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): **Introduction of a media asset management system**

B. Reason for Equality Impact Asessment (delete as applicable):

- **Proposed new policy/practice**
  Update 2017: This update is a review of the existing EqIA version published in 2016
  Update 2018: This update is a review of the existing EqIA version published in 2017
  Update 2021: This update is a review of the existing EqIA version published in 2018

C. Person responsible for the policy area or practice:

Name: **Anne-Marie Scott**

Job title: **Deputy Director**

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

Update 2021

Name: **Karen Howie**

Job title: **Head of Digital Learning Applications and Media**

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

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? (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[1]

The Media Hopper Create asset management system allows all staff and students to manage their video and audio assets easily in a central location online. Media Hopper Create Is a rebranded version of Kaltura, an existing product.

The new system does have the potential to impact on all 9 protected characteristics as it will be publically available to all staff and students, however we believe the only real impact will be on disability and race. There will be an impact on race as the system will mostly be in English however this is the main teaching language of the University. The opportunity to add foreign language subtitles may also allow us to make our media systems more helpful to international students.

Disability may be impacted because the new system must take account of the need to be compatible with assistive technology such as voice recognition software, screen readers or screen magnification software. We will ensure as far as possible that the system promotes and facilitates compliance with the Web Content Accessibility Guidelines version 2 (http://www.w3.org/TR/WCAG20/). Kaltura states that their system is complaint with American Accessibility regulation 508. All of the player's UI components are available via HTML5. Controls are available via HTML5 even when the video is being served on Flash. The increased promoted use of media may also be beneficial to some disabled users e.g. those with specific learning impairments who may benefit from a range of teaching materials as opposed to just large pieces of text.

All content published to the system 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.

Update 2017: All content has the ability to be 'flagged' for moderation, and since launch we have received no incidents of discriminatory content being indicated either in this manner, or through other communications. In addition, this year a joint pilot has been undertaken between the a subgroup of the disability Technology and Information Committee and Media Hopper Create to look at using the services provide by Media Hopper Create to assist staff with the subtitling of video content and it is hoped this will improve the standard of and increase the number of videos with subtitles. It is hoped this pilot may provide a way forward in terms of a longer term solution to supporting staff in adding captions.

Update 2018: In line with the last update we have no incidents of discriminatory content but remain vigilant. In addition the subtitling pilot has resulted in some recommendations which are being considered by senior management and which we will aim to take forward in the coming year.

A new user interface was introduced in August 2018. The interface benefitted from enhancements in accessibility implemented by the vendor. Extensive testing was undertaken and the results indicated an improvement in accessibility.

In late September 2018 Kaltura introduced a Voluntary Product Accessibility Template (VPAT) which is a self-disclosing document evaluating how accessible products are according to the Section 508 and WCAG 2.0 regulations. It is the leading global reporting format for accessibility evaluations. We have advise Kaltura that the WCAG guidelines have been updated to version 2.1

This VPAT covers Kaltura MediaSpace and Applications (KAF integrations) 5.69.x, Kaltura Editor 2.22.1, and Kaltura Media Player 2.71.x, including the IVQ (Interactive Video Quiz) component.

[Voluntary Product Accessibility Template (VPAT)](#)

[Kaltura accessibility standards](#)

Update 2021: In line with the last update we have no incidents of discriminatory content but we continue to monitor and review content.

Users can now request automatic 'machine transcribed' captions for content stored on Media Hopper Create. These are fully automated and 80-90% accurate and users can fix any incorrect matches, timing issues, etc. through a web interface. Either the owner of the content on Media Hopper Create, or someone who has been added as a 'co-editor' can request and edit captions.

This is the Media Hopper Create service accessibility statement in line with Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

[Accessibility statement for Media Hopper Create's use at the University](#)

Add notes against the following statements where applicable/relevant:

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

  The IS Disability Information Officer has been involved in the procurement of the system and any changes in the system will be tested to ensure they are accessible. All feedback will be monitored for any comments positive or negative related to any of the 9 protected characteristics. Although the University realises that the need to use an accessible system lies with us not the manufacturers we understand that Kaltura has an advisory board is comprised of accessibility experts from institutions including Purdue University, The University of Missouri, The University of Notre Dame, National University, The University of Illinois, The University of British Columbia, The University of Oklahoma and others. The charter of the group is to evaluate industry best practices, guidelines, and regulations including Section 508, WCAG 2.0, WAI-ARIA, and ADA in order to work with Kaltura and partner organizations on a continuous plan for improvement and innovation in advanced accessibility and usability within Kaltura's main solutions including the company's learning management system integrations, campus/district video portal, the management console (KMC) and personal capture solution – CaptureSpace. From there, the goal is to develop and share best practices around video accessibility within the education industry as a whole.

