



## Equality Impact Assessment Guidance and Template

This form is intended to help you decide whether an Equality Impact Assessment (EqIA) is needed and, if it is, to carry out the assessment of impact.

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement 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](http://www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment)

EqIA is part of the University's general equality duty under the Equality Act 2010 and the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. The Equality Act 2010 specifies the following 'protected characteristics': age, disability, race (including ethnicity and nationality), religion or belief, sex, sexual orientation, gender reassignment, pregnancy and maternity, and marriage or civil partnership. This form uses 'equality group' to mean persons who share a relevant protected characteristic.

The University has a general equality duty to have due regard to the **needs** to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people who share a relevant protected characteristic and people who do not share it.

Under the Scottish Regulations, the University has a specific duty – subject to relevance and proportionality - to assess the impact of applying proposed new or revised policies and practices against the needs above. 'Policy and practice' should be interpreted widely to include the full range of the University's policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services – essentially everything we do.

This form is a tool to help with screening and EqIA and is designed to lead you through the process through asking pertinent questions and giving examples. However, the law does not dictate a particular form for EqIA. The requirement is to actively consider how a policy or practice will meet the general equality duty, and take any necessary action. Wherever practicable, EqIA should be built into standard processes and tailored to the nature of the policies or practices involved.

It is, however, necessary to publish EqIA where the policy or practice is applied, so all EqIAs – in whatever format - should be sent to [equalitydiversity@ed.ac.uk](mailto:equalitydiversity@ed.ac.uk) for publication.

The form includes: some details about the policy/practice; a screening analysis to indicate whether full EqIA is required; and then a number of questions to enable full EqIA.

Answers should be recorded after the questions and the form can be expanded and supplemented as required. Answers may be as long or short as is necessary and relevant, bearing in mind that the effort involved in EqIA should be proportionate to the relevance of the policy or practice to equality.

Once completed, this form will be the record of the screening and, where applicable, the EqIA of the policy or practice. All full EqIAs are published.

<p>A. Policy or Practice (name or brief description):</p> <p>Practice: Piloting Adaptive Learning through CogBooks as route to exploring personalised feedback for students in real time and new pedagogies that can be applied to online learning and teaching.</p>
<p>B. Reason for screening (delete as applicable):</p> <ul style="list-style-type: none"><li>• Proposed new policy/practice</li></ul>
<p>C. Person responsible for the policy area or practice:</p> <p>Name: Mark Wetton</p> <p>Job title: Head of Technology Enhanced Learning</p> <p>School/service/unit: IS Learning Teaching and Web Services Division</p>
<p>D. Screening Analysis</p> <ol style="list-style-type: none"><li>1. Does the policy or practice affect primary or high level functions of the University? Yes</li><li>2. Is the policy or practice relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' set out in the introduction above)? Yes</li><li>3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? Yes</li></ol> <p>If the answer to any of these questions is 'Yes', an EqIA should be carried out on the proposed/revised policy or practice at an early stage and in any event before it is finalised.</p>
<p>E. Screening outcome</p> <p>Equality Impact Assessment required: YES</p> <p>Record notes about the screening process or outcome here.</p> <ul style="list-style-type: none"><li>• The EqIA has been drafted and informed at the planning stages of the implementation of Adaptive Learning via CogBooks. It has and will be updated as the project develops. IS Technology Enhanced Learning Services have completed the EqIA The CogBooks Adaptive Pilot will be delivered for one semester (starting January 2015) in one School, Geosciences, and will support two courses partially, i.e. 20 lectures in duration for 100 students. We will then review the EqIA in summer 2015 as part of evaluating the project</li></ul>
<p>F. Sign-off</p> <p>Screening undertaken by: Sue Woodger</p> <p>Accepted by (name): Mark Wetton</p> <p>Date: 18/9/14</p>

If EqIA is not being carried out, delete the remainder of this form and send the completed form to [equalitydiversity@ed.ac.uk](mailto:equalitydiversity@ed.ac.uk).

