



## 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](http://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):**

This EqIA covers the ongoing implementation of a standardised approach to course enhancement questionnaires, data collection and reporting across the University.

**B. Reason for Equality Impact Assessment (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 **yes**
- Other (please state):

Following implementation of the Course Enhancement Questionnaire Policy and core question set for academic year 2016/17, a commitment was made to review the Policy in August 2017. In September 2017, following consultation, it was decided to include 'student engagement' questions in School question sets for piloting and evaluating in 2017/18 with a view to including a 'student engagement' in the core question set from 2018/19.

**C. Person responsible for the policy area or practice:**

Name: Barry Neilson

Job title: Director of Student Systems and Service Excellence Programme Lead

School/service/unit: University Secretary's 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 ✓
- is relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' as set out in the Policy and Guidance)? ✓
- It is one which interested parties could reasonably expect the University to have carried out an EqIA? ✓

**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 partnership<sup>1</sup>

Course Enhancement Questionnaires are undertaken for all taught courses so the practice will apply to a significant proportion of our academic colleagues and student body.

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

Literature exploring bias in these types of questionnaires and surveys exists, with gender being the most studied aspect. The research suggests that responses can be affected by bias and that respondents may give higher scores to some groups (e.g. male teachers) as a result.

A group of staff explored the semester 1 Course Enhancement Questionnaire data, and set the question 'Is there any evidence of gender bias and, if there is, to what extent?' This group consisted of academic staff from each of the three Colleges, including colleagues with an equality remit and union representation.

- The analysis of the data shows a small difference in the rating of female and male lecturers, with female lecturers being rated higher than male lecturers. The size of this effect is negligible. It was agreed that the effect, such as it is, could have many explanations other than a gender bias (for example, a confounding effect of class size). Given the small effect size, it was unanimously agreed that there was no useful action that could or should be taken.
- Therefore the group recommended that no more analysis of the current (semester 1) data be undertaken in relation to gender bias. Whilst recognising the research into gender bias in student questionnaires, the Group noted the importance of the exercise carried out to look at our own data, and recommended that it continues to be analysed in a similar way at appropriate intervals (to be determined through the Policy review).

A Group was established to develop communications and guidance for staff and managers in relation to mitigating the effects of any gender bias and the use of data for Course Enhancement Questionnaires in advance of semester 2 results being sent out. The resulting [website](#) was published in April 2017.

Disability: Software provider Electric Paper states it orientates itself on the "Web Content Accessibility Guidelines" (WCAG 2.0), which in turn are based on national guidelines (such as BITV or ADA Section 508). From a technical point of view, the presentation of online surveys is barrier free in accordance with the strict guidelines of the WCAG 2.0 Level AA and was certified for this by a neutral organization, the Swiss foundation "Access for All" As part of the Electric Paper quality management, the graphical interface of the complete system is tested for Web accessibility using suitable tools such as "WAVE"

We conducted accessibility testing of the admin and the student applications and on the whole the application was accessible in line with the Web Content Accessibility Guidelines Version 2 AA standard.

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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.

We identified the following improvements:

- Add visual labels for radial buttons
- Add descriptions for radial buttons for screen readers

It was planned to address this by exploring options to implement these recommendations for the Semester 2 2016/17 cycle, however, development resource would be needed.

Reasonable adjustments can be made for those unable to complete the form online. This may mean on request providing the questionnaire in alternative formats or providing assistance to complete.

The questionnaire will be in English only but as all participants will be enrolled in Edinburgh University courses where English is the main teaching language we do not envisage this will create any disadvantage.

Some students are exempt from certain learning and teaching activities as part of their learning profile. The extent of the levels of such adjustments was considered as part of the development of the 'student engagement' questions and will continue to be monitored. The aim of monitoring is that, should there be a huge rise in levels of such adjustments (notionally more than 10% of the total student population that are invited to complete CEQs), questions relating to contribution and participation would be reconsidered. Individual student's responses and adjustments will not be linked because CEQs are completed anonymously. Any 'student engagement' question developed at University-level which relate to participation or contribution will include a 'not applicable' or equivalent option. If Schools develop similar questions for their question set, they will be asked to include a 'not applicable' or equivalent option.

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

Course evaluation is not a new process in the University and bias, both conscious and unconscious, will have been manifest in previous course evaluation instruments used in different parts of the University. However current approaches to evaluation have not allowed the University to gather consistent or large scale data that would permit a robust evaluation of bias effects across the institution.

By collecting for the first time a large amount of data from a common question set across the institution, it will give the University much more opportunity than hitherto to identify structural biases, to mitigate these in course enhancement processes informed by course evaluation data, and to raise awareness of biases among students.

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

As engaged learners, students have responsibility for providing constructive feedback on their courses using Course Enhancement Questionnaires. Whilst students may provide critical feedback, they should ensure that it does not breach the University's Dignity and Respect Policy.

A benchmarking exercise was undertaken and a group of staff worked to update CEQ-related student communications, with a particular focus on equality, diversity and unconscious bias. All forms of communication, other than the landing page of the online survey, were updated in early March 2017. Updated initial and reminder emails were used from 6 March and a [web presence](#) was created and published on 3 March. The landing page will be updated over summer 2017. In addition, online unconscious bias training for students is being developed for implementation in 2017/18.

The '[How should Course Enhancement Questionnaire data be used](#)' page of the Data Matters website contains a section on taking account of possible bias (conscious or unconscious). CEQ report cover sheets and emails sent to staff with semester 2 results referenced the Data Matters website (June 2017).

