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): **Information Security Policy**

The Information Security Policy mandates that all individuals within the scope of the policy must complete information security awareness training. To support this requirement, a range of options are delivered centrally by the Information Security Divisions, one of which is a new online training course has been developed to help staff understand what actions they should take to maintain the security of the university's information assets at an individual level. The training is available via LEARN.

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

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

C. Person responsible for the policy area or practice:

Name: **Alistair Fenemore**

Job title: **Chief Information Security Officer (CISO)**

School/service/unit: **CISO Directorate**

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 **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 – Visually impaired, audibly impaired
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership[1]

The new online training is available to all staff and is mandatory so therefore has the potential to affect all 9 equality groups, but we feel there may be particular impact on disabled staff. The system has been tested to ensure it meets the Web Content Accessibility Guidelines version 2 AA standard as far as possible including compatibility with assistive technology. The training does involve an assessment which staff must pass – this too has been checked for accessibility and allows multiple attempts with no time out feature. If as with the training a member of staff was unable to complete the online assessment form we would ensure reasonable adjustments were put in place accordingly such as offering the individual the chance to complete the assessment in a different way – such as paper/one to one etc.

There is also a potential for an impact on race as the training is in English but as English is the main teaching language of the University we do not envisage that this should cause a problem.

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups:
  The Information Services Disability Information Officer has checked the online system for accessibility and compliance with the Web Content Accessibility Guidelines Version 2 AA standard and made recommendation which we have implemented as far as possible. Where changes related to the underlying LEARN platform we have fed this back to staff liaising with Blackboard Learn to request these further improvements.

- Any gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed:
  We have had sufficient, relevant, input to proceed at this time.

- 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 implementation of this policy will result in any form of prohibited conduct. We will put in place reasonable adjustments where these are required, for instance if any user is unable to complete the online training for a reason related to a disability we will provide equivalent training outcomes being facilitated via printed documentation, providing the training as a face to face learning session etc.)

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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.

- If the policy/practice contributes to advancing equality of opportunity[2]
  By ensuring the training does not lead to any form of prohibited conduct and is as accessible to staff as possible we would hope that this would advance equality of opportunity by ensuring no member of staff is excluded from this process.

- If there is an opportunity in applying this policy/practice to foster good relations:
  By doing all we can to ensure that the training is as accessible as possible we hope this will demonstrate our commitment to Equality and Diversity and show the seriousness with which we consider these issues.

- If the policy/practice create any barriers for any other groups?
  The policy should not create any barriers for any other groups such as those on lower incomes as all staff have access to free 24 hour computing facilities.

- How the communication of the policy/practice is made accessible to all groups, if relevant?
  A variety of methods will be used to alert staff to the training including email, face to face, posters etc. Alternative formats such as large print etc will be available on request. This information is provided on our webpages which have been tested for accessibility in line with the Universities Web Accessibility Policy which is based on the Web Content Accessibility Guidelines Version 2 AA standards.

- How equality groups or communities are involved in the development, review and/or monitoring of the policy or practice?
  Having performed the remediation work recommended by the Disability Information Officer, we will continue to monitor all relevant feedback provided by users of the training.

- 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:
  N/A

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. **Because of 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). We will seek feedback from the target community impacted by the practice and consider relevant alterations that could be incorporated to future training.
   - **Staff will be alerted to the need to make reasonable adjustments and the need to provide documents in alternative formats upon request.**
   - **All feedback will be monitored for any positive or negative feedback related to any of the 9 protected characteristics**
   - **We will continue to liaise with our staff who are in conversation with Blackboard Learn to seek accessibility improvements at this level.**

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

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2. When will the policy/practice next be reviewed?
   The Policy will be reviewed when it or the training undergoes a significant change or when we receive any positive or negative feedback related to any nine of the 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)):
David Creighton-Offord: Information Security Consultant, Information Services

Accepted by (name): **Alistair Fenemore - Chief Information Security Officer, Information Services**
[This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]

Date: **19th April 2018**

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