## G. Equality Impact Assessment

Before assessing the policy/practice, ensure that you have a clear understanding of the purpose of the policy or practice, the context, the intended beneficiaries and the results aimed for.

In answering the questions below:

- Bear in mind that the extent of EqIA should be proportionate to the relevance of the policy/practice to equality. It may not be practicable or necessary to answer every question or address every potential scenario.
- Focus mainly on aspects of the policy/practice that are most relevant to the question, to ensure most attention is given to the most important areas.
- Relate answers to consideration of the available evidence and address any gaps or disparities revealed, where feasible without disproportionate effort. For new policies, assess potential impact.
- Describe any action identified to address any issues highlighted.
- Where there is potential for adverse impact, but the policy/practice will still be applied, indicate the rationale for that decision.

Initial/partial EqIA: in some circumstances - particularly for new policies/practices – there may be limited information on which to base EqIA. In these cases, the EqIA should be carried out to the extent possible and should identify arrangements for monitoring/investigation of equality impact and for fuller EqIA in future.

Wholly positive impact: Some policies/practices may be viewed as having only positive equality impact. For these, consideration should still be given to ensure that no adverse impact is overlooked and to ensure that full advantage is taken of the positive impact, e.g. through effective communication. However, the effort involved in carrying out EqIA should not be excessive.

1. Overview. Indicate the current status of the policy/practice or the stage of development/review. Also note any general comments here regarding the relevance and significance of the policy/practice to equality. Which aspects of the policy/practice are particularly relevant (which should be the main focus for EqIA)? On what aspects of equality do the policy/practice particularly impact?

CogBooks software and services provide the University with an opportunity to pilot Adaptive Learning and assess such an approach in terms of its benefit to student learning and experience. Much of the focus for our students is in providing them with a unique and personalised learning experience. This is why we have been exploring Adaptive Learning, which has already gained prominence and traction within the US for its ability to deliver an online learning experience where the student is able to supplement traditional teaching with online tutoring and real time feedback.

The tool is accessed via a web browser and contains a mapping of the course content that is presented to the student via secure authentication. Once in the system, the student is able to navigate through course nodes and answer test/quiz questions, which can be revisited multiple times. Depending on the response provided the system offers the student further

underpinning information and content to help support learning outcomes and mastery of aspects of the subject. The student can track progress throughout, and academic staff can track cohort progress and take measures to re-enforce and help where students are struggling.

**Possible benefits:**

- Personalised learning experience
- Flexible building of degree module
- Portable study profile
- Mobile study
- Formative support for on campus coursework
- Ability to gain rapid feedback
- Future alignment to Massive Open Online Courses (MOOCS) possible. Ohio State University has implemented a high level adaptive component to good effect with their Calculus MOOC course (MOOCulus).

In addition for the University of Edinburgh the use of a mature Adaptive Learning platform enables exploration of new or revised approaches to teaching and learning.

The University propose to pilot and research the benefits of Adaptive Learning during the coming academic session (starting January 2015), after which a formal review will be scheduled to decide whether the University has achieved the benefits and success criteria that allow us to move to a full procurement for future use. The main protected characteristics potentially impacted are disability (as the online system will need to be accessible) and race (as the system will only be provided in English, the main teaching language of the University).

Throughout the pilot process the above pedagogy enhancements could help support all users and may provide positive benefit to disabled users or those with caring responsibilities, or for whom English is not their first language, as they will be able to work at their own pace and gain supplementary support from staff and fellow students as a consequence of engaging with the learning platform.

2. To which equality groups is the policy/practice relevant? Policies/practices applying to substantial groups of students or staff will be relevant to all equality groups, which should be noted. However, also indicate any equality groups for which the policy/practice is particularly relevant, and why.

The protected characteristics under the Equality Act are (delete any that are not relevant):

- Age
- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership<sup>1</sup>

In answering the questions below consider each of these equality groups. As part of this, consider diversity within, as well as between groups (e.g. different disabilities, different racial groups). Consider the implications of combinations of protected characteristics e.g.

