



# **Equality Impact Assessment on the University's Policy for Physical Access and Egress for Disabled People**

## **Consultation Document**

**08 February 2011**



# Contents

## Executive Summary

	<b>Page</b>
<b>1. The University of Ulster</b>	<b>1</b>
<b>2. Section 75 Duties</b>	<b>3</b>
<b>3. The Policy for Physical Access and Egress for Disabled People</b>	<b>7</b>
<b>4. Consideration of Available Data and Research</b>	<b>9</b>
<b>5. Assessment of Impacts</b>	<b>16</b>
<b>6. Consideration of Measures to Mitigate any Adverse Impact</b>	<b>17</b>
<b>7. Consultation</b>	<b>18</b>



# **Executive Summary**

## **Introduction**

This Equality Impact Assessment (EQIA) has been carried out as a result of the University's initial policy screening exercise in 2002. The University of Ulster established an EQIA Sub-group in January 2010 to conduct this exercise.

## **The Policy**

The policy for Physical Access and Egress at the University of Ulster seeks to ensure that the University estate is universally accessible as this will provide equality of access and egress for all students, staff and visitors to the University. Therefore the policy aims to ensure:

- that best practice is incorporated into the design of any new buildings;
- the current provision for access and egress to existing buildings (including any planned refurbishment) complies with the legislative standards;
- that requests for reasonable physical adjustments will be dealt with in a way which complies with legislative standards; and
- the requirements of the Fire Regulations regarding the evacuation of disabled people are met.

## **Data Collection**

In conducting the EQIA, the Sub-group considered a wide range of data including existing quantitative and qualitative institutional data, data gathered from pre-consultation meetings and miscellaneous anecdotal data.

## **Summary of Assessment of Impacts**

The Sub-group found no evidence to suggest that the University's Policy for Physical Access and Egress for Disabled People adversely impacts on staff,

students or visitors on account of their disability. In contrast, it found that although the policy focuses on physical access for disabled people, it is more likely to have a positive impact on physical access (i.e. benefit) for all Section 75 categories of people (i.e. in general).<sup>1</sup>

## **Preliminary Recommendations**

Because the Sub-group found no evidence that the policy is likely to have adverse impact on disabled people (i.e. it was more likely to have a positive impact on physical access for all categories of people) it made no specific recommendations in terms of mitigating measures.

However, the following recommendations were made regarding the implementation and review of the policy:

- the provision of facilities not be diminished; and
- the feedback from the Pilot Pre-consultation on the Potential Equality Impacts of the Greater Belfast Development Project be presented to the appointed architects.

## **Consultation**

This consultation report has been made available as part of the formal consultation stage of the EQIA. The University welcomes any comments which you may have in terms of this EQIA, including the preliminary findings with regard to assessment of impacts and preliminary recommendations.

If you have any queries about this document, and its availability in alternative formats please contact Janine Smyth: Equality and Diversity Services on Tel:028 9036 8137 or e-mail: [j.smyth1@ulster.ac.uk](mailto:j.smyth1@ulster.ac.uk)

---

<sup>1</sup> The Sub-group has used the definition of differential and adverse impact included at paragraph 3.6 of the Equality Commission's Practical Guidance on Equality Impact Assessment: "Differential impact suggests that a particular group has been affected differently by the policy (either favourably or unfavourably), whilst adverse impact is an indication that the effect is less favourable (i.e. negative) and is potentially unlawful".

The Consultation Report and a response pro forma are available to download at <http://www.equality.ulster.ac.uk/consultation.html>

The consultation ends on **Monday 16 May 2011**.



