

**Equality Impact Assessment (EIA) Recording Form**

Please refer to the notes and examples in the EIA Guidelines to help complete this record.

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| Title of Activity/Proposal/Policy/Practice | British Sign Language (BSL) Plan 2024 to 2030 | | EIA Team and Lead Member of Staff (names of all people involved in this EIA) | * EDI Lead * BSL Plan Steering Group * Access and Inclusion Strategy Group | Date | 06/03/2024 |
| Type of Policy/Practice/ (tick box) | New | X |
| Existing |  |
| Revised |  |

**Step 1 – Plan your process**

Considering the aims of the policy/proposal and the people will be involved.

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| What are the aims and purposes of the activity/ decision/ new or revised policy or procedure?  See Note 1 | Edinburgh College is required to publish a BSL Action Plan every six years by the BSL (Scotland) Act 2015. The new BSL Action Plan 2024-2030 sets out the progress we made during the past six years and the actions we plan to do in the next six years. |
| Who will be affected?  See Note 2 | Deaf BSL students and staff, lecturers, and people who support deaf BSL users. |
| Who will be consulted?  See Note 3 | * BSL Plan Steering Group members * Learning support staff * Deaf students * BSL teaching staff * Access and Inclusion Strategy Group members |

**Step 2 – Consider the Evidence**

What are the evidence we need and how we can gather them?

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| What evidence is available of how the policy/decision, etc. affects, or may affect, protected groups?  Evidence could be quantitative, qualitative or anecdotal.  Do we have enough evidence to judge what the impact may be?  See note 4 | * Scottish Government BSL Plan * FE/HE Sector BSL Group * Internal consultation meetings with students and staff. * Students’ PI Data * Courses’ PI Data * Progress of BSL Plan 2018 to 2024 |

**Step 3 – Assessing the impact**

This involves:

* Considering relevant evidence relating to people who share a protected characteristic
* Assessing the impact of applying a decision of a new or revised policy or practice against the needs of the Public Sector Equality Duty (PSED) and each protected characteristic.

How will the policy / decision help the College to comply with the Public Sector Equality Duty?

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| **Eliminating discrimination, harassment, and victimisation** | **Advancing equality-**   * **Removing disadvantage** * **Meeting different needs** * **Encouraging participation** | **Fostering good relations**   * **Tackling prejudice** * **Promoting understanding** |
| The plan aims to address the systemic issues that have been identified as key barriers for BSL users to learn, work and visit at the Edinburgh College. | Edinburgh College is committed to creating a culture where all members of the College community are equally valued and respected, where diversity is celebrated and where everyone has the opportunity to fully take part in and benefit from their experience in the College.  All members and prospective members of the College have the right:   * To be treated with respect and dignity. * To be treated fairly. * To receive encouragement to reach their full potential.   Edinburgh College will continue to take a collective responsibility to strive towards making Edinburgh College an inclusive college for deaf people to study, work, and visit by promoting equality and diversity. | This plan fulfils a key College’s strategic goal, “Support each other in an inspirational environment, so we can build our collective resilience and be proud of what we can achieve together”. |

See Note 5

Key Questions to ask:

1. What potential positive/neutral/negative impacts can be identified?
2. What does evidence demonstrate about positive/neutral/negative impacts for different protected characteristic groups? E.g. statistics on participation, progression or outcomes, feedback or complaints
3. Does the policy/procedure/practice/decision take account of the needs of people with different protected characteristics? How is this demonstrated?
4. Does it affect some groups differently? Is this proportionate?

See Note 6

| Protected characteristic | Potential  Positive Impact Y/N | Details of Expected Positive Impact | Potential Negative Impact Y/N | Details of Expected Negative Impact |
| --- | --- | --- | --- | --- |
| Age | Y | The BSL Plan promotes inclusion of all age groups. | Y | Alternative adjustments will be required for those who lost their hearing later in life and have not been taught in BSL. |
| Disability | Y | Learning support and reasonable adjustments are provided to deaf students as part of the general support offered by Learning Support Advisors. | Y | Some deaf BSL users may not consider themselves as having learning needs or disabilities. The College may not be able to plan in advance for a deaf BSL user if they chose not to inform the College. |
| Gender reassignment | Y | The College has a Trans and Non-Binary Inclusion Policy. Individuals will be supported in accordance to the policy. | Y | Currently, the Trans and Non-Binary Inclusion Policy is not translated into BSL. A BSL interpreter will be required when a BSL user wishes to access support under this policy. |
| Marriage/civil partnership (relevant in employment law) | Y | The plan will take into account the communication needs of family members who are BSL users. | Y | The College may not be informed of the communication needs of the family members which may result in our failure to pass on vital information timeously, correctly and respectfully in an emergency situation. |
| Pregnancy and Maternity | Y | Students and employees will be able to communicate with us about their additional needs during pregnancy and maternity. | Y | BSL students and staff will need to engage with non-College BSL interpreters when accessing health services. The College BSL interpreters are exclusively for learning and employment matters respectively. |
| Race | Y | Deaf students and employees will be supported regardless of their ethnicity. | Y | There is limited publicly available information about how deafness impact on people of different ethnic groups. There are regional, national and global differences among sign languages. Scottish BSL interpreters may not be able to support people who learned sign languages in other parts of the country or the world. |
| Religion or belief | Y | Deaf students and employees will be supported regardless of their religion or belief. | Y | There is limited publicly available information about how deafness impacts on people of different religion or belief. Individuals could be inadvertently offended because of our lack of awareness about religious or belief practices. |
| Sex | Y | Deaf students and employees of all genders will be supported. | Y | The college may not always be able to book a BSL interpreter of the same gender as the BSL user who may wish to discuss sensitive matters with our advisors. BSL users may not feel comfortable in disclosing certain information in front of someone who is of another gender. |
| Sexual orientation | Y | Deaf students and employees of all sexual orientations will be supported. | Y | Staff must pay attention not to inadvertently disclose the sexual orientation of any deaf BSL user while using BSL interpreters. |

