EQUALITY IMPACT ASSESSMENT (EqIA)

Summary results of the EqIA

Title of policy/ practice/ process/ service:

SLAB website

Is the policy new (proposed), a revision to an existing policy or a review of current policy?

The EqIA is to assess the accessibility of the SLAB website and ensure it is compliant with the World Wide Web Consortium (W3C) international Web standard Web Content Accessibility Guidelines (WCAG) v2.1 Level AA. This a requirement of the Public Sector Bodies Accessibility Regulations 2018.

We did user accessibility testing and received a report on the findings with recommendations for changes to existing content. The report included several areas identified as not complying with WCAG Level AA. Action has been taken to resolve issues identified. The EqIA also considers the accessibility software ReachDeck currently used on the website and whether it is an appropriate tool that meets user accessibility needs.

Key findings from this assessment (or reason why an EqIA is not required):

- age, race and disability are the only characteristics where there is a limited potential impact:
    - age - the potential impact of applicants over 65 having less access to and be infrequent users of the internet has to be considered
    - race - most obvious potential issue is barrier posed to applicants from not having English as a first language
    - disability - disability arises as a potential issue as visual impairments and other disabilities may prevent equal access to communications.
- website structure and improved website content will influence our communications with these groups of people
- any impact will be positive.

Summary of actions taken because of this assessment:

We continue working on improving our website and making it as accessible and usable as possible. We use ReachDeck accessibility software, which assists in making adjustments to the website, which helps the reader to navigate through our website.

To proactively monitor website accessibility, we have Silktide set up on the site. Silktide is a website testing and reporting tool, which provides automated website accessibility testing (for desktop and mobile devices) and quality assurance. We have scheduled regular accessibility reviews of the website and accessibility statement.

Ongoing actions beyond implementation include:
Regular review of website to check compliance with accessibility legislation, as well as seeking regular feedback on any issues that may arise.

Lead person(s) for this assessment (job title and department only):
Media and Communications Manager, Strategic Development Directorate

Senior responsible owner agreement that the policy has been fully assessed against the needs of the general duty (job title only):
Director of Strategic Development

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V0.1	14/07/2021	Initial draft for discussion and review by equality officer
V0.2	16/09/2022	Draft for review by equality officer
V0.3	05/10/2022	Further Draft for review by equality officer
V0.4	06/10/2022	Draft for review by SRO
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Step 1 – Framing the planned change

Discussing step 1 and step 2 with the Corporate Policy Officer (Equalities) at an early stage will help identify appropriate evidence. This may include support from the wider Policy and Development team.

1.1 Briefly describe the aims, objectives and purpose of the policy/ practice/ process/ service.

The purpose of our website is to provide information about the legal aid system in Scotland for legal aid providers, members of the public receiving or interested in receiving legal assistance, and advice agencies. Our objective is to maintain an easily accessible website presence with a high standard of content and functionality, which is appropriate for our audiences.

SLAB's evidence underpinning the development of outcomes identified a specific focus on disability as part of our programme of work - "Outcome 2: Minority ethnic people and disabled people experience equal access to quality accessible services and information about legal aid."

1.2 Why is the change required?

This is a review of the SLAB website to ensure it meets W3C standards and to enable more people to access our information. The design and style is intended to improve the accessibility of the website for vulnerable people, for example, with visual or hearing impairments, or learning disabilities. Further, simplifying the language used will make the content more accessible to people generally, and for those where English is not their first language. These changes will help more people understand and appreciate our role and function.

The website contains relevant information which helps ensure that people are treated equally, such as information relating to disabled access.

1.3 Who is affected by this policy/ practice/ process/ service?

The service affects members of all our audience groups:
- legal professionals
- legal aid applicants
- members of the public

- justice sector partners
- advice sector
- SLAB staff

1.4 Policy/ practice/ process/ service implementation date

Policy review.

1.5 What other SLAB policies or projects may be linked to or affected by changes to this policy/ practice/ process/ service?

