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

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 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 Moodle Virtual Learning Environment (VLE) from version 2.6 to version 2.8. This VLE is being used for teaching within some Online Distance Education programmes.** **Update(2018): Upgrade of the Moodle Virtual Learning Environment (VLE) from version 3.2 to 3.4. Moodle is used for teaching some of the online distance postgraduate programmes.**
B. Reason for screening (delete as applicable): • **Proposed change to an existing policy/practice**   **Update (2018): Proposed change to an existing policy/practice.**
C. Person responsible for the policy area or practice: Name: **Mark Wetton** **Update (2018) Anne-Marie Scott** Job title: **Head of Educational Design & Engagement** **Update (2018) Deputy Director, Learning Teaching & Web Division** School/service/unit: **Learning Teaching & Web Services 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. **An EqIA will be carried out to identify any possible positive or negative impacts on any of the 9 protected characteristics. The Moodle upgrade affects ~500 students. A Moodle upgrade project is planned annually, and a review of the EqIA should be included with each upgrade project.** **Update (2018) This is the review of the EqIA following the upgrade of the Moodle VLE.**

F. Sign-off

Screening undertaken by: **Mark Findlay, Service Manager, Digital Learning Applications & Media**
Update (2018) Steph Hay, Service Manager, Digital Learning Applications & Media

Accepted by (name): **Mark Wetton**
Update (2018) Anne-Marie Scott, Deputy Director, Learning, Teaching & Web Services Division

Date: December 2018

If EqIA is not being carried out, delete the remainder of this form and send the completed form to 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 Moodle VLE is available to Online Distance Learning programmes only. There are 6 programmes currently using Moodle. This equates to 32 courses and 500 students using the system. However, it is worth noting that 4 new programmes will be using Moodle in the coming year, so number of courses and students will be higher than the current usage.

The planned upgrade will be released to users on 22rd July 2015. The main concern of this equality impact assessment is any potential impact on disabled users and the need of the system to be accessible to disabled users and compatible with assistive technology. The upgrade includes a new responsive theme, which works on all devices, and desktop machines. The layout and colour scheme of Moodle is similar to the previous version.

Update (2018)

Moodle has a small number of programmes that teach exclusively on Moodle making the VLE the main point of contact for students with the University. Moodle has been upgraded on the 10th of July 2018. A new theme was released with changes to the layout within Moodle. The main concern of this equality impact assessment is any potential impact on disabled users and the need of the system to be accessible to disabled users and compatible with assistive technology.

2. To which equality groups 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[1]

Moodle is used by a small number of online distance learning programmes; it is available to 500 students. Moodle is relevant to disabled users, who may rely on assistive technology to access resources and/or who require the system to meet current accessibility guidelines such as WCAG Version 2 AA standard. Moodle is only available in the English language, and therefore has a potential impact on the protected characteristic of Race but as English is the main teaching language of the University, we do not anticipate this to be an issue.

We do not envisage any positive or negative impact on any of the other protected characteristics but will monitor feedback from users in case any issues come to light.

All content added to the VLE 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

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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.

staff. The University has a single equality strategy to ensure that equality and diversity are guiding principles in our pursuit of academic excellence. The introduction of this strategy coincides with the implementation of the Equality Act 2010 and builds on its principle of integrating equality and diversity in policy and practice.

We also have a new University web accessibility policy which we feel will have a positive impact on the website and VLE's and help to ensure that content will be as accessible as possible to disabled users. There will continue to be a prominent feedback mechanism on every page. Staff at the University are aware of their obligation to provide reasonable adjustments when requested – e.g. content in an alternative format.

Update (2018):
The use of Moodle has increased since 2015 with more students using it and new courses being run on it. There has been no complaints or feedback about accessibility provided to the service team or about any of the nine protected characteristics.
We will continue to monitor feedback from users in case of any issues.

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 audit of the upgraded Moodle service and recommendations from this audit have been completed to a satisfactory level. The IS DIO will continue to review any further developments with the Moodle service which affect accessibility. In addition, any feedback from students regarding accessibility or any other equality issues will be considered and fed into future EqIAs and acted on accordingly.
   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 and act accordingly.

   Update (2018):
   As part of the upgrade project the IS DIO completed an accessibility evaluation on the upgraded version of Moodle. It was noted that this version of Moodle was broadly accessible and had improved on the previous report, some issues remained and will be taken forward by the Moodle Service team. These areas to follow up are:

* Look into whether an automatic spell- check function could be added to the all data entry boxes including the smaller ones.
* Add a tooltip to the University of Edinburgh logo
* Include a prompt so that users are reminded they should add subtitles when uploading audio visual content.
* Consider using a yellow outline to indicate to users where they have tabbed to rather than a dotted box to make it easier for users to tell where they are.
* Check and improve the colour contrasts as listed under question 3
* Ensure users are alerted when clicking on a link will open as a pop up.
* Make the link to the IS helpline clearer for the help pages and consider including a specialist accessibility advice section. Consider providing the help PDF's as Word documents as well.

These will be investigated by the Moodle Service team.

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?

   We do not envisage that this upgrade will lead to any form of prohibited conduct. All steps have been put in place to ensure the system upgrade is as accessible and compatible with assistive technology as possible to disabled users. The system is only available in English but as English is the main teaching language of the University and courses are offered in English we do not believe this will cause a disadvantage.

