Last reviewed: 13/07/2023

Equality Impact Assessment – Zoom

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):

Zoom Video Communications

Zoom is a video conferencing and collaboration tool intended for non-teaching use. The University has purchased a paid Education Specific Licence for immediate implementation as an Information Services-provided service. This sitewide service will provide secure access to all members of faculty, staff and students. Zoom is for internal use and collaboration externally, especially in cases where the external participants need or are set up accordingly.

Update 2022

A new feature and update have been made to Zoom

- Change to allow users to turn on authentication in their Zoom meetings this change means that users can select an option to only allow meeting invitees who have signed into Zoom to access their meetings. The reason for this change is to help to ensure that University of Edinburgh user's Zoom meetings are as secure as possible. This change in allowing users to only accept authenticated users to their Zoom meeting, will help to prevent potential data loss and mitigate the risk of Zoom bombing (uninvited users who join Zoom meetings to cause problems). Feedback from users at the University, particularly users who may be sharing confidential data during their Zoom meetings, has requested that we make this feature available for the reasons given above. We propose to implement this change in response to that user feedback. This feature will not be on by default and users will have to turn on the feature themselves. The feature will be off by default, to ensure that users who host meetings with external users who may not have Zoom accounts are not adversely affected by the change.
- Auto-generated live captioning is now available in Zoom users can turn on the auto-generated live captioning in their Zoom meetings. This will allow meeting attendees to view captions.
- **B.** Reason for Equality Impact Asessment (Mark **yes** against the applicable reason):
 - Proposed new policy/practice
 - Proposed change to an existing policy/practice
 - Undertaking a review of an existing policy/practice YES
 - Other (please state):

C. Person responsible for the policy area or practice:

Name: Alex Carter

Job title: Head of Service Management

School/service/unit: 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 EgIA? 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 partnership¹

The Zoom service as an online service, has the potential to affect all staff and students and therefore may impact on all nine protected characteristics.

The protected characteristic of disability may have the greatest impact by the implementation of Zoom. As Zoom is an online service it will need to be accessible in line with the Web Content Accessibility Guidelines 2.1 AA standard, including being able to work with assistive technology. The assistive technology includes voice recognition software, screen readers or screen magnification software. Reasonable adjustments will need to be in place should a disabled user prove unable to use the system and we were unable to rectify it. The meeting recording feature of Zoom may have an effect on disabled users, particularly those with social anxiety. To mitigate this we provide quidance for users ("Guiding Principle -Recording of Online and Digital Events") who record online meetings, explaining that they must inform all participants of the intention to record beforehand, who they will be sharing this recording with, and allow participants to opt out of recording if they are uncomfortable. Zoom also has the option to add live captioning, however this captioning is not autogenerated within Zoom. If participants requested captions a participant in the meeting would either have to type the captions or a third-party captioning software could be purchased and

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.

linked with Zoom to provide these captions. We would make these adjustments if a disabled user were unable to use Zoom because they needed these captions.

The implementation of Zoom may also negatively impact the protected characteristic of race (specifically users whose first language is not English), because the default language for the program will be English. The main teaching language at the University of Edinburgh is English, therefore we do not envisage any disadvantage, and by the fact that users will be able to change their language settings from English to 8 other languages fairly easily. In addition, we were made aware there may be a potential impact on the protected characteristic of Race due to an algorithm used in Zoom for facial recognition which may fail to recognise black and ethnic minority faces. We have conducted consultation and testing with the University Edinburgh Race Equality Network and Black and Ethnic Minority staff and this has lead us to conclude that the issue with Zoom backgrounds is actually in a setting applying green screens and this happens irrespective of skin tone. Guidance will cover when appropriate to use the green screen option. Zoom may have a positive impact on the protected characteristic of race, specifically for users in China as the business version of Zoom is not blocked in China, unlike other platforms at the University (Teams and Teams Live Events). The implementation of Zoom may also be positive for users in other countries, as many users at the University have stated they have issues using other University platforms (Teams) for meetings with users in certain countries, but they do not have these issues with Zoom.