Related policies and strategies are the Corporate Plan and Communications Strategy. Any changes made to the SLAB website could affect our satellite websites for the PDSO, CLAO and our Legal Aid Policy and Decision-makers' Guidance.

Step 2: Consider the available evidence and data relevant to your policy/ practice/ process/ service

The information you gather in this section will:

- help you to understand the importance of your policy/practice/process/service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

2.1 What information is available about the experience of each equality group in relation to this policy/ practice/ process/ service? Stay focused on the topic and scope of your policy/ practice/ process/ service. Does the policy/ practice/ process/ service relate to an area where there are already known inequalities? Refer to the EqIA guidance for sources of evidence.

Remember, this step in the EqIA process is **NOT** about the impact your policy has on equality groups and what we need to do to mitigate those. That assessment is done under Step 4.

Note: If you proceed to a full EqIA you should continue to add to this section as you develop the policy/ practice/ process/ service, come across new evidence and/ or **undertake a consultation.**

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Age	Older people and reading	Older adults use a different reading strategy from younger adults as they rely more on holistic cues to the identity of words, such as word shape: so unfamiliar words and phrases may be harder to quickly decipher accurately.
	Reading age	The average reading age in Scotland is 11 years. Written communication below this threshold will not be well understood by the majority of the public.
	OFCOM Online nation report 2019 + 2018 research into access and inclusion	Older adults are much less likely to have a smartphone or internet access, but may have a landline. At the end of 2021, 94% of UK homes had internet access, up from 89% in 2019. But the pandemic has created a bigger divide. 6% of households don't have home internet access, and 14% of adults access the internet only infrequently.

Older people are less likely to have home internet access (18% of over-64s do not have access), but so too are those in lower socio-economic households (11%). People who rely on a mobile phone for internet access might struggle to work or learn from home or complete online forms – this represents 10% of all adults, and 18% of adults in lower socio-economic households. |

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Disability	1) Scottish Census 2011 (Table QS304SC)	The 2011 Scottish Census has 19% of people declaring a disability or limiting illness. Within that data, 2.37% of people are blind or have partial sight loss, while 2.5% have a learning disability or difficulty. (1)
	2) Criminal Applicant Survey – Research Briefing and Topline Results	SLAB's applicant surveys show that 54% of applicants for criminal legal aid (2) had a disability or limiting condition. For civil legal aid, 52% of respondents had a disability or limiting condition, 24% described it as a mental health problem and 25% as reduced physical capacity. (3) For the profession in general (including paralegals), at least 4.8% of the profession has a disability, such as blindness, deafness or a mobility impairment. (4)
	3) SLAB's applicant surveys	
	4) Law Society of Scotland Diversity data	Feedback will be sought on a regular basis from stakeholders in relation to this equality group.
	5) Scottish Health Survey	The Scottish Health Survey 2018 states 32% of Scottish Adults have a long term mental or physical health condition or disability (5).
	6) Scottish Government See Hear report	Hearing loss: There are estimated to be around 850,000 people with hearing loss in Scotland, one in six of the population, and of those, 70% are over 70. It is projected that this figure will increase by 50% in the next 20 years (6).
	7) Deafblind Scotland	Sight loss: Significant sight loss affects over 180,000 people in Scotland, one in 30 of the population, and it is predicted that this figure will double by 2031. The vast

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	8) Dyslexia prevalence; severe dyslexia prevalence; dyslexia simulation 9) OFCOM 2018 research into access and inclusion	majority are older people, with more than one in two people aged over 90 having a significant sight loss (6). Deafblind Scotland estimate that there are some 5,000 people who have significant hearing and sight loss, with most of those people being over 60 and having become dual sensory impaired as part of the ageing process (7). 10% of the Scottish population is thought to be dyslexic in some way. 4% may be severely dyslexic. (8) Disabled people are generally less likely than non-disabled people to personally use most communications services and devices. Overall, the largest disparities are found in smartphone ownership in households (where 53% of disabled people have a smartphone in their household compared to 81% non-disabled people) and in internet use (67% of disabled people use the internet compared to 92% of non-disabled people). Some of this can be explained by their general older demographic and lower socio-economic grouping; some is related to disability. The findings vary by disability, with visual impairments most likely to affect use of communication devices. (9)
Race	Census results	The main intersection between race and the website is in English language comprehension. The relevant results from the 2011 census are: "The proportion of the population aged 3 and over reported as not being able to speak English well or at all was 1.4% overall, and 11% for those born outside the UK. This

