THE UNIVERSITY of EDINBURGH

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):
QlikSense is a data visualisation tool. QlikSense allows users to connect to data sources they already have access to and create visual reports and dashboards to be shared.
Everyone with an ed.ac.uk mail address has access, though the ability to create and share is centrally controlled, requests made through Unidesk.

B. Reason for Equality Impact Asessment (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 **Susan Cooke**

Job title: Enterprise Data Systems (**EDS) Team Manager**

School/service/unit: **Applications Directorate, Information Services Group**

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
- religion or belief

- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership[1]

All groups are potentially impacted by QlikSense as it is a service which will be available all across the University. However, we feel that the protected characteristics of disability, religion, and pregnancy/maternity are most likely to be impacted. QlikSense must be accessible to disabled users in line with the Web Content Accessibility Guidelines 2.1 AA standards (https://www.w3.org/TR/WCAG20/) and compatible with assistive technology.

University specific documentation and training for ikSense is available online, and 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 2.1 AA standard as required by law. We will provide reasonable adjustments for disabled members of staff where required and alternative formats formats etc. will be made available on request.

External training is available online through video tutorials on Lynda.com (which is committed to Section 508 accessibility, a set of guidelines described in a US Federal law). Lynda.com is available to all University Staff and Students.

Content, in the form of reports and dashboards, will be created and shared by users themselves. We will ensure documentation regarding creating accessible content is made available to these users e.g. https://community.qlik.com/t5/Qlik-Product-Innovation-Blog/Qlik-Sense-Accessibility/ba-p/1463334 All content added 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 staff.

Screen reader tags helps those with visual impairments hear and interact with data and discoveries displayed on screen. Per the vendor, the QlikSense user interface (including menus, buttons, charts, and text) is enhanced with screen reader tags to offer a usable description, digitally read aloud by a recommended screen reader such as JAWS. Testing showed although much of the content was capable of being read by JAWS not all was and often it was impossible to navigate to the right area for JAWS to read the text without being able to see the screen and select an item. Visually impaired users may be limited in the value of a screen reader, as the purpose of the application is to create visual representatives of data. Graphically intense elements, such as complex visualizations, may be inherently less accessible, users have an option to flip any chart to a table view, where they can analyse and select individual data values. Users creating content will be encouraged to take this in to account and offer alterative formats when possible.

Keyboard Navigation is an essential element of accessibility. QlikSense keyboard navigation lets users traverse from the hub through sheets and objects, even making individual value selections. Global keyboard shortcuts are available and will be shared with users.

---

[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.

There is also 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 QlikSense allow people who are not able to work during regular office hours to access reports at their convenience. Additionally, the functionalities of QlikSense could assist the University in furthering its commitment to equality and diversity initiatives. For example, QlikSense could facilitate projects related to assessing the diversity of staff hires and the student body by analysing data on the current composition of staff and students to identify areas of underrepresentation.

The system is only available in English but as English is the main teaching language of the University we do not believe this will lead to any disadvantage.

The data in reports created by QlikSense 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 are able to submit complaints or comments about QlikSense via Unidesk, the University's incident logging and tracking tool. We have not received any diversity and equality complaints for QlikSense. We will continue to monitor all feedback for any comments positive or negative related to any of the 9 protected characteristics and act accordingly. The Information Services Disability Information Officer has tested the interface in accordance with the Web Content Accessibility Guidelines 2.1 AA standard including checking the systems for compatibility with assistive technology. Any areas for improvement have been noted and are dealt with accordingly. As this is a supplier designed product, some amendments to the design our out of the University's control, but we have fed out findings back to the supplier

- 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 do not believe that the use of QlikSense will lead to any form of prohibited conduct for the reasons stated above and below.

Overall, we have and will continue to strive to ensure that the system is as accessible as possible. Where we are unable to resolve an issue, we will make reasonable adjustments to ensure no disadvantage. For example, the University could provide one-to-one in-person assistance for users creating reports on QlikSense, or additional assistive technology more broadly for those who wish to view reports.

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

QlikSense is 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

---

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

align with "regular" work hours of 9am-5pm GMT (whether due to pregnancy/maternity/caring responsibilities—and therefore sex (as it has been that caring responsibilities fall disproportionally upon females)—, disability, religious practice, or the fact that they are in a different time zone) to enjoy ease of access.

Furthermore, only people with authorized access could view certain data. For example, reports created from student data related to protected characteristics stored by Student Services (and used for reports such as those that analyse the diversity of the student body) are only available to a limited audience. 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:

We hope that the use of QlikSense, which facilitates data organization and analysis, will enable more informed decision-making across the University. As a result, this will allow departments to deliver better customer service, and positively impact all parties involved in the University, including current students and staff as well as future applicants/candidates. Further, the use of QlikSense may enhance the University's commitment to equality and diversity issues by assisting in the development of diversity initiatives in areas such as recruitment. University divisions looking to hire new members of staff could leverage QlikSense to create reports on the composition of the current workforce to assess which groups are underrepresented. Finally, we hope that the consideration shown to any potential impacts on any of the 9 protected characteristics as part of this project helps to demonstrate Information Services and the University's commitment to equality and diversity.

- 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 a tool for data analytics. All staff and students have access to free IT facilities 24 hours a day, which they could use to access QlikSense.

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

University specific documentation and training for QlikSense is planned, and 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.

- 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 QlikSense. 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 QlikSense will respond to directly. We plan to do another accessibility test if the system is changed significantly.

- 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.
Based on the reasons stated above.

~~**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)): **Anne Major (Service Manager (Reporting and Analytics), Applications Division, Information Services)**

Accepted by (name): **Susan Cooke – EDS Team Service Manager**
[This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]

Date: **14th Aug 2019**

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