  Update 2021: We are actively reviewing the Media Hopper Create captioning and transcription quality whilst reviewing other options and flagging concerns to Kaltura.

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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.

- 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.

  Update 2017 – we continue to feel we have sufficient information

  Update 2018 – we continue to feel we have sufficient information.

  Update 2021 – we continue to feel we have sufficient information.

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

  We do not see where the implementation of the asset management will have any negative impact on any equality groups per se and may have a positive effect as it would allow us to provide foreign language subtitles if requested and make the process of English subtitling for those with hearing impairment faster and easier. We do not feel that this system will lead to any form of prohibited conduct. We will ensure all requests for reasonable adjustments are dealt with accordingly, using existing processes for requesting adjustments, and all materials on the system will be available in alternative formats free of charge on request.

  Update 2017: We have received no reports that the implementation of the Media Hopper Create service has led to any forms of prohibited conduct.

  Update 2018: We have received no reports that the implementation of the Media Hopper Create service has led to any forms of prohibited conduct.

  Update 2021: We have received no reports that the implementation of the Media Hopper Create service has led to any forms of prohibited conduct.

- If the policy/practice contributes to advancing equality of opportunity[2]

  Media Hopper Create is a centralised repository for media which adheres to recognised accessibility standards and guidelines will promote good practice. One of the main benefits of Media Hopper Create is that it makes it simple to create new video and audio content and is freely available to staff and students across the University at no charge. It therefore can be used proactively as a tool to support provision of reasonable adjustments, for example providing information as spoken work instead of written text to support the needs of those with specific learning disabilities. Additionally, the increased availability and ease of subtitling, captioning or provision of transcripts will make our media more accessible to those with hearing or visual impairments.

  Update 2017: Media Hopper Create has been used widely across the University for a variety of reasons, including making lecture material available with spoken-word accompaniment. The ability to search slides that have been uploaded to the service also promotes ease of access to these materials. In addition, this year a joint pilot has been undertaken between the a subgroup of the disability Technology and Information Committee and Media Hopper Create to look at using the services provide by Media Hopper Create to assist staff with the subtitling of video content and it is hoped this will improve the standard of and increase the number of videos with subtitles. It is hoped this pilot may provide a way forward in terms of a longer term solution to supporting staff in adding captions.

  Update 2021: Media Hopper Create users are now able to request machine generated captions for their video content. Although not perfect (80-90% accuracy) they do, in

general, improve the accessibility of the media created. Additionally, media owners and editors have the option to edit and correct any errors or issues in the auto generated captions.

The captioning accuracy has now been calculated as 93% which is a considerable improvement. We are focused on improving the quality further and are looking at ways to achieve this.

The CaptureSpace desktop recorder has been replaced with Kaltura Capture employing a far simpler and more intuitive user interface. Kaltura Capture which includes an online editor and keyboard shortcuts for all functions.

The university has made a Media Hopper Create app available for download for IOS and Android devices. The Media Hopper Create app is a rebranded version of Kaltura's KMS GO app and aims to provide a familiar user experience to the Media Hopper Create video portal, with easy discovery of content, sharing, viewing, commenting and search tools.

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

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

  We will continue to promote accessibility as part of our training and support for the system which we feel will continue to demonstrate the seriousness by which Edinburgh University takes the issues of Equality and Diversity and in this case in particular the needs of disabled user and the desire to make the systems they use as accessible as possible and to mainstream as many adjustments as possible. In a wider sense, the University has the highest level of support contract with Kaltura, which allows us to feedback and influence through their Product Advisory Committee to improve accessibility.

  Update 2017: Guidance on uploading subtitles and transcripts is available on the Media Hopper Create pages on the University website, along with information about the University's policy on transcription.

  Update 2018: A redesign of the User Interface is planned to further improve accessibility underpinning our commitment to promote accessible services.

  Update 2021: User can now request machine generated captions and the University is looking at ways to refine and improve this process.