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	SCILT: Languages in Scotland	proportion generally increased with age of arrival into the UK: for those who arrived aged under 16 it was 5% while for those who arrived aged 65 and over it was 31%. The proportion of Scotland's population aged 3 and over who could speak, read and write English was 94%. This proportion was lowest for those born in the EU Accession countries (75%) or in the Middle East and Asia (89%)." The most commonly spoken languages in Scotland other than English are: Polish, Urdu, Scots, Punjabi and Arabic.
Sex **Gender Reassignment** **Sexual orientation** **Religion or Belief** **Pregnancy or maternity** **Marriage or civil partnership**	Trans mental health study; Stonewall survey of LGBT mental health; SLAB care experience literature review	The evidence for other protected characteristics does not highlight any impact on the ability of people to access the website effectively. However gender reassignment and sexual orientation are linked to higher levels of mental ill health. Being care experienced is linked to higher levels of mental ill health and poorer educational outcomes, as well as a greater likelihood of being involved in the criminal justice system or experiencing homelessness.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Care Experienced *(corporate parenting duty)*		

2.2 **Using the information above and your knowledge of the policy/ practice/ process/ service, summarise your overall assessment of how important and relevant the policy/ practice/ process/ service is likely to be for equality groups.**

2.3 **Outcome of step 2 and next steps. Complete the table below to inform the next stage of the EqIA process.** *Consult with the project group and/ or Corporate Policy Officer (Equalities) on completing this section.*

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality or our corporate parenting duties	N	Proceed to Step 5: agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all of the equality groups and/ or our corporate parenting duties	Y	Proceed to Step 3: complete full EqIA
It is unclear if there is relevance to some or all of the equality groups and/ or our corporate parenting duties	N	Proceed to Step 3: complete full EqIA

Step 3 – stakeholder involvement and consultation

This step will help you to address any gaps in evidence identified in Step 2. Speaking to people who will be affected by your policy/ practice/ process/ service can help clarify the impact it will have on different equality groups.

> **Remember that sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your policy/ practice/ process/ service on equality groups. An inadequate analysis in an assessment may mean failure to meet the general duty.**

The Policy and Development team can help to identify appropriate ways to engage with external groups or to undertake research to fill evidence gaps.

3.1   Do you/did you have any consultation or involvement planned for this policy/ practice/ process/ service?
Yes

3.2   List all the stakeholder groups that you will talk to about this policy/ practice/ process/ service.

We commissioned independent accessibility researchers User Vision to conduct usability testing with disabled people to evaluate the accessibility of the website with disabled people. The aim was to get feedback on the website's accessibility from members of the public who use their own assistive technology. The following three main user groups were identified to cover specific types of users:
- visual: blind screen reader users
- cognitive: people on the Autism spectrum disorder and people with Dyslexia
- physical: people with limited dexterity

Testing was done on mobile and tablets where users felt comfortable. This was done because of the additional requirements it places on the user as well as the accessibility issues with some assistive technology.

3.3   What did you learn from the consultation/ involvement? Remember to record relevant actions in the assessment action log.

Overall the participants were pleased with the site and praised many of the fundamental accessibility features on the site (such as the use of headings and structure), however there were issues raised by the participants. Some of the issues raised impacted on the website's accessibility and compliance with the Web Content Accessibility Guidelines v2.1 Level AA.

A recommendation was also made in relation to the continued inclusion of the accessibility software ReachDeck and opinion given on whether it is an appropriate tool that meets user accessibility needs.

