



## Equality Impact Assessment Guidance and Template

This form is intended to help you decide whether an Equality Impact Assessment (EqIA) is needed and, if it is, to carry out the assessment of impact.

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement 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](http://www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment)

EqIA is part of the University's general equality duty under the Equality Act 2010 and the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. The Equality Act 2010 specifies the following 'protected characteristics': age, disability, race (including ethnicity and nationality), religion or belief, sex, sexual orientation, gender reassignment, pregnancy and maternity, and marriage or civil partnership. This form uses 'equality group' to mean persons who share a relevant protected characteristic.

The University has a general equality duty to have due regard to the **needs** to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people who share a relevant protected characteristic and people who do not share it.

Under the Scottish Regulations, the University has a specific duty – subject to relevance and proportionality - to assess the impact of applying proposed new or revised policies and practices against the needs above. 'Policy and practice' should be interpreted widely to include the full range of the University's policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services – essentially everything we do.

This form is a tool to help with screening and EqIA and is designed to lead you through the process through asking pertinent questions and giving examples. However, the law does not dictate a particular form for EqIA. The requirement is to actively consider how a policy or practice will meet the general equality duty, and take any necessary action. Wherever practicable, EqIA should be built into standard processes and tailored to the nature of the policies or practices involved.

It is, however, necessary to publish EqIA where the policy or practice is applied, so all EqIAs – in whatever format - should be sent to [equalitydiversity@ed.ac.uk](mailto:equalitydiversity@ed.ac.uk) for publication.

The form includes: some details about the policy/practice; a screening analysis to indicate whether full EqIA is required; and then a number of questions to enable full EqIA.

Answers should be recorded after the questions and the form can be expanded and supplemented as required. Answers may be as long or short as is necessary and relevant, bearing in mind that the effort involved in EqIA should be proportionate to the relevance of the policy or practice to equality.

Once completed, this form will be the record of the screening and, where applicable, the EqIA of the policy or practice. All full EqIAs are published.

A. Policy or Practice (name or brief description):

Practice. Upgrade of the IT system which is used in some courses to support Student's in creating e-portfolios to support learning. The system is called Pebblepad and the upgrade is from v2 to v3.

Update (2017): **PebblePad is the University's ePortfolio system. It comprises of two parts Pebble+, which is the eportfolio part and is available to all staff and students, and also ATLAS, which is the assessment part of PebblePad allowing instructors to grade and provide feedback on submitted work.**

**Pebble+ was the main part upgraded with improvements coming to ATLAS in a more incremental manner.**

**PebblePad integrates with both Virtual learning Enviroments (VLE's) s and can be accessed by all users through the University portal system MyEd. It can also be accessed via direct URL.**

**PebblePad has many features in both parts of the application. In Pebble+ users can create various pieces of work either from scratch or by using scaffolding templates including workbooks provided by other users. They can create portfolios and blogs to showcase their work and publish these to the web for others to view.**

**The University has been using PebblePad for around ten years and usage has grown over time. During the Academic Year 2015/16 users logged into Pebble+ over 96,000 times and there were over 22,000 submissions into ATLAS, these users can be staff or students.**

B. Reason for screening (delete as applicable):

- Proposed change to an existing policy/practice

**Update (2015): Update of original EqIA published in 2013**

**Update (2017): Update Of EqIA as result of upgrade from Pebble+ v3 to v5**

C. Person responsible for the policy area or practice:

Name: [Mark Wetton](#)

Job title: [Head of Learning Services](#)

School/service/unit: [User Services Division](#)

**Update (2015): Stuart Nicol, Head of Educational Design and Engagement, Learning Teaching and Web Services Division**

**Update (2017): Jo Spiller, Head of Educational Design and Engagement, Learning, Teaching and Web Division**

D. Screening Analysis

1. Does the policy or practice affect primary or high level functions of the University? **Yes**
2. Is the policy or practice relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' set out in the introduction above)? **Yes**
3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? **Yes**

If the answer to any of these questions is 'Yes', an EqIA should be carried out on the proposed/revised policy or practice at an early stage and in any event before it is finalised.

#### E. Screening outcome

Equality Impact Assessment required: **Yes**

Record notes about the screening process or outcome here.

