



THE UNIVERSITY of EDINBURGH

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):

Global Open Finance Centre of Excellence (GOFCoE) need secure hosting of, and managed access to, sensitive reports/dashboards (UK commerce and industry financial performance). Some of these reports/dashboards will be made available to 3rd parties, and others to members of GOFCoE and the wider University via a web-based system with limited-access to authorised users. Such a facility cannot currently be provided in Edinburgh International Data Facility.

This project will build a standalone service (GOFCoE Extranet Service) to host periodically updated outputs (initially static HTML reports as outputs from GOFCoE analytics processing), and provide secure access to those reports in a shorter timeframe than can be achieved within Edinburgh International Data Facility. The nature of the data held within the reports, whilst not individualised, may still be sensitive in nature and therefore user-controlled access with two step verification is a critical aspect of the system. The GOFCoE Extranet solution (which includes an intranet element), developed by the Data Technology section of the IT Infrastructure directorate within the UoE IS Group.

- Two entirely separate partitioned system instances:
 - one "intranet" for use exclusively by select internal staff at GOFCoE and the University of Edinburgh; and
 - one "extranet" to which in addition select external project partner staff (including data suppliers and UK/Scottish government staff) subject to authorisation will have access.

B. Reason for Equality Impact Asessment (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: **Damien McGarrigle**

Job title: **Chief Operating Officer**

School/service/unit: **Global Open Finance Centre of Excellence, Data-Driven Innovations**

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

The sites have the potential to impact all groups as the service will be available to authorised users across various organisations and sectors. However, we feel that the following protected characteristics: disability, race, age and sex are the most likely to be impacted.

The service is a web-based application available on desktop and mobile device for eligible users. Therefore, the protected characteristic of disability may have the greatest impact, as it will need to be accessible in line with the Web Content Accessibility Guidelines 2.1 AA standard, including being able to work with assistive technology. The University has a [Web Accessibility policy](#), which is based on this standard. Furthermore, the aforementioned assistive technology includes voice recognition software, screen readers or screen magnification software. Moreover, gaining access to the sites involves multi factor authentication (MFA), namely working in conjunction with another device. This verification method may prove difficult to use for users with impaired manual dexterity, as they may not be able to complete this process within a fixed time, or also for those with short-term memory impairments, due to having to remember a sequence of numbers / digits or those using assistive software. Reasonable adjustments will be put in place should a disabled staff member prove unable to use the system and we were unable to rectify.

Furthermore, there is also the potential for the system to impact on race. We are aware that some countries, including China and Russia, may block access to some authentication processes, though at this moment it is expected the service will be used by UK-based businesses due to the nature of GOFCoE at its early stage of development, as well as its vision and purpose of serving domestic stakeholders. If the scope of the service is to be expanded in the future, e.g. for businesses in certain countries in which the authentication service may be blocked, we shall ensure users from these countries will not be placed at a disadvantage by providing alternative authentication mechanisms. Otherwise, users are granted access based on whether they are relevant stakeholders to the service provider (e.g. affiliations, data partners,

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.

funders, government agencies), and no information related to the protected characteristics are taken into account, and therefore we believe there is no barrier or restriction applied based on any of the protected characteristics. If it became apparent that all processes were being blocked, then we would ensure users from these countries were not placed at a disadvantage by allowing them to complete the MFA process in another manner.

The sites are available to all appropriate users, whereby the MFA portion can be accessed 24 hours a day, 7 days a week, which may positively impact several of the protected characteristics. In particular, pregnancy and maternity, disability, those with caring responsibilities (which could be disproportionately women) and those who observe and adhere to specific times of religious observance, can all access accordingly.

The primary objective of the service is to enable better information sharing and allow the users to utilise the information for purposes, such as references in reports, they find suitable. Such information may contain statistics as well as processed data at different levels of aggregation/breakdown, e.g. different age groups, gender, etc. We believe this type of information is objective in its nature, we do not impose any subjective opinions on any of the output, and staff are offered training in unconscious bias. The information on age, sex etc is held in complete confidence in line with the Data Protection regulations

The University vision involves 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.