The issues were classified as follows:

Rating	Definition
High severity problem (H)	Likely to cause a problem that would frequently prevent users from completing their tasks, with the potential to greatly frustrate them. Important to fix this problem soon.
Medium severity problem (M)	Likely to cause some temporary confusion that delays users from reaching their goals for a considerable amount of time (at least 30 seconds), along with some degree of irritation. Unlikely to prevent users from reaching their goals.
Low severity problem (L)	Cosmetic or minor problem that may cause users to hesitate or be distracted for a few seconds.
Observation (O)	An issue observed by the consultant that may not have caused participants specific difficulties during testing but does not reflect usability best practices and may have contributed to overall impressions of the site.
Positive finding (P)	An example of good practice which should be maintained.

The following lists the usability testing findings and any actions taken to address the issues raised:

Findings: New to legal aid

1. **Issue:** Pages should be findable in multiple ways through the site (H) - WCAG Multiple Ways 2.4.5 Level AA

The guide to legal advice and legal aid, can only be found from the navigation. It is best practice (and also a Web Content Accessibility Guideline) to enable users to find pages through different means. In this case there are no links to this page on the home page or on the new to legal aid, even though the breadcrumbs indicates it's in the new to legal aid section.

Recommendations: Provide in page links from the new to legal aid page to enable users to go to this page or remove this page completely.

Action taken: resolved
Link to the Scottish Government Guide to legal advice and legal aid added to the New to legal aid home page.

2. **Issue:** Provide the answers posed by the content (M)

When the users read the content, it was clear that the information was guiding them to consider all options (e.g. which ones are free and which ones are cheaper). However there was no clear signposting or information on what those options were.
The links to the Scottish Government site with guidance did not resolve this issue.

Recommendations: Review and improve the content so that the relevant information is contained on this page or there are appropriate links to this information.

Action taken: resolved

Content on the New to legal aid home page reviewed and amended to clearly signpost to the information contained in the Scottish Government Guide. The content on the SLAB website page that provides the link to the SG guide was reviewed and amended to include appropriate links to the information.

3. **Issue:** Keeping users on the site is best practice (M) - WCAG 1.3.1 Level A & 2.4.4 Level A

Although it is acceptable to signpost and take users off to other sites, best practice is to keep users on the site they are on. Where links take users off the site either through a new tab or new window, users must be informed (using text) in advance. In this instance SLAB should explain why they should go to the mygov.scot website (e.g. there is significantly more content that could help them.

Recommendations: Provide text based information (e.g. opens in a new window) when links take users off the site and explain why this is being done.

Action taken: resolved
Decision taken corporately for Scottish Government to host information for the public on mygov.scot, so it is necessary to direct website users to this central resource.
Text added to explain that all links in this section will take you to the external mygov.scot website.
An explanation has also been added to explain the purpose of mygov.scot and that the information is about all the options to be considered for legal advice not just legal aid.

4. **Issue:** Avoid using tables unless data needs to be displayed (H)

Where this was seen by users, the layout was not appreciated and the blind screen reader users actively registered their displeasure at it. One reason they did not like it was because of the repeated information. As there is an accessible (aria) label used which includes the format and size, screen reader users were forced to hear it again in the second and third columns.

Recommendations: Remove the table formatting, whilst keeping the format and size at the end of the link.

Action taken: resolved
Table formatting removed.

5. **Issue:** Design with user groups in mind WCAG 2.4.4 Level A (H)

The way the BSL videos have been implemented in both the design and code makes it difficult for BSL users to find them but also makes them difficult to understand for screen reader users as the labels are not distinguishable.

Recommendations: Redesign this section, removing the tables and instead have two sections: one for leaflets and the other for videos. All links need to be unique, purposeful and distinguishable on their own (eg "BSL video with subtitles" link is not easy to distinguish from another "BSL video with subtitles".

Action taken: resolved
Tables have been removed. Two separate sections formed – downloadable information and BSL videos. Titles and links are unique and describe content.

