the St Andrews University who have a similar online repository for their polices and procedures.

Are there any apparent gaps in knowledge?
No

Impact of document

Could this document lead to any positive, negative, intended or unintended impact on the University or any of its stakeholders?
See question: Are any persons affected by the document likely to benefit from it and in what way?

Could there be a differential[2] impact on any protected characteristics? Could any differential impact be adverse?
No known or evident adverse impact on any protected characteristic. See question: Is there any evidence or concern that any of the protected characteristic groups have different experiences, issues or needs in relation to this document?

Please consider:

Is this policy directly discriminatory? If yes, is it intended to increase equality? If no, this is unlawful discrimination.

Is this policy indirectly discriminatory? If yes, is this justifiable or proportionate? If no, this is unlawful discrimination.

If this policy is not indirectly discriminatory, but could have an adverse impact on any of the protected characteristics, you must provide details of how the University will act to address this.

Is this policy unlawfully discriminatory? If you find that it is, you must decide how the University will act lawfully.

Consultation

What did this equality analysis conclude?
This policy is not directly or indirectly discriminatory, changes made to the accompanying procedure document have mitigated impact on specific protected groups. The policy is unlikely to have a negative impact.

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[2] Differential impact = where the positive or negative impact on one particular protected characteristic is likely to be greater than on another.

Is any action required to be taken in response to the findings from the consultation?
No further action required at this stage. Further and/ or ongoing consultation will be required for the subsequent areas of work including the creation of the online library and associated policy document library.

What is the recommendation for this document following consultation?

Reject the document		Approve and publish the document	X
Amendment required		Other (please provide details below)	

Declaration

I confirm that this equality analysis represents a fair and reasonable view of the implications of the document for all protected characteristic groups, and that appropriate actions have been identified to address the findings.

Dr Dianne Peden	**CEIA owner**
Ms Caroline Summers (Vice-Principal and University Secretary)	**Line manager** (if appropriate)

Committee approval

Which Committee has this document gone before for approval?
SMT on 7 October 2024 recommended the policy to GNC for approval.
Date of Committee meeting: 24 October 2024

Following Committee consultation, what is the decision for this document?

Reject the document		Approve and publish the document	X
Amend the document		Other (please give details below)	

If the Committee requires that the document be amended, please list amendments below.