



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):

Distance Learning at Scale (DLAS)

DLAS is the expansion of the University's already successful online learning portfolio which is tasked with reaching a wider group of students.

The University is increasing its commitment to open educational resources and widening educational opportunities with the option for prospective students to experience online learning without committing to a full degree, while also providing those that are seeking more traditional education the ability to study a full Master's online.

There are four aspects to the strategy behind Distance Learning at Scale: A new online pedagogy rooted in our strengths in high quality, research-led teaching; the building of a scalable capability and capacity; the cross fertilisation of courses and the University's Digital Education Ecosystem.

Distance Learning at Scale (DLAS) is seen as core University business. The DLAS Pilot will focus on research and development and is aimed at building, testing and proving the University and its partners' capability and capacity to plan, create and execute online learning at scale without compromising quality. To achieve this, this programme will deliver new pedagogy, underpinning innovative technologies, new University processes, an "at scale" partner relationship and new course creation with the capabilities to scale production. This will include a new programme business model and approach that structures clearly how each programme will be supported allocating staff academic time, administrative work and the leveraging of central shared services such as media, course development, IT, marketing and pedagogical support. The pilot will first create and then test the capabilities through the delivery of pilot academic programmes.

The end goal is to have a proven, scalable, reusable and quality University capability so that additional schools can leverage this capability for their own courses.

A robust governance and approval path both for the project, its strategic links and implications as well as the individual business cases and courses is being established for approval through the University Executive and other relevant University Committees.

B. Reason for Equality Impact Assessment (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):~~

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The institution currently delivers online credited content via different platforms however this is the first time we will be creating the capability for delivering micro-accreditation (called a 'MicroMasters' by edx, which is at the same academic level but smaller than an Online Master's Degree. A University of Edinburgh MicroMasters is typically worth 30 credits and is made up of a number of MOOC-sized modules and a capstone assessment module) and Masters via the edx.org platform.

Please note that 3rd party tools that are used within the courses will be reviewed for accessibility and will have their own EqlAs.

C. Person responsible for the policy area or practice:

Name: **Stuart Nicol**

Job title: **Acting Head of Educational Design and Engagement**

School/service/unit: **Information Services – Learning, Teaching and Web Services**

D. An Impact Assessment should be carried out if any of the following apply to the policy/practice, if it:

- affects primary or high level functions of the University
 - **Yes**
- is relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' as set out in the Policy and Guidance)?
 - **Yes**
- It is one which interested parties could reasonably expect the University to have carried out an EqlA?
 - **Yes**

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 partnership¹

Overview

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.

DLAS programme: the overarching business programme for building the University of Edinburgh's capability for delivering master's level online learning at scale and trialling these capabilities through pilot academic programmes.

DLAS will be delivering content primarily via the edx.org platform with content accessible globally and available to users both non-affiliated with the institution and UoE registered students.

Thus has the potential impact on a broad set of users and therefore to affect all protected characteristics however we feel that the protected characteristics of disability and race are the most likely to be impacted.

As part of the Quality Assurance agreement with the partner content will be checked by edX prior to being made available to ensure it meets edX Accessibility guidance:

<https://edx.readthedocs.io/projects/edx-partner-course-staff/en/latest/accessibility/index.html>

The protected characteristic of disability may be affected as this is an online system and it will need to be accessible and compatible with assistive technology such as voice recognition software, screen readers or screen magnification software and reasonable adjustments will need to be in place if for any reason a disabled staff or student was unable to use the system. Accessibility testing is conducted by edX when the course content has been completed to ensure it meets their standards plus University of Edinburgh instructional designers (who are tasked with the designing the courses and content) will check content meets the institutions accessibility policy and conduct inhouse testing of content.

Edx states it "At edX, we seek to understand and respect the unique needs and perspectives of the edX global community. We value every learner and are committed to be a leader in expanding access to all, including learners with disabilities. It is thus edX's commitment to ensure that our website, mobile applications, and platform are accessible to individuals with disabilities and that they permit content providers to develop and post accessible content". Edx does conform to WCAG 2.0 standards (<https://www.w3.org/TR/WCAG20/>), publishes its accessibility policy on the edX homepage (<http://www.edx.org>) and provides guidance on creating accessible content. Edx are currently working towards WCAG 2.1 AA standards.