Findings: Eligibility estimators

1. **Issue:** User Progressive Disclosure to help users (H)

Having all the questions of the eligibility estimator calculator on one page means that users aren't necessarily given the most relevant information for their situation or will see form fields in that not related to them. This relates to all of them but the task focused on the civil legal aid estimator.

Whilst it is a simple form, because of the amount of text with each field and being displayed on one page, it can appear quite daunting. Breaking up the questionnaire would make it more manageable in terms of appearance of the length and amount of content.

Recommendations: Consider a complete redesign creating a multi-step process, which is in line with best practice form design which guides people on the next steps based on their answers. This would also make the form looks smaller and less daunting, given the amount of text that is contained within it.

Action taken: recommendation not taken
The form is complicated but so too is the legal aid calculation, which is also circular in nature. You can be declined on the grounds of capital and/or income and/or expenditure. We portray it as steps, but it's often more convoluted than that in the background. We will continue to monitor and review layouts and labels in line with our aim of making continual improvements.

2. **Issue:** Guide users clearly (H)

The way the estimators are presented creates two issues for users:
    1. The difference between advice and assistance
    2. Which estimator to use as two were related to civil cases.
Users could not distinguish between advice and assistance and legal aid. One user stated that they were the same thing and therefore more distinction is required.
Secondly, many users were not sure which estimator to use as the advice and assistance estimator and civil legal aid both related to civil cases. Some users expected to go through both of them and would go for the advice and assistance one first.

Recommendations: Revise the content so there is clear information (on the SLAB website) that states the difference between advice and assistance and legal aid.
Revise the designs and content so it is clear which estimator a user should use for their circumstance.
Consider creating a help tool that will guide users to the right tool for them.

Action taken: resolved

Content revised to provide clear information on the difference between A&A and legal aid.

The link to each of the three estimators now sits with the revised information on each type of legal assistance to help in choosing the appropriate estimator for the type of help needed.

Subject to receiving feedback on the clarity of the revised content and design we will review and consider whether a help tool would provide additional benefits.

3. **Issue:** Fully consider the user journey regardless of outcome (M)

As the estimator form was on one page, the design has to imply that users won't automatically qualify for legal aid and the content has also been created that way. This means that when users were asked what they would do next if they did automatically qualify they responded to say they weren't sure what do to.

As a result of a lack of clear next steps, one user went back to the estimators' page and started the advice and assistance journey only to be told they wouldn't qualify – becoming very confusing.

Recommendations: In the first instance create content and a Call to Action (CTA) that enables users who auto qualify to go to the next steps.

However redesigning the form with progressive disclosure would mean that users who auto qualify do not have to engage with the remaining sections and can continue on their journey would be better.

Action taken: resolved

Where someone's provided circumstances enable the estimator to show they may automatically qualify the content has been revised to provide 'Next steps' information.

4. **Issue:** Make help more context sensitive (M)

Many users had questions about the form fields and most struggled to get answers unless they found the help/information button which was located after the form fields.

When the help/information button was used, it contained help information about a number of questions (e.g. net annual income, annual allowances etc.) rather than being context sensitive and being about one item. Some struggled with this because of the amount of content and some information such as (annual allowances) wasn't included in the help section.

Recommendations: To begin with, move the help buttons to be above the form fields in that section.
Longer term, redesign the help functionality to be tooltips (or other design) located next to the form field and contain information about that form only so that there is context sensitive help.

Action taken: resolved
Help buttons repositioned to be above the form fields. The longer term addition of tooltips will be explored.

5. **Issue: Only present form fields that are relevant for the user (M)**

During the testing, all of the participants did not understand what the annual allowance edit field was or why it was not editable.
After further investigation we understood it to be related to the number of dependents but there is no information on the site that states this. Given the testing involved a scenario with no dependents this form field was not needed and only served to confuse users.

Recommendations: Remove this from view that unless users select one or more dependents earlier in the process and then explain that it is calculated automatically based on the number of dependents.

Action taken: resolved
Explanation given that the 'annual allowance' field is calculated depending on information entered about dependants. Removing the field unless there are dependents will be reviewed as part of any technical improvements but the initial text change removes any lack of clarity to the field's purpose and source of the allowance calculation.