- The PebblePad upgrade may potentially affect ~7000 students. It should be ensured that the new system will not negatively impact on any of the 9 protected characteristics.

#### F. Sign-off

Screening undertaken by: **Stuart Nicol, eLearning Advisor, USD Learning Services**

Accepted by (name): **Mark Wetton**

Date: **21<sup>st</sup> June 2013**

Update (2015): **Stuart Nicol, Educational Design and Engagement Section, Learning Teaching and Web Services Division.**

Update (2017): **Steph Hay, Digital Learning Applications & Media, Learning, Teaching & Web Division**

If EqIA is not being carried out, delete the remainder of this form and send the completed form to [equalitydiversity@ed.ac.uk](mailto:equalitydiversity@ed.ac.uk).

#### G. Equality Impact Assessment

Before assessing the policy/practice, ensure that you have a clear understanding of the purpose of the policy or practice, the context, the intended beneficiaries and the results aimed for.

In answering the questions below:

- Bear in mind that the extent of EqIA should be proportionate to the relevance of the policy/practice to equality. It may not be practicable or necessary to answer every question or address every potential scenario.
- Focus mainly on aspects of the policy/practice that are most relevant to the question, to ensure most attention is given to the most important areas.
- Relate answers to consideration of the available evidence and address any gaps or disparities revealed, where feasible without disproportionate effort. For new policies, assess potential impact.
- Describe any action identified to address any issues highlighted.
- Where there is potential for adverse impact, but the policy/practice will still be applied, indicate the rationale for that decision.

Initial/partial EqIA: in some circumstances - particularly for new policies/practices – there may be limited information on which to base EqIA. In these cases, the EqIA should be carried out to the extent possible and should identify arrangements for monitoring/investigation of equality impact and for fuller EqIA in future.

Wholly positive impact: Some policies/practices may be viewed as having only positive equality impact. For these, consideration should still be given to ensure that no adverse

impact is overlooked and to ensure that full advantage is taken of the positive impact, e.g. through effective communication. However, the effort involved in carrying out EqIA should not be excessive.

1. Overview. Indicate the current status of the policy/practice or the stage of development/review. Also note any general comments here regarding the relevance and significance of the policy/practice to equality. Which aspects of the policy/practice are particularly relevant (which should be the main focus for EqIA)? On what aspects of equality does the policy/practice particularly impact?

The hosted PebblePad e-portfolio service, which has been available to all staff and students at the University since 2009, is being upgraded to version 3. This upgrade will be implemented on 26/06/2013. The PebblePad service is of strategic importance to the University as it supports reflective learning activities and processes. The main concern which led to this equality impact assessment is with any potential impact on disabled users

The upgrade includes a substantial redesign of the user interface. The Flash interface of version 2 (the existing service) included in-built accessibility features (e.g. screen-reader with avatar). Version 3 (the upgraded service) comes with a separate 'accessible' HTML version of Pebble+ as well as the main Flash interface. This new accessible version currently lacks some features found in the main interface. The University has expressed concern to Pebble Learning about this, and expressed a preference that the primary interface be made 'accessible', and is currently working with Pebble Learning to ensure improvements are made to the system. The University has secured assurances that the accessible version will be significantly improved by the start of 2014 with a move to a single, accessible interface by the summer of 2014. Pebble Learning have also agreed to keep the University informed regularly regarding progress.

**Update (2015): All the necessary features have been added to the accessible version of Pebble+. Pebble Learning are also working toward a fully HTML5 version of Pebble+ for the next release. Moving from Flash & HTML to HTML5 only will not only provide equity across all users but will also improve the general user experience and increase accessibility.**

**Update (2017): This upgrade moves the Pebble+ system from Flash & HTML to HTML5 only, this has increased accessibility and provide equity across all users.**

2. To which equality group(s) is the policy/practice relevant? Policies/practices applying to substantial groups of students or staff will be relevant to all equality groups, which should be noted. However, also indicate any equality groups for which the policy/practice is particularly relevant, and why.

The protected characteristics under the Equality Act are (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<sup>1</sup>

PebblePad is available to all staff and students at the University and therefore it has the potential to be relevant to all groups. It is particularly relevant to some disabled users who may rely on assistive technology to access web resources. Also, as PebblePad is only available in the English language, it may impact on non-English speakers.

