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):

blogs.ed.ac.uk is a new part of the Academic Blogging Service, based on WordPress. WordPress is an open-source blogging platform. We are hosting our own instance of WordPress and will make it available to staff and students to create blogs. The platform will support the learning, teaching and research activities of the institution and will be available to staff and students for any University related business or work, including publicising research and teaching, learning and assessment.

The new platform will be available as a standalone platform, or integrated with the University's centrally supported Virtual Learning Environments (VLEs), Learn and Moodle.

It is anticipated that demand for this new service will be high, and that blogs that are delivered via this service will be viewed by a significant number of people around the world every day. The University provides some blogging tools currently but they tend to be focussed on a specific type of blogging purpose (such as assessed blogs through the built-in VLE blogging tools or with our ePortfolio tool). They are often not available outside of the VLE or University. Most public blogging happens via a plethora of locally installed WordPress sites (IS, College and School provided) or in external blogging services (such as WordPress.com or installs on external hosting services).

You can find out more about the Academic Blogging Service on the Service web page: https://www.ed.ac.uk/information-services/learning-technology/blogging

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

- **Proposed new policy/practice**

C. Person responsible for the policy area or practice:

Name: **Anne-Marie Scott**

Job title: **Deputy Director**

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

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

The new blog platform could have the potential to impact on all 9 protected characteristics as a large proportion of the blogs will be publicly available, however it is more likely that disability and race will have the most potential to be impacted.

There is a potential impact on disability. Web applications and sites should always be designed with accessibility in mind from the start. Best practice for accessible design often improves a site's general usability and makes it more accessible in general. The platform has been tested for accessibility by the Universities Disability Information Officer to ascertain its compliance with the latest version of the University Web Accessibility Policy which is based on the Web Content Accessibility Guidelines AA standards, including compatibility with assistive technology.

Users of the service can add content as they wish (potentially giving no thought to accessibility) but best practice guidance will be available on the service documentation and will be touched-on in all training developed for the service.

The blogs.ed.ac.uk platform is a WordPress site which contains a limited selection of WordPress themes available for blog creators to choose from. The IS Disability Officer examined the platform and highlighted a few areas of concern which the project team have addressed in the following way:
- **The University branded EdGel theme has been thoroughly tested for accessibility. It has been set as the default theme for all new blogs when they are created.**
- **The service is based on open-source software and most of the themes are also open source and so may be less accessible than our EdGel theme. However, we've selected a number that have been audited by the WordPress community and categorised as being 'accessibility-ready' and we plan to**

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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.

add more of these themes during the second phase of the project. (**https://en-gb.wordpress.org/themes/tags/accessibility-ready/**)

- **We will be proactive in promoting accessibility. We have prepared thorough documentation to guide users on how to create accessible content which also covers some aspects of site theming. Our new training workshops also briefly touch on accessibility best-practice.**
- **In the second phase of the project, we plan to make a plug-in available which adds a number of accessibility features to WordPress (WP Accessibility - https://en-gb.wordpress.org/plugins/wp-accessibility/), for example, enforcement of alt attributes on images and the ability to add long descriptions to images.**
- **We are linking to the University's accessibility statement from the footer of the blogging platform, which means the link is available throughout the platform.**
- **Site users can request that a blog or post is provided in an alternative format. This is covered in the accessibility statement.**
- **If a user is having problems viewing a post or page, due to some accessibility difficulty, they can report the page using a form which is available from the footer of each page on the site. When a page is reported, it will be investigated and if the issue is an accessibility one, it will be discussed with the blog owner, with some possible amendments/solutions suggested.**

There is a potential impact on race as blog pages will mostly be written in English however this is the main teaching language of the University and users will be able to use their browser settings to translate the page contents. We are aware that in some countries certain websites may be blocked but at present we do not envisage this will be an issue with these pages but will continue to monitor this.

All content added to a blog must not discriminate against any of the protected characteristics. Any content that was found to discriminate against any of the protected characteristics could result in severe disciplinary action as set out in the University computing regulations, the blogging 'Take down policy' and the Academic Blogging Service Terms of Use. We are providing a 'Report this page' feature on the blog site, and any reported pages will be investigated fully in accordance with these policies.

The team has also considered the impact of the platform on other categories of protected characteristics. Users of the platform could use their blog to reveal personal information, for example. Ultimately, this is the users choice, however, we are mitigating the risk of this occurring accidentally by:

- **Setting the blog to private by default so that all information is protected straight away. The action to make a blog public would require a conscious decision.**
- **In our training and documentation, we'll provide advice on what to keep private and what to make public.**
- **In our training and documentation, we'll refer users to advice on managing their digital footprint.**
- **It is also possible to restrict access to a blog or a post so that only EASE authenticated users have access.**

Add notes against the following applicable statements:

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

There will be the expectation from some disabled users that the system complies with the recognised accessibility standards (Web Content Accessibility Guidelines AA standard) and be compatible with various forms of assistive technology.