6. **Issue:** When information on the page updates, these need to be accessible to screen readers WCAG 1.3.1 Level A & 4.1.3 Level AA (H)

It is important that content on the page is accessible to all disabled users. Often dynamic content or page updates are not communicated to screen readers and therefore blind people miss important information on the page. Within the estimator page, when the annual allowances or total disposable income form fields are updated these are not communicate to screen reader.
In addition the result, displayed under step 5 is not announced either.

Recommendations: Implement aria-live regions, set to polite so that updates are captured by screen readers.

Action taken: In discussion with web developer about aria-live regions for dynamic content.

Findings: Find a solicitor

The usability testing raised a number of issues with the Solicitor Finder, including one that involved WCAG compliance.

Following the testing the web developer redesigned the tool to address the issues. While not every recommendation was taken this wasn't at the expense of accessibility. We also reviewed content where issues were raised.

Findings: Contact us

The usability testing raised a number of issues with the Contact us page, including ease of finding information and provision of multiple contact numbers.

Following the testing we redesigned the page, including to provide the recommended drop-down menu for presenting the relevant information. The multiple phone numbers required during Covid were removed with the roll-out of the new Teams-based phone system to simplify contact details.

Finding: ReachDeck

The usability testers said ReachDeck was not used and most participants did not understand what it was for.

There was also a strange interaction for the screen readers where the focus would suddenly jump to ReachDeck. This caused significant frustration for those users. The blind users explained that it was not relevant to them as they were more familiar with their own assistive technology (and needed to use that to get to this site).

One user suggested that having a feature to read the content out would be useful but did not connect that with ReachDeck and had a negative reaction when they first interacted with it as they didn't know what it was doing or what it was for.

Overlays and in page accessibility tools like this are not well received within the accessibility community and serious consideration should be given to retaining it.

Recommendations: Review the stats on usage with a view to ending the contract of ReachDeck on the site. The cost of the subscription could be reinvested into other accessible solutions that would enhance the experience for all.

Our web developer separately raised the issue of BrowsAloud's usefulness and his previous negative experience of in page accessibility tools.

Action: ReachDeck contract has been renewed but in light of the feedback the recommendation to replace it with other accessible solutions should be pursued.

Step 4 - Impact on equality groups and steps to address these

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- **Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010?** How will this be mitigated?

- **Is there potential to advance equality of opportunity between people who share a characteristic and those who do not?** How can this be achieved?

- **Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not?** How can this be achieved?

4.1   Does the policy/ practice/ process/ service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?

In the tables below, record the impact of the policy/ practice/ process/ service, as it is planned or as it operates, might have on each equality characteristic and describe what changes in policy/ practice/ process/ service or actions will be required to mitigate that impact. Copy any actions across to the project action log.

Age	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impact	Negative impact	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination	X			Our website makes information and materials about legal aid and the organisation more accessible to a wider audience. It does by being designed so you should be able to listen to most of the website using a screen reader, zoom in up to 300% without the text spilling off the screen, information for applicants is available in the form of BSL videos featuring audio description and sub-titles and the current accessibility software has functions including a picture definition dictionary, MP3 generator, screen mask, text enlarger and page simplifier. If information on this website is needed in a different format we can make this available, including accessible PDF, large print, easy read, audio recording or braille.

				We aim to have content that is in Plain English. When it's necessary to use technical terms we will try and explain their meaning in Plain English. We are aware that specifically older age groups are less likely to own a smartphone and/or have access to the internet and would therefore not be able to access our website. Those who cannot access our website, due to not having access to the internet, are able to reach us through other channels, such as by letter, the telephone or in person, to receive more information.
potential for developing good relations	X			We're positively promoting to everyone that that uses the site that: • Age: others may need the adaptation tools
potential to advance equality of opportunity	X			We're removing barriers that would make the site inaccessible so equalising the opportunities for those accessing site (Age/Race/Disability).