Pebble Learning supply an accessible version of PebblePad which is compatible with most assistive technologies and, as English is the main teaching language of the University, there should be no expectation for the system to be available in alternative languages.

**Update (2017): Pebble+ is predominantly used by students to create assets to be submitted into ATLAS. However it has the potential to be used by all staff and students independently to coursework and for users own learning. This potential means Pebble+ has the capacity to affect all protected characteristics however we the protected characteristics most likely to be affected are disability and race. Pebble+ is relevant to disabled users, who may rely on assistive technology to access the system and require it to meet the current accessibility guidelines Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and be compatible with assistive technology. The system has the potential to impact on Race as the system is only offered in English but as English is the main teaching language of the University we do not believe this will create any disadvantage.**

**With regards to the other protected characteristics all content added to the website 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.**

In answering the questions below consider each of these equality groups. As part of this, consider diversity within, as well as between groups (e.g. different disabilities, different racial groups). Consider the implications of combinations of protected characteristics e.g. issues of relevance to women may vary once race, religion and age are taken into consideration. Also consider the impact on those with caring/family responsibilities (which tends to impact more on women).

3. What evidence is available about the needs of relevant equality groups? E.g. information/feedback from equality groups or other stakeholders, involvement or research with equality groups or individuals, equality monitoring data, service monitoring data, information for other similar policies/practices, staff surveys, research reports, demographic information, audit, inspection or management reports and recommendations.

The Information Services Disability Information Officer (IS DIO) has completed a detailed accessibility review of the upgraded PebblePad service and will continue to review the accessibility of all new developments.

**Update (2017): We have run the proposed upgrade system past the Disability Information Officer who provided written feedback on the new version. All users are encouraged to give feedback regarding the new version and any potential feedback related to any of the 9 protected characteristics is addressed and acted on as appropriate.**

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<sup>1</sup> 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.

Where are the gaps in evidence? If there is insufficient information to properly assess the policy, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the policy/practice. Note: the resources put into collecting evidence should be proportionate to the relevance of the policy/practice to equality.

We have taken the view that because this is an upgrade to an existing service, and the IS DIO has carried out comprehensive accessibility testing, it would not have been proportional to involve users from protected groups directly at this stage. However, we will monitor feedback from users and review this approach to evidence gathering where appropriate.

**Update (2015): We have monitored feedback and where there have been issues, for example the lack of Workbook creation functionality in the accessible version, Pebble Learning have prioritised features in the accessible version development to ensure no users are disadvantaged We have received no positive or negative feedback related to any of the other protected characteristics.**

**Update (2017): No gaps in evidence, we feel we have sufficient information to proceed at this stage and will continue to monitor.**

4. Might the application of this policy/practice lead to discrimination, harassment or victimisation? Might it result in less favourable treatment for particular equality groups or give rise to indirect discrimination?

The system currently has two interfaces: a Flash version with poor accessibility features; and an accessible HTML version. We are advised by Pebble Learning that they are working towards delivering the system in a single accessible interface in a future upgrade. We also recognise that some features are currently missing in the accessible version and are working with Pebble Learning to ensure that the features affecting the biggest user groups are prioritised in their development schedule (see table below). Pebble Learning are committed to delivering all features in the accessible version by January 2014.

Missing feature	Impact	Due
Activity Log	All users - high	September 2013
Folio Page	All users - medium	
Webfolio	All users - high	
Messages	All users – low	
Tags	All users – low	
Link to Google Drive	All users – low	
Admin	Admin only	
Customise appearance	All users - medium	January 2014
Collections	All users - medium	
CV	All users - medium	
Template builder	Mainly tutors - medium	
Workbook builder	Mainly tutors - medium	

Although the system is only delivered in English, there should be no expectation from users that the system will be available in any other language as the teaching language of the University is English.