## **Section 1 – The University of Ulster**

- 1 The University of Ulster was established by Royal Charter in 1984 and operates across four campuses: Coleraine, Jordanstown, Belfast and Magee. The governing body of the University is the Council.
- 2 The Vice-Chancellor is the Chief Accounting Officer of the University. Professor Richard Barnett is the Vice-Chancellor. The Vice-Chancellor is supported by four Pro-Vice-Chancellors.
- 3 The Pro-Vice-Chancellors are responsible for Teaching and Learning, Research and Innovation, Student Services and Sport, and Communication and External Affairs. Four Directors are responsible for the administrative functions of the University covering: Finance and Information, Human Resources, Physical Resources, and Corporate Planning and Governance. In addition, there are three Provosts, one with responsibility for the Coleraine campus; one for the Magee campus; and one for the Jordanstown and Belfast campuses. The Provost of Magee and Provost of Jordanstown and Belfast also currently hold two of the four Pro-Vice-Chancellor positions.
- 4 The University is academically organised within six faculties<sup>2</sup> and each faculty is headed by a Dean. The above staff comprise the Senior Officers of the University.

### **The University Vision and Mission**

- 5 The University of Ulster's Vision is to be a University with a national and international reputation for excellence, innovation and regional engagement. The University makes a major contribution to the economic, social and cultural advancement of Northern Ireland as a

---

<sup>2</sup> The six faculties are Arts; Art, Design and the Built Environment; Computing and Engineering; Life and Health Sciences; Social Sciences and the Ulster Business School.

region within a national and international context and plays a key role in attracting inward investment. Core business activities are teaching and learning, research and technology transfer and academic enterprise.

## **Section 2 - Section 75 Duties**

6 Section 75 of the Northern Ireland Act 1998 requires the University of Ulster in carrying out its functions, relating to Northern Ireland, to have due regard to the need to promote equality of opportunity:

- Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Between men and women generally;
- Between persons with a disability and person without; and
- Between persons with dependants and persons without.

7 In addition, and without prejudice to its obligation above, the University must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

### **Policy Screening**

8 In 2001 the University was designated by the Secretary of State as a public authority, for the purposes of Section 75 of the Northern Ireland Act 1998. Subsequently the University produced its Equality Scheme, which was approved by the Equality Commission in July 2002, and then proceeded to screen all its policies to assess:

- whether there was any evidence of higher or lower participation or uptake by different groups;
- whether there is any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy;
- whether there was an opportunity to promote equality of opportunity or good relations better by altering the policy or working with others in government or the wider community; and
- whether consultations with relevant groups, organisations or individuals indicated that the policy creates problems which are specific to them.

- 9 As a result of this screening exercise it was agreed that a full EQIA should be carried out on the policy for Physical Access and Egress for Disabled People. The decision to 'screen in' this policy was unique. It was made because the University recognised that not **all** of its buildings, facilities and environments (i.e. its estate) are fully physically accessible to disabled people. However, it also acknowledged the considerable progress that has been made to make the estate more accessible. This is evidenced in the University's existing Access Audit. Therefore it knew that disabled people were **likely** to be adversely affected in terms of access to, and within certain parts of its estate (i.e. they do not have equal access) and that there was an opportunity to better promote equality of opportunity by reviewing and developing its existing policy.
- 10 The EQIA was originally scheduled for 2006, but was postponed to 2010 to allow the update to the University's Access Audit to take place. Since the schedule of EQIAs was agreed in 2002 the University has committed considerable resources to improving access into and throughout its estate.

### **The EQIA Process**

- 11 The University established an EQIA Sub-group to conduct the exercise. The Sub-group is chaired by Professor Greg Lloyd, Head of the School of the Built Environment, and is made up of representatives from Physical Resources, Student Support, the Students' Union, Student Accommodation, Sport and Recreation, the School of the Built Environment, Corporate Communication, the School of Health Sciences, the University's Fire Safety Officer and Equality and Diversity Services. Work commenced on the EQIA in January 2010.
- 12 The Sub-group has carried out this Equality Impact Assessment to consider:

- Differential and adverse impact upon disabled people;
- Where adverse impact is identified, to assess measures which might mitigate the adverse impact; and
- The potential for alternative action(s), which might better achieve the promotion of equality of opportunity and good relations.

### **Stakeholders**

- 13 The main stakeholders who are affected by this policy are disabled students, staff and visitors to the University.