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

  No equality group will be excluded by implementation of the policy. The content hosted on the system can be captioned for any language as well as English for those who have hearing impairments. The University offers free 24 hour access to computers for all students and staff so there should be no disadvantage to those on lower incomes who may not have their own devices.

  Update 2017: The service is available for all students and staff, with full access regardless of any protected group status. We have received no feedback related to any of the 9 protected characteristics to suggest there are any barriers to any other groups.

  Update 2018: The service is available for all students and staff, with full access regardless of any protected group status. We have received no feedback related to any of the 9 protected characteristics to suggest there are any barriers to any other groups.

  Update 2021: The service is available for all students and staff, with full access regardless of any protected group status. We have received no feedback related to any of the 9 protected characteristics to suggest there are any barriers to any other groups.

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

  We will publish appropriate information on EdWeb, which complies with the Web Content Accessibility Guidelines Version 2 AA standard. All communication about the policy will be available in alternative formats upon request as well as any materials that form part of the system.

  Update 2017: Information is available on EdWeb, with regularly updated Guides, Support Documentation, and Frequently Asked Questions. We have received no requests for information in alternative formats.

  Update 2018: Information is available on EdWeb, with regularly updated Guides,

Support Documentation, and Frequently Asked Questions. We have received no requests for information in alternative formats.

Update 2021: Information is available on EdWeb, with regularly updated Guides, Support Documentation, and Frequently Asked Questions. We have received no requests for information in alternative formats.

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

We will continue to involve the IS Disability Information Officer to ensure the system is as accessible as possible for disabled users. We will monitor all feedback for any comments related to any of the 9 protected characteristics and act accordingly through regular reviews of support calls, and through proactive engagement activities within the academic Schools in support of learning technology more generally.

Update 2017: We have received no reports of comments being made about or related to any of the 9 protected characteristics in content hosted on this service or regarding this service.

Update 2018: We have received comments about some of the quality of subtitles on some videos. All staff have the facility to add subtitles by hand. We also offer a service through Media Hopper Create which provides machine produced subtitles that are approximately 70%accurate which we advise will need editing. We believe the current negative feedback is due to staff not editing the subtitles as requested due to other time constraints. It is planned that the current subtitling report and recommendations that are being considered by senior management will clarify the long term approach to this. In the meantime we are responding to any issues by supporting staff to edit and improve the subtitles on their videos and have written guidance to support them do this.

Update 2021: We will continue to engage with various stakeholders, including but not limited to the Student Disability Service, Edinburgh University Students' Association and trades unions accordingly. Automated captioning accuracy has been calculated as 93% and we are looking to see how we can improve on that figure.

- 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:

No

Update 2017: This has not changed.

Update 2018: This has not changed.

Update 2021: This has not changed.

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. (Delete the options that do not apply):

Option 1: No change required – the assessment is that the policy/practice is/will be robust.

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

Option 4: Stop the policy or practice as there are adverse effects cannot be prevented/mitigated.

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 for the reasons stated above.

Update 2017: The policy/practice remains to be robust.
Update 2018: The policy/practice remains to be robust.
Update 2021: The policy/practice remains to be robust.

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).

   Monitor and respond to all feedback.
   Regularly consult with our colleagues who are experts in accessibility.
   Promote good practice when users are creating content through online guidance and workshops.
   Ensure staff are aware of the need to provide materials in alternative formats upon request and promote Media Hopper Create as a tool that may be used to meet that need where appropriate.

   Update 2018 – we will continue with all the actions listed above
   Update 2021 – we will continue with all the actions listed above

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

We will review the system in January 2017 or before if there are any changes to the system or we receive any positive or negative feedback related to any of the 9 protected characteristics.

Update 2017: The system will be reviewed again in January 2018, or before if necessary in regard to the above.

Update 2018: The system will be reviewed again in September 2019, or before if necessary in regard to the above.

Update 2021: The system will be reviewed again in January 2022, or before if necessary in regard to the above.

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)): **Stephen Donnelly. Media Team Manager, Digital Learning, Applications and Media**

Accepted by (name): **Anne-Marie Scott, Deputy Director, Learning Teaching and Web Services, Information Services**
[This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]

Date: **20/01/16**

Update 2021

Accepted by (name): **Karen Howie, Head of Digital Learning, Applications and Media**
[This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]

Date of update: 13/02/17 undertaken and accepted by as stated above.
Date of update: 11/05/2018 undertaken and accepted by as stated above.
Date of update: 25/05/21 undertaken and accepted by as stated above

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