   Update (2018):
   We still do not envisage that this upgrade will lead to any form of prohibited conduct. All steps continue to be in place to ensure the system upgrade is as accessible and compatible with assistive technology as possible to disabled users. The IS DIO's feedback is being reviewed by the Moodle Service team and reasonable adjustments will be put in place for anything that we are unable to make accessible.
   There has been no feedback related to any of the nine protected characteristics.

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

   Digital Learning Applications and Educational Design & Engagement teams will publish information on the accessibility of the system in the Moodle Staff Help and Moodle Student Help courses within Moodle itself. Information Services will ensure that users are able to access all information that they require in an alternative format upon request. If any disabled student has problems regarding accessibility of the system all steps will be taken to remedy this or put in place reasonable adjustments in order to ensure the student experiences no disadvantage.
   Update (2018):
   The teams managing the Moodle Service will continue to make reasonable adjustments to ensure no student experiences disadvantage. There have been no requests for reasonable adjustments since the last upgrade of Moodle.

6. Does the policy/practice contribute to advancing equality of opportunity[2]? Will it help to:
   - remove or minimise disadvantage

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

- meet the needs of different equality groups
- encourage increased participation of particular groups
- take account of disabled people's impairments?

Creating an online system that is accessible to disabled users may ensure that those users unable to attend courses on campus are able to participate via an accessible online system. Full accessibility testing has been undertaken to ensure the system meets the needs of disabled users. This Moodle upgrade has improved accessibility than the previous version so hopefully this might lead to increased participation, reduce the need for reasonable adjustments and minimise any disadvantage.
Update (2018) – we have received no positive or negative feedback related to any of the 9 protected characteristics.

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[3]? Will it help to tackle prejudice and/or promote understanding?

This process has the potential of highlighting to schools the need to ensure that systems are accessible and that reasonable adjustments may need to be put 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.

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?

Disabled users may have different needs in terms that the system needs to be compatible with assistive software and hardware and to be as accessible as possible. We would not expect users to have an expectation that the information would be provided in different languages, as the main teaching language of the University is English.

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 (2018):
There is no evidence of a higher or lower uptake by any equality group. Moodle's use has dropped slightly but remains the primary VLE for a number of programmes.

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 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

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[3] This question does not apply to the protected characteristic of marriage or civil partnership.

should not be any disadvantage to users, on the basis of income, caused by IT systems.
Distance users may not have access due to distance to University facilities but users will need computer access to complete the online course. All communication regarding the upgrade and online help will be available in alternative formats on request. Disabled distance learners can contact the Student Disability Service who will be able to offer advice and assistance and we can provide a list of free assistive software which may be of use.
Update (2018):
There has been no positive or negative feedback related to any of the protected characteristics and no requests for reasonable adjustments.

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

The IS DIO will reviewing the accessibility of the system for disabled at any time there is an upgrade. In addition, all feedback will be monitored, and acted upon where possible to monitor whether there is any positive or negative impact on any of the protected characteristics.

Update (2018):
The Moodle Service Team received no negative or positive feedback relating to any of the 9 protected characteristics other than feedback from the IS DIO. Feedback will continued to be monitored and acted upon where possible.

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.

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

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

As described in the questions above, we have made changes to the upgrade to improve accessibility of Moodle for disabled users. Information Services will publish guidance on reasonable adjustments on the Information Services website and liaise with schools where specific requirements arise for a student

Update (2018)
Option 1 has been selected due to the reasons described in the previous questions. Changes have been made to the upgrade to improve the accessibility of Moodle and Information Services will continue to publish guidance on reasonable adjustments and liaise with appropriate areas within the University where specific requirements arise for a student.

I Action and Monitoring

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

Publish help advice for disabled users on the Moodle Staff Help Course and Student Help Courses within the Moodle VLE and ensure users are aware of their availability. Ensure all communications about the upgrade are available in alternative formats upon request.
Update (2018) The Moodle Service team will investigate implementing the recommendations made by the IS DIO and report on the outcomes.

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 monitor any positive negative impact on any of the 9 protected characteristics.
Update (2018):
The Moodle Service team will investigate implementing the recommendations made by the IS DIO and report on the outcomes and continue to monitor feedback for all positive or negative feedback related to any of the 9 protected characteristics.

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

The policy will next be reviewed when any changes are made to the system or when we receive any positive or negative feedback related to any of the 9 protected characteristics, at which time the EqIA will be updated and revised accordingly as well.
Update (2018):
The Moodle Service team will investigate implementing the recommendations made by the IS DIO and report on the outcomes. The EqIA will be reviewed when any changes are made to the system or when 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**

If No – please specify when it may be published or indicate restrictions that apply.

J. Sign-off

EqIA undertaken by (name(s) and job title(s)): **Mark Findlay, Service Manager, Digital**

Learning Applications & Media

Update (2018) Steph Hay, Service Manager, Digital Learning Applications & Media

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Accepted by (name): **Mark Wetton, Head of Educational Design & Engagement**

Date: **02nd September 2015**

Update (December 2018) Anne-Marie Scott, Deputy Director, Learning, Teaching & Web Services Division

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