



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):

Online Invigilation allows users to participate in an online exam in a location which is convenient for them. It allows the institution to replicate exam hall conditions whilst monitoring the student digitally and can include, among other things:

- Student ID Checks;
- Room Scans;
- Audio/video recording;
- Screen Recording;
- Locked down browsers;
- Human or AI based invigilators.

Online Invigilation only facilitates the invigilation aspect of an exam and does not include the online assessment software. This will be used for summative assessments only.

This will be delivered via Examity, which operates as a Chrome addon that is available for the Chrome and Edge browsers. The addon is automatically removed at the end of the session.

At this time Schools have to apply (via a strict governance process) to use this system and they will be made aware of the issues such as accessibility that they need to consider if they decide to use it. We expect only a very small proportion of all exams to be conducted in this way. AI invigilation will not be used at this time.

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: **Karen Howie**

Job title: **Head of Digital Learning Applications and Media**

School/service/unit: **Learning Teaching and Web 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 EqlA? **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 Online Invigilation service has the potential to affect all students, and therefore may impact on all nine protected characteristics. However, the protected characteristic of disability may have the greatest impact, as this relates to working in conjunction with an online system and it will need to be accessible as far as possible in line with the Web Content Accessibility Guidelines 2.1 AA (WCAG) 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 student be unable to use the system and we were unable to rectify. Reasonable adjustments can be added to any user's session after they have created a profile, and human invigilators will be able to cite these adjustments prior to the activity starting, subsequently referring to these adjustments when the user is participating in the invigilated activity. This allows users with reasonable adjustments to participate in the activity using their local assistive technology.

Information about Online Invigilation will be hosted on the University website (EdWeb), which is governed by a Website Accessibility Policy and is designed to be accessible as far as possible in line with the WCAG 2.1 AA standard.

It should be noted that in every and all circumstances, staff may need to seek alternative assessment formats, and is why strict usage governance has been created. School & College committees will review all invigilation requests and ensure its usage is limited to defined use cases which have been agreed across all Colleges. Such agreed alternatives would not impact the competence standards or pedagogical integrity of the subjects being assessed and examined. Schools will have information on users who have registered support and reasonable adjustments through the Student Disability Service (SDS), and will have processes for ensuring disabled users can participate in summative assessments. These processes will not change.

At this time Schools have to apply to use online invigilation and they will be made aware of the issues such as accessibility that they need to consider if they decide to use it. We expect only a very small proportion of all exams to be conducted in this way. At present this is the

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.

only software out there that meets our needs and the requirement for, in particular, vocational courses such as medicine and vet medicine to have invigilated online exams.

Furthermore, there is also the potential for the system to impact on race, first through the main language being English. This is mitigated by the fact that the main teaching language of the University is English. Furthermore, some countries, including China and Russia, may block access to some websites. If it became apparent that the system was being blocked, then we would ensure users from these countries were not placed at a disadvantage by allowing them to complete the assessment in another manner.

The availability of the service 24 hours a day, 7 days a week, may positively impact several of the protected characteristics. In particular, pregnancy and maternity, disability, those with caring responsibilities (which tend to be women disproportionately) and those who observe and adhere to specific times of religious observance. However, this will depend on the timeframe set for the exam.

Any content added to the service by users should not discriminate against any of the protected characteristics. Any content found to discriminate would result in disciplinary action. Within Online Invigilation, a user would be identifiable, as the use of photographic ID is required as part of the setup process to identify participants by remote invigilators. Therefore, caution will be needed to ensure people are not making judgments based on an individual's name, particularly with regard to gender or race. There should be no discrimination for users who do not wish a photograph to be used, including for religious reasons. Examity's invigilators do the invigilation and they would highlight potential issues to us and then the course organiser or marker would check. So this introduces an extra layer of checking, and therefore hopefully a reduced risk of discrimination.

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:

- On any available information about the needs of relevant equality groups:
Disabled users will expect that the service complies with the recognised accessibility standards (WCAG 2.1 AA), and subsequently be compatible with various forms of assistive technology. Therefore, the team have tested the application for accessibility. High-usage course convenors were contacted to gather feedback on the service. Additional specific adjustments can be considered for individual cases, should aspects of the service remain inaccessible.

Examity will also allow for specific adjustments based on user's needs, these include, but are not limited to:

- Extended time (the vast majority);
- Use of chat for communication with the invigilator/technical support specialist;
- Use of screen readers;
- Someone assisting with the test (reading questions);
- Allowed to read questions out loud;
- Additional breaks;
- Medications during test;
- Stretch breaks on camera;
- Off camera breaks;
- Diabetic testing, food and beverage allowed.