### **Relevant Legislation**

- 14 In the operation of this policy the following legislation is also relevant:
- The Disability Discrimination Act (1995)(as amended);
  - The Special Educational and Disability (NI) Order 2005 (SEND0);
  - The Disability Discrimination (NI) Order 2006 (The ‘disability duties’);
  - Section 75 of the Northern Ireland Act (1998);
  - Health and Safety at Work (NI) Order 1978 (as amended);
  - Workplace (Health, Safety and Welfare)Regulations (NI);
  - Management of Health and Safety at Work Regulations 1992 (as amended);
  - The Fire and Rescue Services (Northern Ireland) Order 2006;
  - The Fire Safety Regulations (Northern Ireland) 2009 (currently in draft);
  - Building Regulations:
    - The Building Regulations (Northern Ireland) 2000 (as amended)
    - Technical Booklet Part R: 2006 “Access to and use of Buildings”;
    - Technical Booklet Part H: 2006 “Stairs ramps, guarding and protection from impact;
    - Technical Booklet Part E: 2005 “Fire Safety”;
    - Technical Booklet Part V: 2000 “Glazing”.

- 15 The University will also be guided by the following:
- British Standards:
    - BS 8300: 2009;
    - BS 9999: 2008;
  - Departmental Guidance to the Fire Regulations:
    - Practical Fire Safety Guidance – The Evacuation of Disabled People from Buildings : DHSSPSNI : 2009;
  - Statutory planning considerations:
    - PPS 3: Access, Movement and Parking;
    - PPS 3 (Clarification): Access, Movement and Parking;
    - Supporting Design Concept Statements; and
  - Code of practice for the assurance of academic quality and standards in higher education – Section 3: Students with Disabilities.

### **Associated policies**

- 16 The Policy for Physical Access and Egress for Disabled People is associated with the following University policies:
- Equal Opportunities Policy;
  - Estates Strategy;
  - Procurement Policy; and
  - Health and Safety Policy and Manual.
- 17 A clear physical access policy will also assist the University in achieving its widening participation objectives.

## **Section 3 – The Policy for Physical Access and Egress for Disabled People**

### **Background**

- 18 The University commits an average of £18m each year in respect of capital works. All capital schemes are required to comply with a range of legislative requirements including health and safety and disability issues. In addition, since 2000 the University spent over £6m in respect of ‘DDA works<sup>3</sup>’ and continues to spend considerable sums annually to address access issues or the particular needs of individual disabled students or staff. These are known as ‘In Year’ requirements.
- 19 In Year requirements are reported either to Disability Services (students) or Equality and Diversity Services (staff and visitors), who, in turn, liaise with Physical Resources to ensure that, where possible and reasonable, these are added to their programme of works and actioned.
- 20 Where staff or students require assistance to evacuate a building during an emergency, individual Personal Emergency Evacuation Plans (PEEPs) are drawn up by the University’s Fire Officer, in conjunction with Disability Services, Equality and Diversity Services and Physical Resources Departments.
- 21 Whilst the University has always scheduled the refurbishment and upgrading of buildings to comply with (evolving) disability legislation and building regulations, this EQIA is unique because the University does not currently have a formal (written) policy regarding physical access for disabled people. Therefore, as part of this EQIA, the University intends to formalise and consult on its draft ‘Policy for Physical Access and Egress for Disabled People’. This formal policy will be finalised following this consultation.

---

<sup>3</sup> ‘DDA works’ are works carried out in response to the Disability Discrimination Act 1995 (as amended).

## Policy aims

- 22 The policy for Physical Access and Egress at the University of Ulster seeks to ensure that the University estate is universally accessible as this will provide equality of access and egress for all students, staff and visitors to the University. The University will undertake to remove any physical barriers to access and egress, or where this is not possible, to find a reasonable alternative method of providing the service/facility in question so as to facilitate this intended equality. This policy takes into account the fact that the University already has in place established procedures for responding to requests for reasonable adjustments and will continue to implement these.
- 23 The Policy for Physical Access and Egress takes into account the changing nature and time frames associated with the University of Ulster's strategic development plan. Therefore the policy aims to ensure:
- that best practice is incorporated into the design of any new buildings;
  - the current provision for access and egress to existing buildings (including any planned refurbishment) complies with the legislative standards;
  - that requests for reasonable physical adjustments will be dealt with in a way which complies with legislative standards, and
  - the requirements of the Fire Regulations regarding the evacuation of disabled people are met.