**Update (2015): The only item that hasn't been implemented in the accessible version is the Design New > CV. This is not a commonly used feature in PebblePad and we have received no negative feedback about this.**

**Update (2017): The new version is no longer based on Flash and there is no longer a need for a separate accessible system. We do not believe the upgrading of this tool**



will result in any form of prohibited conduct. Any need for reasonable adjustments will be put in place such as provision of PowerPoints or PDFS in alternative formats. Information Services provided online advice on how to create accessible documents <http://www.ed.ac.uk/information-services/help-consultancy/accessibility/creating-materials>

5. Are reasonable adjustments built in where they may be needed?

In the period between upgrade and delivery of all features in the accessible version, Learning Services will publish potential solutions to accessibility issues, along with any reasonable adjustments that Schools should put in place, on the Learning Services PebblePad web pages. Schools should ensure that users are able to access all information that they require in an alternative format.

**Update (2017): No reasonable adjustments have been requested.**

6. Does the policy/practice contribute to advancing equality of opportunity<sup>2</sup>? Will it help to:
- remove or minimise disadvantage
  - meet the needs of different equality groups
  - encourage increased participation of particular groups
  - take account of disabled people's impairments?

Once a fully featured version of the accessible PebblePad interface has been delivered the service will enable disabled users to fully participate in online e-portfolio related activities.

**Update (2017): The upgraded version of Pebble+ is much more accessible than its predecessor, this has been shown through the testing by the Disability Officer. We are now able to remove the separate link for an accessible version of Pebble+, which we had to manage previously. This will hopefully improve the system for disabled users and therefore advance equality of opportunity by ensuring more disabled users can access the system and reduce the need for reasonable adjustments such as the separate accessible version.**

7. Is there an opportunity in applying this policy/practice to foster good relations between people in any protected group and those who are not<sup>3</sup>? Will it help to tackle prejudice and/or promote understanding?

This process has the potential of highlighting to schools the need to ensure that reasonable adjustments are in place for disabled users when there is a requirement to use a specific system or method. This may help to improve other services and facilities schools offer by increasing awareness of these issues.

**Update (2017): The upgraded version of Pebble+ is much more accessible than its predecessor, this has been shown through the testing by the Disability Officer. We are now able to remove the separate link for an accessible version of Pebble+, which we had to manage previously. This will hopefully improve the system for disabled users and therefore advance equality of opportunity by ensuring more disabled users can access the system and reduce the need for reasonable adjustments such as the separate accessible version.**

8. Is there evidence (or an expectation) that people from different equality groups have different needs or experiences in relation to the policy/practice? If so, what are they?

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<sup>2</sup> This question does not apply to the protected characteristic of marriage or civil partnership

<sup>3</sup> This question does not apply to the protected characteristic of marriage or civil partnership.

Pebble Learning have specifically designed the PebblePad interface to be rich and visually appealing in order to cater to users with a wide range of learning styles. This may include users in a number of equality groups.

9. Is there evidence (or an expectation) of higher or lower uptake by any equality group(s)? If so, give details of the differences and the reasons for these (if known)?

No.

**Update (2017): No.**

10. Is any equality group excluded from participating in or accessing the service or functions? If so, why?

As the system is only available in the English language, non-English speakers will be excluded. However, as users of this system will be enrolled on courses at a university where English is the teaching language this should not create any disadvantage.

11. Does the policy/practice create any barriers for any other groups? For example, because of the time when the service is delivered or because of restricted income? Is the communication of the policy/practice accessible to all groups?

The University provides 24 hour access to computing facilities for all students so there should not be any disadvantage to users, on the basis of income, caused by IT-based systems.

**Update (2017): We do not believe this policy will lead to any barriers for any other groups. The University offers free 24 hour access to computing facilities for all staff and students which may be needed by users on lower incomes who do not have access to their own computing facilities.**

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

The Information Services Disability Information Officer is reviewing the accessibility of the system on an on-going basis for disabled users. In addition all feedback will be monitored and acted upon to ensure there is no negative impact on any protected characteristics.

**Update (2017): We have had key users accessing a demonstration site with the new version since January 2017. Overall all feedback has been positive on the upgraded tool. We will continue to monitor all feedback for any positive or negative impacts on any of the 9 protected characteristics.**

13. Are there any other points to note regarding the potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations? If so, note these here.

The information we provide to users and schools on reasonable adjustments will be available in a variety of formats upon request.