Sex	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impacts	Negative impacts	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination			X	There is no evidence to suggest that access to our website differs significantly between male and females.
potential for developing good relations				

potential to advance equality of opportunity				

Disability	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impacts	Negative impacts	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination	X			The range of readers and assistive devices associated with online activity helps ensure that access to our website is widely available. The website has been designed so you should be able to: • listen to the website using a screen reader • zoom in up to 300% without the text spilling off the screen. We have information for applicants in the form of BSL videos featuring audio description and sub-titles. The current accessibility software we use on the website, ReachDeck, has functions including a screen reader, picture definition dictionary, MP3 generator, screen mask, text enlarger and page simplifier. If information on this website is needed in a different format we can make this available, including accessible PDF, large print, easy read, audio recording or braille.
potential for developing good relations	X			We're positively promoting to everyone that that uses the site that: • Disability: others may need the adaptation tools

potential to advance equality of opportunity				

Gender Reassignment	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impacts	Negative impacts	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination			X	
potential for developing good relations				
potential to advance equality of opportunity				

Race	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impacts	Negative impacts	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination	X			The use of Plain English in our written communications (both online and in print) will help those whose first language is not English. The ReachDeck accessibility software tool offers assistance by reading our website and linked documents in other languages.

| potential for developing good relations | X | | | We're positively promoting to everyone that that uses the site that:
• Race: others may need different languages |
| potential to advance equality of opportunity | | | | |

Religion or Belief	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impacts	Negative impacts	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination			X	
potential for developing good relations				
potential to advance equality of opportunity				

Sexual Orientation	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impacts	Negative impacts	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination			X	

potential for developing good relations				
potential to advance equality of opportunity				

Pregnancy & Maternity	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impacts	Negative impacts	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination			X	
potential for developing good relations				
potential to advance equality of opportunity				

Marriage & Civil Partnership	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take.
	Positive impacts	Negative impacts	No impact	E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
potential for discrimination			X	

potential for developing good relations				
potential to advance equality of opportunity				

Care experienced young people	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	**Negative impacts**	**No impact**	
potential for discrimination			X	
potential for developing good relations				
potential to advance equality of opportunity				

4.2   Describe how the assessment so far might affect other areas of this policy/ practice/ process/ service **and/ or project timeline?**

Examples of the items you should consider here include, but are not limited to:

- **Procurement criteria**: does you assessment indicate you should include equality as part of the technical specification for any current, or future, procurement process?

- **Communication plan/ products**: do you need to communicate with people affected by this policy/ practice/ service/ process in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach people (e.g. representative organisations, the Law Society of Scotland)? This might apply to public information, leaflets, or targeted promotion of a change to particular customer groups.

- **Cost**: do you propose any actions because of this assessment which will incur additional cost?

- **Resources**: do the actions you propose require additional or specialist resource to deliver them?

- **Timing**: will you need to build more time into the project plan to undertake research, consultat or to complete any actions identified in this assessment?

4.3 **Having considered the potential or actual impacts of your policy/ practice/ process/ service on equality groups, you should now record the outcome of this assessment below**. Choose from one of the following (mark with an X or delete as appropriate):

Please select (X)	Implications for the policy/ practice/ process/ service
	No major change Your assessment demonstrates that the policy/ practice/ process/ service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.
X	**Adjust the policy/ practice/ process/ service**

You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy/ practice/ process/ service when implemented.

We are always working to make our website as accessible and usable as possible. For example, visitors to the website can use the ReachDeck accessibility software to:
•   change colours, contrast levels and fonts
•   zoom in up to 400% without the text spilling off the screen
•   navigate most of the website using just a keyboard
•   navigate most of the website using speech recognition software
•   listen to most of the website using a screen reader (including the most recent versions of JAWS, NVDA and VoiceOver)
We have also tried to make the website text easy to understand.