## **Section 4 - Consideration of Available Data and Research**

24 In conducting the EQIA, the Sub-group considered a range of data from the following sources:

- the University's updated Access Audit 2009/10;
- monitoring data on University of Ulster staff and students;
- anecdotal data on visitors attending corporate, sporting and cultural events, conferences and open days; and
- data collected as a result of pre-consultation on the potential impacts of the Greater Belfast Development Project.

### **Access Audit**

25 These data form the most comprehensive set. The University funded a fixed term post in 2009 for the purpose of updating the University's Access audit. The audit was successfully completed in June 2010, and provides an extensive record of areas of the University's Estate where physical access could be improved. It also includes a number of recommendations which are essentially management issues.

26 Physical access improvements within the following areas were prioritised within the audit according to their potential to have an immediate positive impact, to address Health and Safety issues and to reduce vulnerability to litigation:

- external approaches (including car parks);
- vertical access;
- internal and external door adaption;
- induction loops and related items;
- accessible toilets;
- signage;
- communication; and
- general / miscellaneous.

- 27 These recommendations assisted the University to develop a prioritised programme of works to improve physical access, to align with the University's Estate Strategy.
- 28 The programme of works is available on request from the Director of Physical Resources.

### **The University's Equal Opportunities Monitoring Data from the Staff and Student Records Systems**

- 29 Monitoring information for staff and students is gathered through the University's own monitoring forms. For the purpose of this EQIA, the University reviewed staff monitoring information on 1 September 2010, and student monitoring data for 2009/10. The statistical analysis of these data focussed primarily on disability (including all disabilities), but also examined multiple identities (for example disabled older staff), for each campus.

#### **Staff data**

- 30 The EO data were reviewed in terms of the University's general profile and by disability (i.e. in terms of multiple identities) for each campus. Whilst the general EO data indicated that 3.5% (115) of staff were known to be disabled, only two categories of staff exhibited differences between the disabled and non-disabled profiles. These were gender and age (Tables 1 and 2).

**Table 1**

<b>Gender</b>	<b>Known to have a Disability</b>	<b>Not Known to have a Disability</b>	<b>Total 01/09/10</b>
Male	61 (4%) (53%)	1456 (96%) (46%)	1517 (46%)
Female	54 (3.1%) (47%)	1716 (96.9%) (54%)	1770 (54%)
Total	115 (3.5%)	3172 (96.5%)	3287

31 As shown, there appears to be a higher incidence of disability amongst male staff at the University compared with female staff. Despite 46% of staff at the University being male, 53% of those who are known to be disabled are male. By contrast, 54% of staff are female, but only 47% of those who are known to be disabled are female.

**Table 2**

<b>Age Band</b>	<b>Known to have a Disability</b>	<b>Not Known to have a Disability</b>	<b>Total 01/09/10</b>
15-24	2 (1.5%) (1.7%)	128 (98.5%) (4%)	130 (4%)
25-34	16 (3.3%) (13.9%)	476 (96.7%) (15%)	492 (15%)
35-44	16 (1.8%) (13.9%)	876 (98.2%) (27.6%)	892 (27.1%)
45-54	44 (4.2%) (38.3%)	1004 (95.8%) (31.7%)	1048 (31.9%)
55-64	36 (5.1%) (31.3%)	666 (94.9%) (21%)	702 (21.3%)
65+	1 (4.3%) (0.9%)	22 (95.7%) (0.7%)	23 (0.7%)
Total	115	3172	3287

32 As shown, over 80% of staff at the University are over 35 years of age, with the proportion of staff 'known to have a disability' exceeding the proportion of those who are 'not known to have a disability' occurring for the 45-54, 55-64 and 65+ age bands. This highlights the relationship between age and disability (i.e. as age increases, the incidence of disability is likely to increase).

## Student data

33 The student EO data were reviewed in terms of the University's general profile and by disability (i.e. in terms of multiple identities). Whilst the general EO data indicated that 7.2% (1902) of students were known to be disabled, only one category of students exhibited differences between the disabled and non-disabled profiles. This was Ethnic Origin (Table 3).