The implementation of Zoom may negatively impact the protected characteristic of religion because of the meeting recording feature. This is because some religions prohibit the video recording or photography of individuals. Therefore, our "Guiding Principles – recording of online and digital events" guidance will need to be provided for hosts/co-hosts on telling people they are being recorded, preferably ahead of time.

Implementing Zoom may positively impact several of the protected characteristics. The fact that Zoom will be available for users 24 hours a day 7 days a week, as well as providing users with another platform to have meetings from home, could positively impact users with parental and caring responsibilities (people who need a more flexible way of working), some disabled users, and those who observe and adhere to specific times of religious observance.

Any content added to Zoom by users should not discriminate against any of the protected characteristics, and any content found to discriminate would result in disciplinary action.

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.

Update 2022:

The change to allow users to turn on authentication in their Zoom meetings has the potential to affect all 9 protected characteristics, as all staff and students will be able to turn on this feature for their meetings. Potentially all staff and students may also be affected if they attend a Zoom meeting for which this feature is enabled.

However, we feel that the protected characteristic of disability may be particularly affected. As the feature is not on by default, disabled users, particularly those who have certain learning differences, may take time to learn how use the feature. Should a disabled user want to use this feature but find they are unable to, due to it being off by default, we will attempt to turn the feature on for that user or provide further guidance and help. If a user tries to join a meeting which has authentication enabled, without being signed into Zoom, they will see an error message. Disabled users, who are invitees to Zoom meetings for which the feature is enabled may also take time to get used to seeing this error message if they are not logged in. The error message shown in the desktop version of Zoom is clear on what users should do when they see the message, telling the user to "Sign in to join". However, the desktop version of Zoom's error message is less clear and could be confusing for some users. This message states "to join sign into the account that received an invitation." We will send feedback to Zoom to ask them to make this message clearer. We will provide guidance to meeting organisers on our Zoom Webpages on the University website - https://www.ed.ac.uk/zoom. This guidance will ask organiser to let their attendees know that they must sign in, if the organiser has turned on this feature. Should a disabled user find this feature makes joining Zoom meetings more difficult for them, and makes them unable to use the system, they can contact IS Helpline and we will request that the meeting organiser consider switching off this feature in their meetings with that user.

The new feature of auto-generated live captioning in Zoom, has the potential to affect all 9 protected characteristics as all staff and students will be able to turn on this feature for their meetings. All staff and students will also be able to use live captions in Zoom, if the meeting organiser turns this feature on.

However, we feel that the protected characteristic of disability and race may be particularly affected. The protected characteristic of disability may be affected by the new auto-generated captioning feature in Zoom. Previously captions in Zoom had to be typed by a user or generated by a third party. This can be expensive and may not have been available for all Zoom meetings. Auto-generated captions will be available in all meetings as long as the meeting organiser has enabled them in their settings, and a user can turn them on at any time.

Notes against the following applicable statements:

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

We know that Zoom must be as accessible for disabled users as possible, in adherence with the Web Content Accessibility Guidelines 2.1 AA standard, The Disability Information Officer for Information Services has tested the application for accessibility and issues have been fed back to the supplier. Zoom themselves provide information on the service's accessibility and describe that it is compatible with common screen readers and can be used with keyboard commands. Zoom allows for captioning of meetings, however this captioning must be either typed by a participant in the meeting or a third party captioning service must be linked. If any user required these adjustments to be made, we would make these adjustments.

Users whose first language is not English may find the option to change the default language from English to their native language although English is the main teaching language of the University. Zoom offers the ability to do this and there are

currently 8 other languages available which may have a positive benefit on the protected characteristic of race. We have conducted consultation and testing with the University Edinburgh Race Equality Network and Black and Ethnic minority staff around the use of backgrounds as described above and below.