**Update (2017): Alternative forms of documentation are available on request. This information will be provided on our webpages with have been tested for accessibility in line with the Web Content Accessibility Guidelines Version 2 AA standard.**



## H. Equality Impact Assessment Outcome

There is a legal obligation to take account of the results of the EqIA in the development of a new or revised policy or practice. This requires considering taking action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and exploiting any potential for positive impact. Clearly any unlawful discrimination must be eliminated.

Having considered the answers in section G, select one of the four options below to indicate how the development/review of the policy/practice will be progressed. Delete the options that do not apply.

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. This may involve removing or changing the aspect of the policy/practice that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact.

State the steps to be taken to adjust the policy or where these are specified in section G.

Where there are short-term gaps in functionality in the accessible version Learning Services will publish guidance on reasonable adjustments on the Learning Services website and liaise with schools where there are specific requirements. IS are liaising closely with Pebble Learning to ensure gaps in functionality are filled by providing a development priority list against which Pebble Learning have committed to giving 2-weekly updates on progress. We see this as an iterative cycle to make sure that we have a fully equivalent accessible version by start of 2014.

**Update (2017): Option 1: No change required – the assessment is that the policy/practice is/will be robust.**

**Pebble Learning have made changes to this upgrade to improve accessibility of Pebble+ for disabled users. Pebble Learning's products are designed and developed in accordance with the internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA. Information Services will liaise with schools and make them aware of the need to make reasonable adjustments as they arise for a disabled student.**

## I Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.

- Publish potential solutions to accessibility issues, along with any reasonable adjustments that Schools should put in place, on the Learning Services website, and ensure users are aware of their availability.
- Ensure schools are aware of the need to allow disabled users to submit work via alternative means if necessary without penalty.
- Work with Pebble Learning to ensure delivery of fully functioning accessible version, keeping stakeholders informed of progress.

**Update 2015: When we next upgrade or make changes to the application it will be reevaluated in terms of accessibility and compatibility with assistive technology.**

**Update (2017): Publish help and advice for disabled users on the Information Services webpages and ensure users are aware of their availability. Ensure all communications about the upgrade are available in alternative formats upon request. Ensure staff are aware of the need to make reasonable adjustments where required.**

2. State how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).

The project team and Information Services Helpline will monitor all feedback on the upgrade from users on an on-going basis to ensure no negative impact on any of the 9 protected characteristics.

**Update (2017): We will continue to monitor all feedback for any comments (either positive or negative) related to any of the 9 protected characteristics.**

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

The project team will review this Eq.I.A. in January 2014, when the updated accessible version becomes available, against all 9 protected characteristics. A key input to this will be a new accessibility review by the Information Services Disability Officer Learning Services will monitor this deadline via frequent updates from Pebble Learning and advise if this date needs to be moved for any reason.

**Update 2015: The EqIA will next be updated when there is any major change to the application, or when we upgrade to a newer version or when we received any positive or negative feedback related to any of the 9 protected characteristics.**

**Update (2017): If there is a major change to the system or the next upgrade or if we receive any positive or negative feedback related to any of the 9 protected characteristics.**

#### **J. Publication of EqIA**

EqIAs are published on the Equality and Diversity website.

There is a statutory requirement to publish EqIAs within a reasonable period. However, in some circumstances there may be valid reasons to limit what is published or to delay publication.

Can this EqIA be published in full, now? Yes

#### **J. Sign-off**

EqIA undertaken by (name(s) and job title(s)): [Stuart Nicol, eLearning Advisor](#)

**Update (2015): undertaken by Stuart Nicol, eLearning Advisor, 30<sup>th</sup> July 2015.**

**Update (2017): undertaken by Steph Hay, Service Manager, DLA&M**

Accepted by (name): [Mark Wetton, Head of Learning Services, User Services Division](#)

[This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]

2017 accepted by **Jo Spiller, Head of Educational Design and Engagement, Learning, Teaching and Web Division**

Date: [21<sup>st</sup> June 2013](#) , [30<sup>th</sup> July 2015](#), Last updated: **May 2017**

Retain a copy of this form for your own records and send a copy to [equalitydiversity@ed.ac.uk](mailto:equalitydiversity@ed.ac.uk)