(<https://edx.readthedocs.org/projects/edx-partner-course-staff/en/latest/accessibility/index.html>).

Edx accessibility policy: <https://www.edx.org/accessibility>

We also have a University web accessibility policy which we feel will help guide staff on their requirements regarding accessibility when uploading course content as well as a set of published guidelines <https://www.ed.ac.uk/information-services/help-consultancy/accessibility>. Course content will be created in partnership by academics and instructional designers (based within DLAS) whom will be tasked with checking content meets accessibility requirements. Instructional designers who co-create and upload content into the platform (edx.org) will have access to accessibility guidance, tools (e.g. SensusAccess) and have attended the appropriate training.

In addition to the accessibility policy we also raise awareness for accessible content via consultation meetings with staff who will be developing content plus referring to the universities accessibility policy including how to create accessible content:

<https://www.ed.ac.uk/information-services/help-consultancy/accessibility/creating-materials>

We are legally required to provide access to disability support to both learners and students and share this responsibility with edX thus all learners who enrol within any

EdinburghX MicroMasters are entitled to accessibility support. We will advertise this within each course (which there could be multiple within a MicroMasters) via the welcome kit (which can be accessed via the course content) and the support tab (which will be accessible on every course page) . See below for example text submitted by Student Disability service (we will also need to refer to the edX accessibility policy): <https://www.edx.org/accessibility>

“If you require support for your learning due to a health condition, learning difference or disability please contact the Student Disability Service directly to discuss your needs. You can contact them by email: Disability.Service@ed.ac.uk or phone: 0131 650 6828 and can also find more information about the Service from their website: www.ed.ac.uk/student-disability-service

Race is a relevant characteristic in that the majority of the site is in English but English is the main teaching language of the University. The teaching language is advertised on the general information page prior to the user enrolling. Users have the option via the browser to translate the content however this will not be moderated or supported by the institution.

All content added must not discriminate against any of the protected characteristics. Any content that was found to discriminate against any of the protected characteristics would result in severe disciplinary action. The University vision is a continuing commitment to equality and diversity for both students and staff. The University has a single equality strategy to ensure that equality and diversity are guiding principles in our pursuit of academic excellence. The introduction of this strategy coincides with the implementation of the Equality Act 2010 and builds on its principle of integrating equality and diversity in policy and practice.

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups:
There will be the expectation the system complies with the recognised accessibility standards (edx currently meet Web Content Accessibility Guidelines 2.0 and are working towards 2.1 AA compliance) including compatibility with various forms of assistive technology. DLAS have also consulted with IS Student Disability Service and the IS Disability Information Officer to review the platform and advise on accessibility policy. The system is only available in English but as English is the main teaching language of the University and the platform, we do not envisage that this will cause any disadvantage. The teaching language is advertised on the general information page prior to the user enrolling.
- Any gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed:
Presently we feel that we have conducted a wide review and don't see any gaps however the equality groups and impact will be reviewed on an annual basis or sooner if a gap is identified.
- If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups:
We do not believe that the DLAS pilot will result in any form of prohibited content. We will ensure the content is as accessible and will also ensure reasonable adjustments are in place so that no disabled student or member of staff experiences less favourable treatment if they are unable to use the system. As discussed above polices are in place across the University to govern any content that is added plus we are in partnership with the platform provider

(edx.org) who deliver content for numerous institutions globally and have a vested interest in ensuring a non-discriminatory platform (to maintain and increase access levels in a competitive market place). The platform is hosted thus we are unable to make platform changes to meet the institutions requirements or resolve any platform issues however we can report any accessibility issues identified directly to the named contacts or via the support portal.