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<sup>1</sup> 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.

issues of relevance to women may vary once race, religion and age are taken into consideration. Also consider the impact on those with caring/family responsibilities (which tends to impact more on women).

The pilot of CogBooks is available to 4 teaching staff and 100 students at the University and therefore it has the potential to be relevant to all groups. It is particularly relevant to some disabled users, who will require the system to be accessible especially where they rely on assistive technology. Also, as CogBooks is only available in the English language,. However as main teaching language of the University is English, there should be no expectation for the system to be available in alternative languages.

The CogBooks pilot may however be positive for those with protected characteristics, as it will allow students to revisit online materials multiple times on demand, which may assist students for whom English is not their first language. Flexible access to resources, that students can access at any time and place; may be a potential benefit to carers (statistically more likely female) and disabled users who may find studying at a particular time and location most helpful.

3. What evidence is available about the needs of relevant equality groups? E.g. information/feedback from equality groups or other stakeholders, involvement or research with equality groups or individuals, equality monitoring data, service monitoring data, information for other similar policies/practices, staff surveys, research reports, demographic information, audit, inspection or management reports and recommendations.

Where are the gaps in evidence? If there is insufficient information to properly assess the policy, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the policy/practice. Note: the resources put into collecting evidence should be proportionate to the relevance of the policy/practice to equality.

The Information Services Disability Information Officer (IS DIO) has completed a detailed accessibility review of the CogBooks service and will continue to participate to support planned accessibility improvements on an ongoing basis, many of which have already been put in place. As we are at the pilot stage we did not feel it was proportionate to run focused groups with representatives of all protected characteristics groups at this stage, but if the system is rolled out further then this will be considered as the EqIA is updated. Of the courses involved 6 students in total are registered with the University Student Disability Service, and may require reasonable adjustments. At this stage we feel there are no gaps in evidence that would prevent us from proceeding.

4. Might the application of this policy/practice lead to discrimination, harassment or victimisation? Might it result in less favourable treatment for particular equality groups or give rise to indirect discrimination?

We do not expect the planned practice to lead any forms of prohibited conduct, but will continue to monitor impact on all protected characteristics throughout the project.

5. Are reasonable adjustments built in where they may be needed?

All communication about the new system will be available in alternative formats upon request.

If a disabled user is unable to access and operate the system and we are unable to make it accessible, we would provide supplementary staff support and if need be, a student helper as a reasonable adjustment to ensure the student isn't disadvantaged. The University will bear

the cost for this and the student will not be asked to pay.

6. Does the policy/practice contribute to advancing equality of opportunity<sup>2</sup>? Will it help to:
- remove or minimise disadvantage
  - meet the needs of different equality groups
  - encourage increased participation of particular groups
  - take account of disabled people's impairments?

The practice will provide students with a personalised learning environment, which due to the nature of students being able to learn at their own pace and review materials for revisions, particularly benefit those for whom English is not a first language or who have specific learning difficulties. The practice will aim to maximise accessibility to ensure the system is as accessible to disabled users as possible and maintain a relationship with the supplier throughout in order to take a continual improvements approach to accessibility. Already the supplier has ring fenced a development budget for this purpose. This should take account of disabled peoples impairments and help meet the needs of different equality groups.

7. Is there an opportunity in applying this policy/practice to foster good relations between people in any protected group and those who are not<sup>3</sup>? Will it help to tackle prejudice and/or promote understanding?

This process has the potential of highlighting to schools (in this case of the pilot Geoscience) the need to ensure that reasonable adjustments are in place for disabled users when there is a requirement to use a specific system or method. This may help to improve other services and facilities schools offer by increasing awareness of these issues and improve the Schools literacy in this area. It will also demonstrate the Universities commitment to Equality and Diversity issues and the need to ensure systems are accessible to disabled users.

8. Is there evidence (or an expectation) that people from different equality groups have different needs or experiences in relation to the policy/practice? If so, what are they?