**Table 3**

<b>Ethnic Origin</b>	<b>Known to have a Disability</b>	<b>Not Known to have a Disability</b>	<b>Total</b>
White	1800 (7.7%) (94.6%)	21640 (92.3%) (88.4%)	23440 (88.9%)
BME	36 (3.4%) (1.9%)	1031 (96.6%) (4.2%)	1067 (4.0%)
Not Known	66 (3.5%) (3.5%)	1798 (96.5%) (7.4%)	1864 (7.1%)
Total	1902 (7.2%)	24469 (92.8%)	26371

34 As shown, there appears to be a higher incidence of disability amongst White students compared with Black and Ethnic Minority (BME) students. Whilst 88.9% of students are White, 94.6% of those who are known to be disabled are White. By contrast, 4.0% of students are BME, but only 1.9% of those who are known to be disabled are BME.

## Visitors' data

35 The University does not currently monitor visitors attending corporate, sporting and cultural events, conferences and open days, in terms of equal opportunities. However, staff responsible for these areas do request that visitors inform them of any additional access requirements they may have before they visit the University, so that these can be accommodated in advance. Therefore they were able to identify that they probably receive fewer than 5 requests for reasonable adjustments each year, and have received no complaints from disabled visitors regarding physical access to date.

## Summary

36 The quantitative data provided a useful indicator of the incidence of disability at the University (i.e. the proportions and profiles of staff and students who are likely to have additional access requirements). However, it did not provide information about what these requirements are likely to be. Therefore the Sub-group agreed that it would also be useful to review the qualitative data collected as a results of the pre-consultation on the potential equality impacts of the Greater Belfast Development Project.

### **Qualitative Data collected as a result of pre-consultation on the potential equality impacts of the Greater Belfast Development Project**

37 This includes data collected as a result of a pre-consultation exercise on the potential equality impacts of the Greater Belfast Development Project, which was piloted with staff in the School of the Built Environment and the School of Nursing<sup>4</sup> in October 2010. These Schools were selected because of their gender profiles (i.e. to ensure equal numbers of males and females were invited to participate in the consultation exercise).

38 The aims of the pilot were:

- to assess the effectiveness of consultation early in the development project; and
- to assess the nature of any potential equality impacts that might result from (or exist during) the Greater Belfast Development Project so that any adverse impacts can be addressed/mitigated at an early stage.

---

<sup>4</sup> Due to the timing of the EQIA, pre-consultation was limited to a pilot involving 2 schools.

- 39 A total of 294 staff were invited to participate in the pilot pre-consultation exercise. However, only 15 members of staff responded to this invitation, resulting in a response rate of 5.1%. This was somewhat disappointing. Furthermore, only 7 staff provided comments within their response, 1 of which requested their comments remain confidential. Therefore the comments received cannot be considered representative of all staff.
- 40 As summary of the results follows:
- Only 1 member of staff thought that the expansion of the Belfast Campus (i.e. the Greater Belfast Development Project) is likely to create an equality of opportunity issues or good relations issues which was specific to them. However, this staff member requested their comment remains confidential;
  - No members of staff had any suggestions how the expansion of the Belfast campus could improve equality of opportunity and/or good relations for them. Alternatively, 1 member of staff suggested equality of opportunity and/or good relations could be improved for them if they weren't required to move to Belfast;
  - 5 members of staff provided suggestions how the expansion of the Belfast campus could encourage disabled people to participate more in University life. These included:
    - **making ingress and egress more equitable by removing existing barriers and the separate entrance for disabled users** ('The provision of disability access to the campus and the surrounding precincts in Belfast appears to be lacking. What effort has been made to ensure that ingress and egress to the university precincts is equitable for all users? The current use of barriers and separate disability access provision is a visible sign of segregation');
    - **consulting with disabled people at the design stage** ('Do not rely on architects to think about these things. Ensure that service users with disabilities are the key voice in planning decisions');