The Disability Information Officer has conducted a full accessibility audit of the Blog platform, the results of which we have implemented as far as was possible.

We have consulted with EUSA, Edinburgh Global, the University's Chaplaincy and the Student Disability Service to seek their views and have had positive feedback or no concerns from all.

- 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 but will monitor all feedback and suggestions for any positive or negative issues relating to any of the 9 protected characteristics.

- 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 use of the Blog platform will result in any form of prohibited conduct. All content creators will have consented to the Terms of use which prohibit content which is discriminatory, any such content can be reported via the 'Report a page' form (which will be accessible from any page on the blogs.ed service), any reported content will be dealt with in accordance with computing regulations and our Take down Policy .

We will ensure the system is as accessible as possible but will also ensure reasonable adjustments are in place so that no disabled user experiences less favourable treatment if they are unable to use the system. If blog pages were not accessible to a user, we would do our best to resolve the issue and if this was not possible we would provide them in another format.

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

The Blog platform looks to enhance equality of opportunity by offering 24 hour access to information provided on the site, or assessment activities that may not otherwise be available remotely or in other time zones. The service could be used to support students on-campus and those studying at distance thereby potentially having a positive impact on race and disabled students and those with parental/caring responsibilities who may wish to access information out-with standard working hours. There is also the opportunity for the blogs to be used to promote discussion around equality and diversity issues in general.

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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:

The Blogging platform offers the potential to enable greater communication between staff and students, and also the wider community as a conduit to provide less formal information on University activity and research projects. There is the capability for discussions to be shared to all and responded to. The nature of this communication means that the information shared is persistent and accessible at any time asynchronously. The Blog platform also has the potential to act as a collaborative tool for group/peer work and as stated above be used as a platform for issues around equality and diversity to be discussed and publicised.

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

All staff and students of the University have free 24 access to IT facilities and members of the general public in the UK have on the whole free access to IT facilities through local libraries so those on low incomes should not be disadvantaged. Although we recognise that those on low incomes elsewhere in the world and external to the University may not have access to free IT facilities and this may prevent them from accessing the blogs, however as the blogs will be of most interest on the whole to staff and students of the University it is not envisaged that this will create significant disadvantage.

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

Information about accessibility will be made available via the site footer section of all blog sites which will link to information on the supporting accessibility webpages that are hosted by the University of Edinburgh. The University webpages are governed by the Web Accessibility Policy which is based on the latest version of the Web Content Accessibility Guidelines AA standards.

Documentation specifically highlighting accessibility best-practice will be available alongside other blogging documentation. Face-to-face training and workshops will cover the basics of accessibility.

Information about the service will be provided in alternative formats free of charge on request for reasons related to a disability.

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

The Disability Information Officer has been asked to comment on the EqIA. We've also sought feedback from the Student Disability Service, EUSA, Edinburgh Global and the University Chaplaincy. All feedback received has been positive or raised no concerns.

All feedback and comments will be monitored for any positive or negative impacts on any of the 9 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:

We will continue to promote accessibility as being a key part of the blogging platform and will test all upgrades for accessibility which we feel will continue to demonstrate the seriousness by which Edinburgh University takes the issues of Equality and Diversity and in particular the needs of disabled users and the desire to make the applications they use as accessible as possible and to mainstream as many adjustments as far as possible.

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 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).

   - **Add more of the 'accessibility-ready' themes during the second phase of the project. (https://en-gb.wordpress.org/themes/tags/accessibility-ready/). We will be proactive in promoting accessibility.**

   - **Distribution of documentation to guide users on how to create accessible content which also covers some aspects of site theming.**

   - **In the second phase of the project, we plan to make a plug-in available which adds a number of accessibility features to WordPress (WP Accessibility - https://en-gb.wordpress.org/plugins/wp-accessibility/), for example, enforcement of alt attributes on images and the ability to add long descriptions to images.**

   - **Remind staff of the need to provide reasonable adjustments and documents in alternative formats free of charge in request**

   - **Monitor and review all feedback for any positive or negative comments related to the nine protected characteristics.**

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

   When there is either a significant change to the blogs.ed.ac.uk platform or when we receive any positive or negative feedback related to any of the nine 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)):

Mark Findlay, Service Manager, Technology Enhanced Team Manager, Digital Learning Applications and Media, Information Services

Karen Howie, Technology Enhanced Team Manager, Digital Learning Applications and Media, Information Services

Accepted by (name): **Anne Marie Scott, Deputy Director, Learning Teaching & Web Services, Information Services**

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

Date: **21/09/2018**

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