There has been regular contact between Student Surveys and key stakeholders throughout academic session 2016/17. Two incidences of inappropriate comments and responses have been reported to Student Surveys. In addition, staff have been asked (via a survey to key stakeholders in July August 2017) about instances of inappropriate comments identified in CEQs. The vast majority of respondents are not aware of any instances.

It was anticipated that analysis would be undertaken to identify what, and how, changes could be made to the EvaSys software which would change the way anonymity of students is ensured. The way the system is currently configured is in line with the suppliers set-up and standard across UK institutions using the system. However, analysis would identify if changes can be made in the system which would enable the identification of a student who breaches the Dignity & Respect Policy. Currently the survey is completed anonymously so this would be a major change to existing Policy and practice. At its meeting in August 2017, the Course Enhancement Questionnaire Review Task Group considered evidence (the outcomes of a staff survey) which showed that awareness of instances of inappropriate comments identified in Course Enhancement Questionnaires was very low.

- **If the policy/practice contributes to advancing equality of opportunity<sup>2</sup>**

Potentially, through the continued analysis of data for evidence of gender bias. The Policy ensures a consistent approach is taken to CEQs.

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

Potentially, through the continued analysis of data for evidence of gender bias.

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

There is no evidence that the Policy and core question set create any barriers for other groups.

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

The Data Matters website is the primary source of information for colleagues and holds information on the policy, question set, links to unconscious bias training and materials available to promote the surveys with students. The Course Enhancement Questionnaire pages of the Data Matters website were referenced in key communications, a staff news item, and CEQ report cover sheets and emails sent to staff with semester 2 results (June 2017). A link to the Data Matters website has been added to the Policy. Staff survey results show that around half of respondents are aware of the website. Furthermore, Student Systems are working with School staff to create blogs on how staff have used CEQ data.

The primary method of communication with students is through email when invited to participate in the survey. Student initial and reminder emails contain the following paragraph: *We encourage you to be aware of the potential for bias in the completion of these questionnaires, so we have developed a short section on the Student website which may be a helpful introduction for you: <http://edin.ac/2mNQT6b> You also have a responsibility to*

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

provide feedback in a manner which does not breach the University's Dignity and Respect Policy: <http://edin.ac/1Cq0VZY>

This may mean on request providing information in alternative formats.

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

The roll-out of the new common course evaluation system was marked by extensive consultation and the development for the first time of an agreed policy that sets out how the data gathered will be used, handled and shared.

The development of the core question set was the subject of extensive discussion and consultation including discussion by the Board, feedback from Schools, consideration by a student panel, use of a panel of academic colleagues over the summer of 2016 and final review and approval by the Quality Assurance Committee. In addition the draft policy and/or draft question set have been presented for discussion at the People Committee, the Central Management Group, the Knowledge Strategy Committee, the Senate Symposium and the CHSS and CMVM Learning & Teaching Committees. The Board which oversaw the roll-out was sponsored by Jane Norman, Vice-Principal People & Culture.

The Data Analysis Group had Athena SWAN Network and Advancing Gender Equality Steering Group representation and two of the Staff Guidance Group members were also members of the Advancing Gender Equality Steering Group. The CEQ Review Group has Athena SWAN Network representation.

- **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 further points.

#### **ACTIONS FROM IDENTIFIED IN FEBRUARY 2017 EqIA:**

- A commitment has been made to analyse the data collected through the staff question sets in Semester 1 to explore for evidence of bias (initially in relation to gender) and for this to inform guidance on how data should be interpreted by colleagues and any necessary amendments to the question set. See above.
- A commitment to enhance communications to students particularly in relation to the purpose of the questionnaires, how the data is used, the Dignity & Respect policy and raise awareness of bias. See above.
- A commitment to ensure communications issued to staff when course evaluation reports are issued highlight, amongst other points, Equality & Diversity issues. In addition, the opportunity will be taken to reinforce a key point from the policy (point 2) that while these questionnaires are a rich source of information, they should also be seen in the wider context of other information, including external examiner reports, staff judgement and University level surveys. See above and the CEQ-related pages of the Data Matters website emphasise that CEQ data should not be used in isolation and reference other sources of data. Similar messages were communicated in emails from Barry Neilson to Heads of School in December 2016 and March 2017 and in CEQ report cover sheets and emails sent to staff with semester 2 results (June 2017).
- Review and amend the group which will support the analysis of semester 1 data and further development of communication and guidance to staff and students and invite involvement from a wider group of colleagues with equality remits. See 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 3:** Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified

#### **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).

- Continue to promote and monitor usage of the student and staff CEQ website resources.
- Promote the student online unconscious bias training, encourage students to complete it, and monitor usage.
- Continue to analyse staff gender data (on an annual basis from October 2018)
- The Student Survey Unit will remain in close contact with colleagues in Schools to log any examples of inappropriate comments and responses from students which breach the University's Dignity and Respect Policy.
- Development resource is needed for the radial buttons work.
- Monitor levels of students with adjustments which relate to participation or contribution.
- Ensure that 'student engagement' questions developed at University-level which relate to participation or contribution include a 'not applicable' or equivalent option and ask Schools that develop similar questions to do the same.

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

August 2018

#### **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 Barry Neilson, Director of Student Systems and Service Excellence Programme Lead.

Accepted by (name):  
Professor Jane Norman, Vice Principal, People and Culture

Date: 21/09/2017

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