Equality Impact Assessment Template

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement and Guidance and Checklist Notes, and undertake our online training on Equality and Diversity and EqIA. These, along with further information and resources, are available at www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment

EqIA covers policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services, but will be referred to as 'policy/practice' hereinafter.

A. Policy/Practice (name or brief description): Principles and Purposes of Learning Analytics
B. Reason for Equality Impact Asessment (Mark **yes** against the applicable reason): • Proposed new policy/practice • Proposed change to an existing policy/practice • Undertaking a review of an existing policy/practice • Other (please state): **The Principles and Purposes is a new document setting out a broad conceptual framework for learning analytics activities. It does not represent a policy or practice as such, although it will guide the development of policy and practice.**
C. Person responsible for the policy area or practice: Name: Tom Ward Job title: Director of Academic Services School/service/unit: Academic Services
D. An Impact Assessment should be carried out if any if the following apply to the policy/practice, if it: • affects primary or high level functions of the University **Potential implications (see below)** • is relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' as set out in the Policy and Guidance)? **Potential implications (see below)** • It is one which interested parties could reasonably expect the University to have carried out an EqIA? **Potential implications (see below)**
E. Equality Groups To which equality groups is the policy/practice relevant and why? (add notes against the following applicable equality group/s) • Age

- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership[1]

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups:

- Any gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed:

- If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups:

- If the policy/practice contributes to advancing equality of opportunity[2]

- If there is an opportunity in applying this policy/practice to foster good relations:

- If the policy/practice create any barriers for any other groups?

- How the communication of the policy/practice is made accessible to all groups, if relevant?

- How equality groups or communities are involved in the development, review and/or monitoring of the policy or practice?

- Any potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations:

Equality Impact Assessments involve assessing the impact of policies and practices in terms of the University's requirements under the general equality duty set out in the Equality Act. The Principles and Purposes document is not a policy or practice – it provides a framework for the future development of policy and practice. It is therefore not possible or necessary to conduct a formal Equality Impact Assessment on the document. It will however be important for the University to undertake Equality Impact Assessments when appropriate when developing specific policies and practices associated with implementing elements of the document.

While it is not possible to conduct a formal Equality Impact Assessment on the document, it is possible to provide some broad reflections on the aspects of the document which may be more likely to have implications (whether positive or otherwise) for the University's delivery of the general equality duty. These broad reflections are set out below.

Learning Analytics has the potential ***to lead to direct or indirect discrimination, harassment, victimisation, or less favourable treatment for people with protected***

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[1] Note: only the duty to eliminate discrimination applies to marriage and civil partnership. There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect.

[2] This question does not apply to the protected characteristic of marriage or civil partnership

characteristics (age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation:

- *If the underlying data or the algorithms used for learning analytics contain bias, then, where learning analytics is used to predict academic success of individual students and to support individual interventions, these interventions could favour some groups over others.*

- *If the underlying data or the algorithms used for learning analytics contain bias, then, where learning analytics is used by institutional managers to explore the effectiveness of different types of student support services, this could lead them to design services that do not meet the needs of all student groups.*

Potential mitigating actions:

- *Recognise (including in the Principles document) that data and algorithms can contain and perpetuate bias, and work to build awareness of this and address it where it occurs.*

- *Develop strong institutional governance arrangements for learning analytics to avoid inappropriate and unethical use of learning analytics (with strong governance being particularly important when using data on students' personal characteristics).*

- *Develop capacity of staff to interpret data and to recognise the potential for data and algorithms to contain bias.*

- *Ensure that learning analytics does not inform significant action at an individual level without human intervention.*

There is also potential for learning analytics to advance equality of opportunity:

- *Learning analytics approaches can allow us to see more nuanced views of our highly diverse student population, challenge assumptions that we may be making, and allow supportive resource to be directed where it is most needed.*

- *Learning analytics can also support a more personalised learning experience, which may assist the University to support non-traditional learners.*

- *Learning Analytics can also have a positive impact in addressing equality issues by identifying biases in institutions' services and activities.*

- *Learning Analytics can assist institutions to teach at scale while treating students equitably.*

F. Equality Impact Assessment Outcome

Select one of the four options below to indicate how the development/review of the policy/practice will be progressed and state the rationale for the decision

Option 1: No change required – the assessment is that the policy/practice is/will be robust.

Option 2: Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.

Option 3: Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified. **Yes** **Option 4:** Stop the policy or practice as there are adverse effects cannot be prevented/mitigated/or justified.
G. Action and Monitoring 1. Specify the actions required for implementing findings of this EqIA and how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above). **No specific actions required in relation to the Principles and Purposes document, beyond the arrangements already planned for communicating and implementing the document. It will however be important to identify appropriate actions where EqIAs have been undertaken for specific learning analytics developments.** 2. When will the policy/practice next be reviewed? **2019-20**
H. Publication of EqIA Can this EqIA be published in full, now? **Yes**/No If No – please specify when it may be published or indicate restrictions that apply:
I. Sign-off EqIA undertaken by (name(s) and job title(s)): **Tom Ward** Accepted by (name): **Tom Ward (with oversight from Prof Dragan Gasevic and Prof Sian Bayne)** Date: 16 May 2017

Retain a copy of this form for your own records and send a copy to
equalitydiversity@ed.ac.uk