



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):

A pilot project to implement multi-factor authentication (MFA) for Microsoft 365 Exchange

The project will implement MFA for Microsoft 365 exchange for a pilot group of users. Users who had opt-in to the pilot would face a second challenge to verify their accounts before being able to access email, similar to that they may experience when using online banking. The Pilot group will require access to a mobile phone as the main device which they will use for verification.

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: **Graeme Wood**

Job title: **Head of Enterprise Services**

School/service/unit: **IT Infrastructure, Information Services Group**

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)

Update 2021

- age
- disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership

Add notes against the following applicable statements:

This MFA pilot has the potential to affect all users, and therefore may impact on all nine protected characteristics. However, the protected characteristic of disability may have the greatest impact, as this relates to working in conjunction with another device, either through a mobile or landline phone. A key component of the pilot is testing how reasonable adjustments can be implemented, in particular should a disabled staff member prove unable to operate the technology associated with MFA. In particular the pilot aims to look at what impacts users of assistive technology may face when dealing with MFA. In addition, some of the verification methods may prove difficult to use for users with impaired manual dexterity, for example they may not be able to complete the verification method within a fixed time or those with short term memory impairments (such as remembering a sequence of numbers/digits).

Furthermore, there is also the potential for the system to impact on race. We are aware that some countries, including China and occasionally Russia, may block access to some authentication processes. For instance, one of the four verification methods is not available to users in China, due to the policy of the Chinese government. The remaining 3 methods are available to users in China. If it became apparent that all processes were being blocked, then we would users from these countries were not placed at a disadvantage during the pilot by allowing them to complete the MFA process in another manner subject to a decision by the University Information Security Officer.

The pilot has been made open and available to all staff, 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 contribute to the pilot.

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.

- **On any available information about the needs of relevant equality groups:**
 - We are trying to recruit as diverse a range of groups and communities as possible to the pilot
 - We are liaising and will continue to do so with the Student Disability Service, The Staff Disability Network and the Disability Information officer
 - We are also liaising with and will continue to do so Edinburgh University Students Association, Trade Unions and Edinburgh global

Any feedback received on the pilot will be monitored for any positive or negative impact on the nine protected characteristics, and acted on accordingly

- **Any gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed:**
 - The Pilot will seek to evaluate the user impact as actually experienced by the users
 - The Pilot may recommend that one or more methods of verification should be recommended, or additional verification methods are provided to users who require to use these

At this stage, we have sufficient evidence to proceed. Further information on impacts to any of the protected characteristics will continue to be monitored via any feedback we receive, positive and negative, when users begin the pilot. If feedback is received showing a negative impact on a protected characteristic, this will be addressed by providing additional information on the service to mitigate the issue.

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

We do not feel that the MFA pilot will result in any form of prohibited conduct. We will endeavour to make the system as accessible as possible, and where issues are out with our control, this will be a key consideration for any potential implementation on a wider scale. While options for reasonable adjustments with regard disabled users may be limited, the consideration of both mobile and landline phones in the pilot is one consideration that has been put in place. Moreover, provision of utilising access through assistive technology is another option available to users. A review of these measures, alongside any feedback received, positive or negative, on all nine protected characteristics will be crucial in assessing the pilot.

- **If the policy/practice contributes to advancing equality of opportunity¹**

The MFA pilot may help advance equality of opportunity as it reinforces the University commitment to information and data security, and in turn prohibited conduct. We would hope that the pilot would advance equality of opportunity by ensuring no member of staff is excluded from this process. Moreover, the 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:**
 - Security of accounts and data for users will be improved.

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

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

There is a potential for a barrier for those on lower incomes for example users who do not have access to a mobile phone would be impacted, although we will be testing the user experience when using a landline for verification. We are also aware of staff who may have low digital awareness and may access their university email very infrequently and we are

¹ This question does not apply to the protected characteristic of marriage or civil partnership

actively trying to recruit such users to the pilot. We will continue to monitor whether this is an issue and ensure work arounds are put to place to ensure no one is placed at a disadvantage wherever possible.

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

Describe here how the pilot was advertised and how participants were communicated with – for instance were they able to say what method they wished to be receive communications by. Most communication will be by email and website. The University has a Web Accessibility Policy which is based on the Web Content Accessibility Guidelines 2,1 AA standard. Information will provided in alternate formats free of charge on request for disabled users.

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

- Consideration will be given to recruit a diverse range of groups and communities to the pilot
- We are liaising and will continue to do so with the Student Disability Service, The Staff Disability Network and the Disability Information officer
- We are also liaising with and will continue to do so Edinburgh University Students Association, Trade Unions and Edinburgh global

Any feedback received on the pilot will be monitored for any positive or negative impact on the nine 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 other than that stated above.

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 2: Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.
For 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).

- The benefits to users and the impact on users and support staff supporting them will be evaluated during and after the Pilot.
- Whether to roll out MFA more widely will be determined by the Board, CPAG and ITC and will likely be undertaken by a new project which would revisit this EqIA.
- Staff will be made aware of the need to make reasonable adjustments and to provide information in an alternative format upon request.
- We will continue to monitor all feedback positive and negative for any feedback related to the nine protected characteristics.

Also

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

At the project board meeting at the end of January, and then on completion of the Pilot. .
A review shall also take place if there are any changes to the pilot, or we receive feedback, positive or negative, related to any of the nine protected characteristics. On each of these occasions the EqlA will be updated

H. Publication of EqlA

Can this EqlA be published in full, now? Yes

If No – please specify when it may be published or indicate restrictions that apply:

The EqlA would be published on completion of the evaluation of the Pilot.

I. Sign-off

EqlA undertaken by (name(s) and job title(s)): **Morna Findlay, Project Manager, IT Infrastructure, Information Services Group**

Accepted by (name): **Graeme Wood, Head of Enterprise Services, IT Infrastructure, Information Services Group**

Date: **16th June 2021**

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