Disabled users will rightly expect the system to be accessible in line with current Guidance (WCAG version 2) and compatible with accessible technology, which is why we have commissioned and acted upon a full accessibility report of the system. As English is the main teaching language of the University we would not expect there to be any expectation that the system is available in any other language than English.

CogBooks have specifically designed their interface to be rich and visually appealing in order to cater to users with a wide range of learning styles. Adaptive learning by its nature intends to support varied learning styles with machine intelligence feedback. This approach is likely to support and include users in a number of equality groups.

Is there evidence (or an expectation) of higher or lower uptake by any equality group(s)? If so, give details of the differences and the reasons for these (if known)?

No, it is a required component of taking the degree, whilst other students can take these courses as options. We don't expect the use of CogBooks to impact enrolment on the course.

9. Is any equality group excluded from participating in or accessing the service or functions? If so, why?

As the system is only available in the English language, non-English speakers will be excluded. However, as users of this system will be enrolled on courses at a university where

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<sup>2</sup> This question does not apply to the protected characteristic of marriage or civil partnership

<sup>3</sup> This question does not apply to the protected characteristic of marriage or civil partnership.

English is the teaching language this should not create any disadvantage.

10. Does the policy/practice create any barriers for any other groups? For example, because of the time when the service is delivered or because of restricted income? Is the communication of the policy/practice accessible to all groups?

The University provides free 24-hour access to computing facilities for all students so there should not be any disadvantage to users, on the basis of income, caused by IT-based systems. If any reasonable adjustments are required for disabled users the cost of this will be born by the University and not the student. We do not envisage any other barriers.

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

The Information Services Disability Information Officer has reviewed the accessibility of the system and is supporting the project team to ensure the system meets current guidelines. In addition all feedback will be monitored and acted upon to the best of business ability, to ensure there is no negative impact on any protected characteristics and to note any positive impact.

12. Are there any other points to note regarding the potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations? If so, note these here.

The information we provide to users and schools will be available in a variety of formats upon request.

#### **H. Equality Impact Assessment Outcome**

There is a legal obligation to take account of the results of the EqIA in the development of a new or revised policy or practice. This requires considering taking action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and exploiting any potential for positive impact. Clearly any unlawful discrimination must be eliminated.

Having considered the answers in section G, select one of the four options below to indicate how the development/review of the policy/practice will be progressed. Delete the options that do not apply.

Option 1: No change required – the assessment is that the policy/practice is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review.

#### **I Action and Monitoring**

1. Specify the actions required to implement the findings of this EqIA.
  - a. Provide specific accessibility guidance from within CogBooks
  - b. Work with partners and CogBooks to ensure ongoing accessibility improvements
  - c. Ensure all information about the new system is available in alternative formats upon request and is advertised as such.
  - d. Ensure that the school is alerted to the need for reasonable adjustments if required.

2. State how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).

The project team and Information Services Helpline will monitor all feedback on the upgrade from users on an on-going basis to ensure no negative impact on any of the 9 protected characteristics and to note any positive impact. As required; work will be ongoing to improve the accessibility of the system for disabled users.

3. When will the policy/practice next be reviewed?

The EqIA will next be updated in August 2015 as part of the review of the pilot project. If the CogBooks service is extended or if equivalent software is procured in future years, the practice will be revisited.

#### **J. Publication of EqIA**

EqIAs are published on the Equality and Diversity website.

There is a statutory requirement to publish EqIAs within a reasonable period. However, in some circumstances there may be valid reasons to limit what is published or to delay publication.

Can this EqIA be published in full, now? Yes

#### **J. Sign-off**

EqIA undertaken by (name(s) and job title(s)): Sue Woodger, IS Project Manager

Accepted by (name): Mark Wetton

[This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]

Date:04/12/14

Retain a copy of this form for your own records and send a copy to [equalitydiversity@ed.ac.uk](mailto:equalitydiversity@ed.ac.uk)