Users who live in any of the countries where Zoom is blocked may need to have alternative arrangements supplied if they request this. The current countries where Zoom is not available are Cuba, Iran, Democratic People's Republic of Korea, Sudan, and Syria due to US sanctions. Zoom for business is not blocked in China, and therefore users in China can use Zoom as an alternative to Teams which is blocked in China.

 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 evidence to proceed.

• 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 implementation of Zoom will lead to any form of prohibited conduct for the reasons detailed above and below. Where a user was unable to use Zoom for any reason, we would put in place reasonable adjustments where possible to ensure no user was disadvantaged.

• If the policy/practice contributes to advancing equality of opportunity²

Zoom could contribute to advancing equality of opportunity, alongside the other online communication platforms used by the University, by allowing for users to access ways to meet and communicate with colleagues, and particularly external collaborators, 24 hours a day 7 days a week from home. This could advance equality of opportunity for people with caring responsibilities, as well as for users who have certain disabilities. Zoom may advance equality of opportunity for users working in or working with users in China (as well as other countries which have issues accessing Teams) as Zoom for business is not blocked in China, making it an alternative to Teams for users at the University.

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

Zoom has been introduced as a service in response to claims that none of the existing video communications platforms can fulfil all user requirements. This is particularly for staff working in and with users from other countries who have expressed issues with accessing and using Teams. This means that applying Zoom as a service has the possibility to foster good relations among the protected characteristic of race, specifically with those from other countries. We hope this demonstrates the commitment Information Services and the University has to Equality and Diversity.

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

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

The implementation of Zoom should not create barriers for any other groups. However, there is a possibility that people with lower incomes may not have personal access to IT devices (laptop/smartphone/desktop) from which to use Zoom. Staff and students normally have free 24/7 access to free computing facilities but due to the Covid-19 pandemic we currently have had to closes some of our buildings. But we are opening access to these as soon as it is safe to do so and with new COVID protection measures in place. We are working to open these as soon as possible when it is safe to do so.

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

Communication on Zoom and help and support for using Zoom is available on the Zoom webpages on the University of Edinburgh website. The webpages are part of the University website and were therefore created following the University Web Accessibility Policy (in accordance with level AA, 2.1 standard, of the W3C version of the Web Content Accessibility Guidelines). In accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 and accessibility statement has been added to this website. If users want the information on these webpages in an alternative format, they can request this free of charge: Users can also request any other information about the service in alternative formats. Users can also request help with Zoom from the IS Helpline by using the online forms: IS Helpline Online forms.

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

We have identified and consulted with key stakeholders, and will continue to work with these stakeholders, and other relevant groups, to monitor and review the Zoom Video Communications service. We will monitor all feedback for any comments (positive and / or negative) related to any of the nine protected characteristics. If the service is changed, then accessibility testing will be conducted again. We have also discussed the change with the Information Services Disability Information team.

 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 what has been mentioned 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 1: No change required – the assessment is that the policy/practice is/will be robust.

For the reasons detailed above and below

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).

We will continue to monitor feedback on Zoom within the University for any impact, positive or negative, on any of the protected characteristics and act accordingly. Users of Zoom and those recording online meetings within the University will be reminded of the need to make reasonable adjustments where applicable and to provide information about Zoom in alternative formats upon request.

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

The EQIA will be reviewed when there are any changes, when we receive any feedback positive or negative 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)):

Eilidh MacLeod, Messaging Service Assistant, Information Services

Accepted by (name): Alex Carter, Head of Service Management, Information Services

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

Date: 09/2020

Update 2023:

EqIA undertaken by (name(s) and job title(s)):

Sharon Chen, Online and Digital Events Service Assistant, Service Management, Information Services Group

Accepted by (name): Alex Carter, Head of Service Management, Applications Directorate, Information Services Group

Date: **07/2023**

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