



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): **Information Security Policy**

Sets out the University of Edinburgh's approach to information security risk management. The Policy, which forms an integral part of the overall Information Security Framework, is in place to support the strategic vision of the University and to facilitate the protection of the University's information assets and technology services against compromise of their confidentiality, integrity or availability. Whilst doing this, it recognises the ability to discover, develop and share knowledge must be maintained.

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: **Alistair Fenemore**

Job title: **Chief Information Security Officer**

School/service/unit: **Information Security, 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)

- age
- disability

- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership¹

The Information Security Policy and Security Framework applies to anyone who accesses University information assets or technology by any means from any location. This is all staff, contractors, visitors, consultants and any third parties engaged to support University activity and who have any authorised access to any University information assets, as well as students and alumni. Therefore, the policy has the potential to affect a wide-ranging and large number of people, and therefore may impact on all nine protected characteristics. The Policy is supplemented with a number of additional policies and guidance such as the Computing Acceptable Use Policy, the Computing Sustainability Policy or potentially some of the referenced Information Security Standards).

However, the protected characteristic of disability may have the greatest impact, as this principally relates to accessing policy information online through the use of an electronic device (either desktop, laptop, tablet or mobile) via the University Policy Directory. The Policy Directory holds an [Accessibility Statement](#), as per The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. The Directory is designed to be accessible as far as possible in line with the Web Content Accessibility Guidelines (WCAG) 2.2 AA standard, including compatibility with assistive technology such as voice recognition software, screen readers or screen magnification software. Reasonable adjustments will need to be in place should a disabled user be unable to use the Directory, and that we were unable to rectify. The policy states that all users in scope need to undertake information security awareness training; the main mechanism for this is interactive online training so as required by the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 it has been tested for accessibility in line with the Web Content Accessibility Guidelines 2.2 AA standards and an accessibility statement published. Alternatives to the online training are available, including non-interactive video and in-person awareness sessions.

Another significant consideration of the policy is race, whereby it is written in English, which is mitigated by the fact that the main teaching language of the University is also English. There is a potential positive effect in that by providing the guidance online, users can access the information and subsequently use browser translation tools to convert to their preferred language.

The policy states “It should be noted that it is imperative that all information is protected from compromise of confidentiality, integrity and availability” and further information is provided via guidance and standards to ensure individual information and information about protected characteristics is protected and kept confidential.

The University vision involves a continuing commitment to equality, diversity and inclusion for both students and staff. The University has a single [Equality Strategy](#) to ensure that equality, diversity and inclusion are guiding principles in our pursuit of academic excellence.

Add notes against the following applicable statements:

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.

- On any available information about the needs of relevant equality groups:
The University committee process provided an avenue for consultation, whereby the University Senior Leadership Team (SLT), IT Committee (ITC) and Knowledge Strategy Committee (KSC) deliberated over the content of the policy. The bodies involved with consultation will welcome feedback and suggestions on an ongoing basis. The Disability Information Team for the University have also reviewed the EqIA. Furthermore, we will monitor all feedback for any comments, positive or negative, related to any of the nine protected characteristics and act accordingly.

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

At this stage, it is felt 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 the policy will lead to any form of prohibited conduct for the reasons detailed above and below. Moreover, a review of the policy will be continually undertaken, whereby all feedback, positive or negative, related to any of the nine protected characteristics will be appraised and acted on accordingly. Should disabled users prove unable to access the directory that hosts the policy, and we were also unable to rectify this issue, reasonable adjustments would be put in place. This could include provision of the information in alternative formats, which would be free of charge to the user and given upon request. All users in scope are required to meet the requirements of this policy but the policy itself does not specify methods; as such there is flexibility and local autonomy in how those requirements can be met allowing for a range of reasonable adjustments.

- If the policy/practice contributes to advancing equality of opportunity²
The publication of the policy might positively affect a number of groups, due to this being free, online and available 24 / 7. As a result, this might help those who adhere to certain times of religious observance, in addition to the protected characteristic of pregnancy and maternity / holding caring responsibilities, alongside disabled users. By examining the potential positive and negative impacts of all the protected characteristics, it is hoped that this demonstrates the University's commitment to equality, diversity and inclusion, specifically through enhancing equality of opportunity.

- If there is an opportunity in applying this policy/practice to foster good relations:
It is hoped that by considering impacts, positive and negative, on all the protected characteristics via the publication of the policy, and subsequently this EqIA, we are showing that the University is committed to equality, diversity and inclusion. We have considered ways to mitigate and provide support and information to users in these groups.

- If the policy/practice create any barriers for any other groups?
The policy has been published on the University Policy Directory. Therefore, this has the potential to impact users with socioeconomic considerations and lower incomes, since this is predicated on accessing the internet via IT equipment (desktop, laptop, tablet and / or mobile device). However, all staff and students have free, 24 / 7 IT facilities at the University, principally at the George Square Main Library. IT facilities are also provided at other campuses across Edinburgh. Public libraries in the UK also facilitate free access to the internet. Finally, other countries have similar options available.

- How the communication of the policy/practice is made accessible to all groups, if relevant?
The policy is available to view on the University of Edinburgh Policy Directory. The Directory holds an [Accessibility Statement](#), as per The Public Sector Bodies (Websites and Mobile

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

Applications) (No. 2) Accessibility Regulations 2018. The Directory is designed to be accessible as far as possible in line with the Web Content Accessibility Guidelines (WCAG) 2.2 AA standard, including compatibility with assistive technology such as voice recognition software, screen readers or screen magnification software. Reasonable adjustments will need to be in place should a disabled user be unable to use the Directory, and that we were unable to rectify. Any and all information will also be available in alternative formats for disabled users, free of charge, upon request.

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

The policy was developed through the University committee process, including but not limited to the University Senior Leadership Team (SLT), IT Committee (ITC) and Knowledge Strategy Committee (KSC). The relevant directorate, the Information Security team based in Information Services Group, underpins the values represented within the policy. All of the bodies mentioned will welcome feedback and suggestions on an ongoing basis. Furthermore, we will monitor all feedback for any comments, positive or negative, related to any of the nine protected characteristics and act accordingly. Should we receive any negative feedback, we will take all appropriate steps to resolve the issue and work towards updating users. The Policy Is reviewed every 12 months and updates made in line with the University 'Policy for the Governance and Publication of University Policies' ([Policy for Policy management](#)). Non-substantive changes will be signed off by CISO as policy owner, with any other changes following approved governance path for review and sign off any significant changes will result in the EqIA being updated.

- 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 and below.

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 listed above and below.

~~**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.~~

~~**Option 3:** Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified~~

~~**Option 4:** Stop the policy or practice as there are adverse effects cannot be prevented/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).

We will monitor all feedback for any comments, positive or negative, related to any of the nine protected characteristics and act accordingly. We will also advise staff of the need to make reasonable adjustments where appropriate, including providing information in alternative formats, free of charge, upon request.

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

The Policy is reviewed every 12 months and updates made in line with the University 'Policy for the Governance and Publication of University Policies' ([Policy for Policy management](#)). Non-substantive changes will be signed off by CISO as policy owner, with any other changes following approved governance path for review and sign off any significant changes will result in the EqlA being updated. A review shall take place if there are any significant changes to the policy, in addition to receiving any 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:

I. Sign-off

EqlA undertaken by (name(s) and job title(s)): **Angus Rae, Senior Information Security Officer, Information Security, Information Services Group**

Accepted by (name): **Alistair Fenemore, Chief Information Security Officer**

School/service/unit: **Information Security, Information Services Group**

Date: 03rd Feb 2025

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