



API Equality Impact Assessment

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): **Enterprise Application Programming Interface (Enterprise API's).**

Application Programming Interfaces are connectors which enable IT systems to access data or functions provided by other systems. The Enterprise API programme and associated projects will establish the API infrastructure, technology and roadmaps to assist developers with a unified method of creating and accessing API's. Further the project will develop new API's.

The aim of the projects are to provide a secure and consistent API framework for developers to facilitate easier API development, monitoring, automation and support, which in turn will lead to greater integration across university systems. It will also facilitate easier transmission of data to apps on mobile devices through the use of API's.

The users of such technology will be university staff only. The API landscape will consist of in-house API's designed for internal use only and separate third party API's that connect to third party systems and university cloud services i.e. TOPdesk and Learn.

Along with the API technology itself, there will be written user guidance on how to use the APIs and developer guidance on how to build the API. This guidance will be available in alternative formats upon request.

B. Reason for Equality Impact Assessment (Mark **yes against the applicable reason):**

- Proposed new policy/practice – YES
- ~~Proposed change to an existing policy/practice~~
- ~~Undertaking a review of an existing policy/practice~~
- ~~Other (please state):~~

C. Person responsible for the policy area or practice:

Name: Susan Cooke

Job title: Enterprise Data Services Team Manager

School/service/unit: Service Management, Information 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 EqIA? **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

Enterprise API Service has the potential to impact on all 9 protected characteristics as it is available to staff and third parties. We feel however, the characteristic of disability and race may be the most likely to be affected.

With regards to the protected characteristic of disability, the API written guidance for both users and developers will need to be accessible in terms of meeting current guidelines as stated by the Web Content Accessibility Guidelines Version 2AA standard including compatibility with assistive technology. The University has a web accessibility policy which is based on the Web Content Accessibility Guidelines Version 2AA standard. The guidance for developers in particular, has the ability to stress the importance of accessibility in the creation of API's. Further, should accessibility issues flag up in the creation of API's, this can be rectified through the written guidance given to developers.

With regard to race, the API framework and guidance which will be published for use by developers and users, will be in English. This is mitigated however, by the fact that English is the main teaching language of the University. Therefore, we do not envisage this having a negative impact.

One might be concerned about the heightened risk of problems related to data protection that inevitably arise from access to various potentially sensitive data sources through the use of an API, such as student or HR records. From an equality

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.

and diversity perspective, there is a pre-eminent need to protect potentially sensitive information related to protected characteristics. Such concerns are mitigated by the fact that the data accessed through the use of an API must first be authorised by dedicated Data Stewards. There is a data steward assigned to each data set i.e. student records and a user must be given authorisation from them before being able to access such information. Therefore, specialised “access layers” will be built for specific audiences. There is the potential for a positive impact if API’s are created which allow greater analysis of Equality and Diversity data in order that any potential areas which require addressing are quickly identified.

With Enterprise API’s making it easier to transmit data to an App, this will allow easier access for groups who require flexible working hours, such as those with disabilities, groups with certain religious beliefs which restricts the days they can work or those under the protected characteristic of pregnancy and maternity who may not be working normal office hours.

Add notes against the following applicable statements:

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

The Information Services Disability Officer has tested the technology in accordance with Web Content Accessibility Guidelines Version 2, including checking the system for compatibility with assistive technology and any areas for improvements have been noted and dealt with accordingly.

Previously, the use of API’s were ad hoc and was difficult for API’s to interact with other university systems if they were not build in a unified way. The purpose of Enterprise API Service and Infrastructure is to allow easier and consistent creations of API’s, particularly for university core systems, which will make it easier to transmit data and easier interaction. This will benefit all users across the university, including those relevant equality groups.

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

At this stage, we feel we have sufficient information to proceed.

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

We do not envisage that the Enterprise API projects will result in any form of prohibited conduct. Where disabled users are unable to access or use the API technology, where the changes are within our control, we will look to rectify this. Where this is not possible we will ensure reasonable adjustments are in place to address this. Examples include providing additional assistive technology to the user or provide one to one assistance.

There could be an expectation that the framework and technology should be translated into different languages. However, the Universities business is carried out in English. As this is the main teaching language of the university we do not believe this will lead to any disadvantage.

One might be concerned about the heightened risk of problems related to data protection that inevitably arise from access to various data sources through the use of an API. From an equality and diversity perspective, there is a pre-eminent need to protect potentially sensitive information related to protected characteristics. Such concerns are mitigated by the fact that the data accessed through the use of an API must first be authorised by dedicated Data Stewards. There is a data steward assigned to each data set i.e. student records and a user must be given authorisation from them before being able to access such information. Therefore, specialised “access layers” will be built for specific audiences. There is the potential for a positive impact if API’s are created which allow greater analysis of Equality and Diversity data in order that any potential areas which require addressing are quickly identified.

- If the policy/practice contributes to advancing equality of opportunity²

The API technology is designed to provide the university with a unified method of creating API’s. This in turn should make the use of such technology easier for all users which will help foster equality of opportunity for people wishing to access such technology. The development of a unified API framework across the university could make analysis of Equality and Diversity issues better as any areas of concern that are flagged can facilitate the API framework to take this into account for future use.

With Enterprise API’s making it easier to transmit data to an App, this will allow access for groups who require flexible working hours, such as those with disabilities, groups with certain religious beliefs which restricts the days they can work or those under the protected characteristic of pregnancy and maternity who may not be working normal office hours.

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

The Enterprise API project should create no disadvantage and by demonstrating the commitment Information Services and the University has to Equality and Diversity issues we will be able to foster good relations. The development of a unified API framework across the university could make analysis of Equality and Diversity issues better as any areas of concern that are flagged can facilitate the API framework to take this into account for future use.

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

The Enterprise API project should not create any barriers for any other groups as its core purpose is to improve API as a technology by making it streamlined and more efficient for all users. All University staff have free 24 hour access to IT facilities.

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

There is a wiki page for the Enterprise API project which is accessible to staff and 3rd party users upon request which outlines the project, its aims and time frames for

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

progression. The wiki page, as part of the university will adhere to a University Web Accessibility Policy which is based around the Web Content Accessibility Guidelines Version 2 AA standard. All communication about this new service will be available in alternative formats free of charge on request.

. <https://www.ed.ac.uk/about/website/accessibility/accessibility-policy>

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

The Information Services Disability Information Officer will continue to review the accessibility of the system for disabled users whenever there is any major change. In addition, all feedback will be monitored for any positive or negative impact on any of the 9 protected characteristics and acted on accordingly.

- 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:

Nothing further to what is mentioned above at this stage

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.

~~**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~~

~~**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).

All feedback will be monitored for any potential positive or negative impacts on any of the 9 protected characteristics.

Staff and other users will be made aware of the need to make reasonable adjustments where necessary and guidance will be issued on how to ensure API's are as accessible as possible.

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

Anytime the system goes through a significant upgrade/change i.e. a software upgrade or when we receive any positive or negative feedback related to any of the 9 protected characteristics.

H. Publication of EqIA

Can this EqIA be published in full, now? Yes

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)): Susan Cooke, Enterprise Data Services Team Manager, Service Management

Accepted by (name): Alex Carter, Head of Service Management, Applications Directorate, Information Services Group

Date: 07th June 2018

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