- If the policy/practice contributes to advancing equality of opportunity²
DLAS looks to enhance equality of opportunity by offering 24 hr access to course content that would not otherwise be available remotely or in other time zones. The service is actively used to support distance learners and provide them with the same quality of taught content as provided on campus. This can include people whom could not afford to travel to Edinburgh, are pregnant, on maternity or have dependence that prohibits attending traditional on-campus courses.
DLAS will provide the opportunity for anyone around the world to experience online education delivered by a top-ranking university and the opportunity to gain accreditation either via Micromasters or Masters qualification at the University of Edinburgh.
- If there is an opportunity in applying this policy/practice to foster good relations:
For learners and students on the platform their will be tools available (native and external) that will be used to foster a digital community (e.g. discussion boards, social media, online video sessions, peer reviewing assessments). These will be accessible and monitored by academics and teaching assistants who can engage with users enrolled on the course.
Students will have access to Equality and Diversity content within the institution which demonstrates the Universities commitment to equality of opportunity for all its staff and students and promotes a culture of inclusivity.
- If the policy/practice create any barriers for any other groups?
Presently we don't envision any barriers expect for the ones previously highlighted (which we are trying to mitigate via accessibility awareness and advertising the course language as English). Due to the cost of accessing content and gaining recognition of learning via a certificate (either from edx or the institution) there could be an impact on users who are economically unable to afford the cost of gaining recognition of learning via a certificate (either from edx or the institution) there could be an impact on users who are economically unable to afford the cost however edx can provide financial assistance . Also due to the content being fully online we would be impacting on anyone unable to access a mobile, desktop or laptop connected to the internet. Video content can be downloaded for offline viewing however content and assessments require an internet connection.
- How the communication of the policy/practice is made accessible to all groups, if relevant?
We are legally required to provide access to disability support to both learners and students thus all learners who enrol within any EdinburghX MicroMasters or Masters program are entitled to accessibility support. We will advertise this within each course (which there could be multiple within a MicroMasters) via the welcome kit (which can be accessed via the course content) and the support tab (which will be accessible on every course page) . See below for example text

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

submitted by Student Disability service (we will also need to refer to the edX accessibility policy): <https://www.edx.org/accessibility>
Edx will advertise MicroMasters and Masters via edx.org or emails. The platform has an overview section which will include information on the accessibility. Marketing emails sent via Edx advertising either a MicroMasters of Masters will contain links to the overview section within edx.org.
If a disabled user requires content in an alternative format we will provide this free of charge.

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

The Disability Information Officer, and the Student Disability Service were asked to comment on the EqIA. Users will be asked for feedback within the edx (e.g. via discussion board post) which will be monitored (for both positive and negative feedback) by teaching assistants and staff. Any negative feedback which impacts on any of the 9 protected characteristics would be acted upon immediately.

- 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:
We will continue to promote accessibility as being key to DLAS and will test all Content for accessibility. Testing will be done via Teaching Assistants and instructional designers This should demonstrate the seriousness by which Edinburgh University takes the issues of Equality and Diversity.

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. For the reasons stated above.

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).

The DLAS instructional designers (based within the LTW EDE Team) and DLAM service manager (Myles Blaney) will be responsible for the monitoring of the policy, they will have had the appropriate training, access to the EqIA and accessibility guidance.

- **3rd party tools will be reviewed for accessibility and will have their own EqIAs.**
- **Staff aware of alternative formats and the institutions accessibility policy**
- **Monitor feedback and act on any negative comments on the 9 protected characteristics and act accordingly**
- **Training and consultancy will be offered to staff creating content in a variety of locations and times**

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

The policy will be reviewed and the EqIA updated if we receive any feedback (both positive and/or negative) from users, key stakeholders in the project or the system related to the 9 protected characteristics or any subsequent change in the policy.

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)):**Myles Blaney, Senior Service Manager, Digital Learning Applications & Media - Information Services – Learning, Teaching and Web**

Accepted by (name): **Stuart Nicol, Acting Head of Educational Design and Engagement, Information Services – Learning, Teaching and Web Services**

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

Date: **September 2019**

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