Add notes against the following applicable statements:

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

The authorised users will be able to directly contact GOFCoE with regards to any issue that might negatively or positively impact relevant equality groups. As the service is not open to public consumption, but only open to authorised parties who must sign the Information Sharing Agreement with GOFCoE and the University due to the confidential nature of the shared information. Each user will go through the onboarding process when first being introduced to the service, during which any opinion can be directly communicated to the GOFCoE team. We have consulted with the Staff Disability Network and the Information Services Disability Team to help identify potential impacts of GOFCoe on disabled users. We have and will continue to monitor all feedback for any comments positive or negative related to any of the nine protected characteristics and act accordingly.

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

We believe we have sufficient evidence to proceed. We will continue to monitor and collect feedback of any positive or negative effects and make appropriate changes accordingly. All users will be able to contact GOFCoE directly via either the email listed on the site or any member of the team who are engaged in the project.

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

We do not have any reason to believe that the secure reporting system created for internal and external stakeholders will lead to any form of prohibited conduct. Significantly, we will endeavour to make the system as accessible as possible. In terms of the possible effect on disabled users and the inability to access the service, particularly if we were also unable to rectify this issue, then reasonable adjustments would be put in place. This could include utilising access of the service through provision of assistive technology. All

of these measures, alongside any feedback received, positive or negative, on all nine protected characteristics will be kept under constant review.

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

The service may help advance equality of opportunity allowing users to access sensitive reports and databases, for example, 24 hours a day, 7 days a week, whether on or off campus. We hope that the sites would advance equality of opportunity by ensuring no member of staff is excluded from accessing this requisite information. As noted above, disabled users, those with caring responsibilities (which could be women disproportionately) and those who observe and adhere to specific times of religious observance, for example, can all access the sites either in a home or hybrid work setting. Moreover, the pilot may also help equality of opportunity across all nine protected characteristics by encouraging a secure digital environment and underline the University's Dignity and Respect Policy.

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

In completing this EqIA, we have identified the possible protected characteristics that may be affected, positively or negatively, by the implementation of the GOFCOE sites. We have considered ways to mitigate and provide support and information to users in these groups. Hopefully this demonstrates the commitment Data-Driven Innovations, Corporate Services Group and the University has to Equality and Diversity issues, alongside the fostering of good relations between groups.

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

One group not mentioned above are those with lower incomes who may not have appropriate IT access for use. Normally, IT facilities can be accessed free of charge at places including libraries in the UK, whereas similar provision is provided in other countries. Moreover, the University can provide free 24 / 7 IT provision. However, given the current pandemic situation, these resources may be limited and dependent on location, albeit as of spring 2021, the University is working to open as many of its locations accordingly.

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

The service follows the University guidelines on [University Web Accessibility Policy](#), which is based on the Web Content Accessibility Guidelines 2.1 AA standard, and the accessibility statement has been prepared and reviewed accordingly. Information will be provided in alternate formats, free of charge, upon request for disabled users.

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

We will continue to monitor any feedback for any potential positive or negative effects on the nine protected characteristics, in particular during the initial introductory phase of the service. We will continue to engage with the various stakeholders to gather information on potential impacts on any of the nine protected characteristics as appropriate.

- 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 substantial other than noted above.

F. Equality Impact Assessment Outcome

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

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.

Based on the reasons detailed 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).

We will continue to review all feedback / comments, positive and negative, related to any of the 9 protected characteristics. We will also advise staff of the need to make reasonable adjustments where appropriate and to provide information in alternative formats free of charge for disabled users on request

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

A review will be carried out when there is any significant change to the system, or when any positive/negative feedback related to any of the nine protected characteristics is received. On each of these occasions the EqIA will be updated

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)): **Pei-Shan Yu, Data Scientist, Global Open Finance Centre of Excellence, Data-Driven Innovations, Corporate Services Group**

Accepted by (name): **Damien McGarrigle, Chief Operating Officer, Global Open Finance Centre of Excellence, Data-Driven Innovations**

Date: **10th September 2021**

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