



Equality Impact Assessment

A. Policy/Practice (name or brief description):

OneTrust is a centralized DPIA tool being used to identify and reduce the privacy risks of projects. It can reduce the risks of harm to individuals through the misuse of their personal information. It can also help to design more efficient and effective processes for handling personal data

A DPIA is:

- **A tool/process to assist organisations in identifying and minimising the privacy risks of new projects, systems or policies**
- **A type of impact assessment conducted by an organisation, auditing its own processes to see how these processes affect or might compromise the privacy of the individuals whose data it holds, collects, or processes**
- **A tool/process to assist organisations in ensuring that all activities involving personal data are proportionate and necessary**

A DPIA is designed to accomplish three goals:

- **Ensure compliance with applicable legal, regulatory, and policy requirements for privacy;**
- **Determine the risks and effects; and**
- **Evaluate protections and alternative processes to mitigate potential privacy risks**

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

C. Person responsible for the policy area or practice:

Name: **Irfan Khan**

Job title: **Service Manager (Enterprise Data)**

School/service/unit: **Applications Directorate, 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

All groups are potentially impacted by OneTrust as it is a service which could be available to many users across the University. However, we feel that the protected characteristics of disability, religion, and pregnancy/maternity are most likely to be impacted. OneTrust must be accessible to disabled users in line with the Web Content Accessibility Guidelines AA standards (<https://www.w3.org/TR/WCAG20/>) and compatible with assistive technology.

Training and guidance documentation is available primarily on the University website (EdWeb) and here - [Data protection impact assessments \(DPIAs\) | The University of Edinburgh](#), which adheres to the University Web Accessibility Policy based around the Web Content Accessibility Guidelines Version 2 AA standard as required by law. We will provide reasonable adjustments for disabled members of staff where required and additional formats etc. will be made available on request

There is the potential for positive impact for people with a disability, religious commitments, pregnancy and maternity (and thus people who are women), caring responsibilities, or who are living abroad. The 24/7 capabilities of OneTrust system allow people who are not able to work during regular office hours to access the service at their convenience. The OneTrust tool is available in English language

The data in reports created by OneTrust system is limited by university regulations on data protection, and all University employees must undergo data protection training. Staff are only able to view reports and data that they have been given access to. This practice mitigates any privacy concerns that may arise. Any staff member found to be creating reports that do not comport with the University's data protection policy (e.g., reports that might identify individuals with specific characteristics, which may lead to discriminatory behaviours) would be subject to the University disciplinary procedures

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups: **Users can submit complaints or comments about OneTrust via UniDesk, the University's incident logging and tracking tool. We have not received any diversity and equality complaints for OneTrust. The Information Services Disability Information Officer has tested the interface in accordance with the Web Content Accessibility Guidelines AA standard including checking the systems for compatibility with**

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.

assistive technology. Any areas for improvement have been noted and are dealt with accordingly.

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

We feel we have enough evidence to proceed. We will monitor feedback we collect for any positive and negative effects related to any of the nine protected characteristics.

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

We believe some people accessing or using the OneTrust tool will have access to the signpost data but not detailed information. The authorized staff have been/ will be provided with training and support to ensure they comply with the agreed privacy/security protocols.

The tool does not create barriers for any groups of staff as the access to personal information is limited and rigorously controlled

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

OneTrust is a SaaS service available 24 hours a day, 7 days a week via the web, from anywhere around the world. As such, the service will allow users with schedules that do not align with “regular” work hours of 9am-5pm GMT (whether due to pregnancy/maternity/caring responsibilities—and therefore sex—, disability, religious practice, or the fact that they are in a different time zone) to enjoy ease of access.

Furthermore, only people who are authenticated and authorized can access certain data. For example, people who have been assigned to complete a DPIA assessment for their service, people who are approvers or hold a responsibility towards the data in question, example – Data Owners, Data Steward, Data Analysts, Data Protection Officers, etc.

Generally, the data that is available to users is limited by University regulations on data protection, and all University employees must undergo data protection training. This practice mitigates any privacy concerns that may arise.

- If there is an opportunity in applying this policy/practice to foster good relations:
OneTrust can surely improve the quality and efficiency of how data is stored, processed and retained in various ways, being compliant with the General Data Protection Regulations will provide additional reassurance to employees that their personal information is being stored and managed securely

- If the policy/practice create any barriers for any other groups?
This policy should not create any barriers for any other groups, as it is simply an assessment tool for data protection. Authorized staff have access to free IT facilities 24 hours a day, which they could use to access OneTrust.

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

Detailed documentation and information will be available primarily on the University website (EdWeb), which adheres to the University Web Accessibility Policy based around the Web Content Accessibility Guidelines Version 2 AA standard as required by law. We will provide reasonable adjustments for disabled members of staff where required and additional formats etc. will be made available on request.

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

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

The Information Services Disability Information Officer has conducted an accessibility assessment on OneTrust. We will continue to monitor feedback and complaints for any positive or negative feedback. Users can submit any feedback via UniDesk, which the Service Manager for OneTrust will respond to directly. We plan to do another accessibility test if the system is changed significantly, or any system improvements evaluated with the data protection officers and any other related stakeholders.

- 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 further to what has been stated 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.

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 continue to review feedback/comments related to any of the 9 protected characteristics. We will also advise staff of the need to make reasonable adjustments where appropriate. Finally, we are committed to providing alternative formats upon request.

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

If there is a significant change (i.e. a software upgrade) or we receive any positive or negative feedback related to any 9 of the protected characteristics.

H. Publication of EqIA

Can this EqIA be published in full, now? Yes/~~No~~

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)):

Accepted by (name): Alex Carter

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

Date: 19/06/2023

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