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| Other  characteristic  See Note 7 | Potential  Positive Impact Y/N | Details of Expected Positive Impact | Potential Negative Impact Y/N | Details of Expected Negative Impact |
| Social deprivation | Y | Interpreters or other support will be financed by appropriate funding schemes. | Y | It has been highlighted to the College that if students / staff wish to participate in private professional courses or non-learning activities, the person will need to pay for the interpreter themselves. Financial impact will need to be taken into consideration before making recommendations of extracurricular activities to BSL users. Deaf BSL users may require additional learning and financial support. |
| Care Experienced people | Y | Deaf students and employees of all backgrounds will be supported. | Y | Similar to the students or staff living in social deprivation, financial impact will need to be taken into consideration before making recommendations of extracurricular activities to BSL users. Deaf BSL users may require additional learning and financial support. |
| People with caring responsibilities | Y | Deaf students and employees with caring responsibilities will be supported. | Y | In an unexpected or unusual situation such as emergency, the College may experience difficulties in communicating with the BSL user and those they care for. Awareness of BSL interpreting support such as Contact Scotland may be useful. |
| Any other groups that need to be taken in consideration? |  | N/A |  | N/A |

**Step 4 – Acting on the results of the assessment.**

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| What actions can be taken or amendments made to policy to reduce the negative impact?  See note 8 | **Deaf Awareness Training** – offer different levels or types of deaf awareness training to staff depending on their roles within the colleges.  **Guidance for Teaching and Non-Teaching Staff** – develop a simple checklist of things that we can do to make deaf BSL users to feel more included in classes, activities or events.  **Celebrate Deaf and BSL Cultures** – promote the intersectionality of sign language cultures among different protected characteristics.  **Liaise with Edinburgh College Development Trust** – enable teaching staff to apply for interpreter costs to enable deaf BSL students to participate in extra-curricular activities.  **Additional adjustments for deaf individuals who are not BSL users** – provide reasonable adjustments for all people who are deaf or hard of hearing. |
| Is there a need to address any gaps in evidence? | Within the guidance for protected characteristics, Scottish Funding Council specifies to the College to record ‘Deafness or partial hearing’. Hence, we are unable to disaggregate the data of deaf students from those with partial hearing. |
| How will equality be advanced/ good relations be fostered? | This action plan will heighten the awareness of the needs of deaf BSL users. All students and staff are supported to work towards making the College a more inclusive place for deaf people. |
| Who has been involved in carrying out this assessment? | • BSL Plan Steering Group members  • Learning support staff  • Deaf students  • BSL teaching staff  • Access and Inclusion Strategy Group members |
| If you cannot fully review the impact now, what else must be done, by/with whom and why? | N/A |

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| **Recommended decision:** (place an x against relevant outcome)  See note 9 | Outcome 1: Proceed – no potential identified for discrimination or adverse impact, and all opportunities to promote equality have been taken | **X** |
| Outcome 2: Proceed with adjustments to remove barriers identified or to better promote equality |  |
| Outcome 3: Continue despite having identified some potential for adverse impact or missed opportunity to promote equality |  |
| Outcome 4: Stop and rethink as actual or potential unlawful discrimination has been identified |  |
| Any other recommendations? | | |
| A BSL version of this equality impact assessment may need to be available for those who request it. | | |

**Step 5: The monitoring and review stage**

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| **Plan actions to reduce negative impact, advance equality and monitor the impact of the policy, proposal or decision**   * Please indicate if there is any data which needs to be collected as part of action to be taken and how often it will be analysed. * Indicate how the person responsible will continue to involve relevant groups and communities in the implementation and monitoring of the policy, etc. * How will the impact of the policy/procedure/decision be monitored?   See Note 10 | | |
| **Action to be Taken:** | **Person Responsible:** | **Completion/Review Date:** |
| **Deaf Awareness Training** – offer different levels or types of deaf awareness training to staff depending on their roles within the colleges. | Organisational Development | Ongoing – to be reviewed annually. |
| **Guidance for Teaching and Non-Teaching Staff** – develop a simple checklist of things we can do to make deaf BSL users to feel more included in classes, activities or events. | EDI Lead | December 2024 |
| **Celebrate Deaf and BSL Cultures** – promote the intersectionality of sign language cultures among different protected characteristics. | Marketing and Communications | Ongoing – to be reviewed annually. |
| **Liaise with Edinburgh College Development Trust** – enable students to apply for interpreter costs for extra-curricular activities. | Curriculum staff | Ongoing – to be reviewed annually. |
| **Additional adjustments for deaf individuals who are not BSL users** – provide reasonable adjustments for all people who are deaf or hard of hearing. | EDI Lead  Facilities  Access Centre Manager | Ongoing – to be reviewed annually. |
| **Signature of Lead:**  Nina Munday **Date:** 11/03/2024 | | |

**Step 6 – Review and Publication**

See Note 11

Please send the completed EIA record to [equality@edinburghcollege.ac.uk](mailto:equality@edinburghcollege.ac.uk) for

* review by Quality and Improvement;
* publication in whole or in part on the College website.

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| **Date of Review** | **15/03/2024** |
| **Date of Publication** |  |