- **providing fully accessible accommodation** ('Fully accessible accommodation - unlike JN -'; 'Disability access in all areas must be facilitated'; 'Ensuring disabled access is available to all levels and areas');
- **providing adequate disabled parking** ('attention needs to be paid to disabled car parking arrangements given the likely inadequacy of public transport to the campus'; 'Provision of disabled parking close to the buildings'); and
- **Publicising facilities for disabled people** ('Promotion of facilities for disabled people');
- 4 members of staff provided suggestions how the expansion of the Belfast campus could better promote positive attitudes towards disabled people. These included:
  - **Staff training** ('Staff training');
  - **Increasing the numbers of disabled people on campus** ('Having more persons with disabilities present in the campus in itself is a good starting point. Also making UU facilities available to advocacy groups - a city centre location is preferable to a remote campus such as JN');
  - **Improving physical access for disabled people by using ramps instead of stairs** ('Ramp access between floors instead of stairs. This will take more space to deliver, but will provide ease of access for various users with differing motor skills, the use of lifts would then be an option for persons who feel that the ramps would be too difficult to traverse'); and
  - **Consulting with disabled people at the design stage** ('Do not rely on architects to think about these things. Ensure that service users with disabilities are the key voice in planning decisions').

41 Having considered these results, the Greater Belfast Development Steering Group has agreed to ensure that the feedback received during the pre-consultation exercise is presented to the appointed architects for the Greater Belfast Development.

## **Section 5 – Assessment of Impacts**

### **Assessment Based on Data and Information Available**

- 42 The Sub-group found no evidence to suggest that the University's Policy for Physical Access and Egress for Disabled People adversely impacts on staff, students or visitors on account of their disability. In contrast, it found that although the policy focuses on physical access for disabled people, it is more likely to have a positive impact on physical access (i.e. benefit) for all Section 75 categories of people (i.e. in general).

## **Section 6 - Consideration of Measures Which Might Mitigate Any Adverse Impact, And Alternative Policies Which Might Better Achieve the Promotion of Equality**

- 43 Because the Sub-group found no evidence that the policy is likely to have adverse impact on disabled people (i.e. it was more likely to have a positive impact on physical access for all categories of people) it made no specific recommendations in terms of mitigating measures.
- 44 However, the following recommendations were made regarding the implementation and review of the policy:
- the provision of facilities not be diminished; and
  - the feedback from the Pilot Pre-consultation on the Potential Equality Impacts of the Greater Belfast Development Project be presented to the appointed architects.

## Section 7 - Consultation

45 In accordance with its Equality Scheme and the requirements of Section 75, The University now wishes to consult on this EQIA. It is our intention that the consultation should be appropriately focused and that all those affected parties are given an opportunity to respond to the consultation. Accordingly it will consult by the following means:

- the University's standard Section 75 consultee list will be updated to include relevant additional stakeholders;
- consultees will be notified of the consultation exercise by letter (hard copies of the document will then be sent on request);
- the consultation will be advertised in local newspapers;
- an all-staff and all-student email will be posted to advise of the consultation exercise;
- notice of the consultation exercise will be posted on the Equality Unit's web pages; and
- representatives of the EQIA sub-group will try to meet with interested parties on request.

46 The consultation period will start on Tuesday 08 February 2011 and will close on 16 May 2011. The consultation document and response form are available to download at:

[www.equality.ulster.ac.uk/consultation.html](http://www.equality.ulster.ac.uk/consultation.html)

If you require the consultation document in an alternative format please contact Equality and Diversity Services on 028 990368137 or email Janine Smyth at: [j.smyth1@ulster.ac.uk](mailto:j.smyth1@ulster.ac.uk)

47 Responses to the consultation exercise should be sent to:

Ms Sara Hunter  
Head of Equality and Diversity Services  
University of Ulster  
Shore Road  
Newtownabbey  
BT37 0QB

Or to: [sp.hunter@ulster.ac.uk](mailto:sp.hunter@ulster.ac.uk) **by 16 May 2011.**

48 The outcome of this Equality Impact Assessment will be posted on the University website: [www.equality.ulster.ac.uk/consultation.html](http://www.equality.ulster.ac.uk/consultation.html)