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

At this stage, we have sufficient evidence to proceed. Further information on impacts to any of the protected characteristics will continue to be monitored via any feedback we receive, positive and negative, when the service begins operation. If feedback is received showing a negative impact on a protected characteristic, this will be addressed by providing additional information on the service to mitigate the issue.

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

We do not expect that the service will lead to any form of prohibited conduct for the reasons detailed above and below. However, should a disabled user prove unable to access the service, and we were also unable to rectify this issue, then reasonable adjustments would be put in place. This could include utilising access of the service through provision of assistive technology or allowing them to submit assessments without online invigilation or through a different process, which would be developed by the course convenor in consultation with the SDS. As part of the governance system in place for requesting access to the service course convenors will be asked to consider alternative assessments methods as well as reviewing the needs of users. A review of these measures, alongside any feedback received, positive or negative, on all nine protected characteristics will be continually undertaken.

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

Online Invigilation contributes to advancing equality of opportunity by allowing users to undertake assessed work at an individually suitable time, 24 hours a day, 7 days a week, and location. This could have benefit for a wide range of users, such as those with caring / parental responsibilities, those who observe times of specific religious observance, and some disabled users. However, the flexibility of time depends on the time requirements of the exam.

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

As mentioned above the flexibility of when and where assessments can be accessed should widen the scope of participation for many users from across a range of protected characteristics. It is hoped that by considering impacts (positive and negative) on all the protected characteristics in offering this service, and via this EqIA, we are showing that Information Services and the University are committed to equality and diversity. We have considered ways to mitigate and provide support and information to users in these groups. As mentioned above, the internal governance process will help to ensure that course convenors have explored alternative means to ensure that the assessment is accessible to all students within the specified cohort. Once an assessment is approved for remote invigilation all participants will be made aware and able to access guidance documentation regarding the process and be invited to provide feedback. It is hoped that this will create an avenue for dialogue between participants, organisers, course convenors and the governance board that will improve the provision of the service.

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

Online invigilation requires users to have a number of technical requirements, including access to a desktop or laptop, web-camera, working audio, updated version of a supported browser and the internet with a minimum upload and download speed of 2 mbps. Users may also not have access to an exam conditions-like environment to participate in the activity. These barriers are published on the Online Invigilation webpages, which staff are strongly advised to review prior to requesting approval to use online invigilation for an activity. Colleges and Schools will need to consider these two variables accordingly.

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

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

All information is available in alternative formats for disabled users, free of charge, on request and details on how to obtain this are provided in our accessibility statement which is part of our legal requirements under The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

Online invigilation webpages are hosted on the University webpages, governed by a Web Accessibility Policy which is based on the WCAG 2.1 AA standards.

Once an assessment is approved for remote invigilation by both School and College, all participants will be made aware either via email or notification from the requisite course instructor, and be able to access guidance documentation regarding the process and be invited to provide feedback. At this stage, individual participants will also be able to raise concerns and request for specific accommodations, including alternative assessment methods. This could include, but is not limited to, the course convenor, SDS or personal tutor of the user.

- 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 and the International Officer were asked to comment on the EqIA. The service has been tested as part of an accessibility review and will be tested again following any major updates to the system as required. We will continue to monitor all feedback for any comments, positive or negative related to any of the nine protected characteristics.

- 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 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.

~~**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).

This is specified throughout the EqIA. Moreover, the EqIA will be reviewed on an ongoing basis as the service develops. Staff will be reminded of the need to make reasonable adjustments, and to provide documentation in alternative formats, free of charge, upon request. As part of the approval process for utilising this service course convenors will be asked to consider alternative assessment types as well as including specific accommodations

for participants including amendments and alternatives on a need's basis. We will monitor all feedback, positive and negative, related to provision of the service that may pertain to any of the nine protected characteristics.

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

A review shall take place if there are any significant changes to the service, alongside other periodical reviews. Moreover, a review will take place should feedback be received, positive or negative, related to any of the nine protected characteristics. On each of these occasions, the EqIA will be updated.

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)): **James Slack, Service Manager (Learning Technology), Digital Learning Applications and Media, Learning Teaching and Web Directorate, Information Services Group**

Accepted by (name): **Karen Howie, Head of Digital Learning Applications and Media, Learning Teaching and Web Directorate, Information Services Group**

Date: **30th August 2021**

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