To proactively monitor website accessibility, we have Silktide set up on the site. Silktide is a website testing and reporting tool, which provides automated website accessibility testing (for desktop and mobile devices) and quality assurance.
We have scheduled regular accessibility reviews of the website and accessibility statement.
The issues identified in the Digital Accessibility Centre report (above) have been resolved actively.
The redevelopment work has, at every stage of the process, included user testing with people with a range of accessibility needs.

Continue the policy/ practice/ process/ service with adverse impact
The policy/ practice/ process/ service will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.

	Stop and remove the policy/ practice/ process/ service
	The policy/ practice/ process/ service will not be implemented due to adverse effects that are not justified and cannot be mitigated.

Step 5 - Discuss and review the assessment with decision makers and governance structures

You **must** discuss the findings of this assessment with senior decision makers during the lifetime of the project/ review and before you finalise the assessment. Relevant groups include, but are not limited to, a Project Board, Executive Team or Board members. EqIA should be on every project board agenda therefore only note dates where key decisions have been made (e.g. draft EqIA sign off, discussion about consultation response).

5.1   Record details of the groups you report to about this policy/ practice/ process/ service and impact assessment.
Include t**he date you presented progress** to each group and an **extract from the minutes** to reflect the discussion.

During the lifetime of the website redevelopment work streams were active with all relevant stakeholders and decision-makers within the organisation to ensure their requirements for the website were met. As the redevelopment progressed there was constant involvement with these groups to check progress and ensure their needs were being met.

Prior to launch we carried out a planned programme asking for input and feedback from different user groups, ranging from operational and direct services staff, solicitors and interested user groups. The latter group included organisations such as the Lanarkshire Community Law Centre, Citizens Advice, CHAP (housing, welfare & debt) charity, Castlemilk Law Centre and the Community Help & Advice Initiative (CHAI). Responses were favourable and didn't highlight any issues that impacted on accessibility.

Step 6 – Post-implementation actions and monitoring impact

There may be further actions or changes planned after the policy/ practice/ process/ service is implemented and this assessment is signed off. It is important to continue to monitor the impact of your policy/ practice/ process/ service on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

6.1   Record any ongoing actions below.   This can be copied from the project action log or elsewhere in this assessment and should include timescales and person/ team responsible. If there are no outstanding items please make this clear.

6.2   Note here how you intend to monitor the impact of this policy/ practice/ process/ service on equality groups. In the table below you should:
- list the relevant measures,
- Identify who or which team is responsible for implementing or monitoring any changes
- Where the measure will be reported to ensure any issues can be acted on as appropriate.

Measure	Lead department/ individual	Reporting (where/ frequency)
Regular review of website to check compliance with accessibility legislation.	Communications	Include in Comms update to Executive Team/every 4-6 months
Issues around conflict between accessibility took ReachDeck and individuals' screen readers. Review usefulness of ReachDeck on the site and compare with other accessible solutions.	Communications	Report to director. Due 16/3/23
Spreadsheet showing ownership of content for website to be reviewed and periodic requests sent for checks to be made to ensure content up to date and accessible.	Communications	Internal/rolling review

Review estimators: seek feedback on the clarity of revised content and design to consider whether a help tool would provide additional benefits.	Communications	Internal. Due 16/3/23
Estimators: explore viability of aria-live regions so that updates to in-page information are captured by screen readers Requires input from web developer about aria-live regions for dynamic content.	Communications	Internal. Due 16/3/23

6.3 **EqIA review date.** This EqIA should be reviewed as part of the post-implementation review of the policy/ practice/ process/ service. The date should not exceed three years from the policy/ practice/ process/ service implementation date.

29/01/2024

Step 7 – Assessment sign off and approval

All equality impact assessments must be signed off by the relevant Director or Senior Responsible Owner (SRO), even where an EqIA is not required, and be reviewed by the Director of Strategic Development for quality assurance purposes. The Chief Executive must approve all equality impact assessments. Note the relevant dates here:

Director/ SRO sign off: 15/12/2022

Chief Executive approval: 11/01/2023

All full equality impact assessments must be published on SLAB's website as early as possible after the decision is made to implement the policy, practice, process or service.