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): **Vocareum is a hosted cloud-based lab platform providing users access to an integrated development enviornment (IDE) which can be used for teaching and assessment coding activities.**

B. Reason for Equality Impact Asessment (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):~~

July 2019
The institution currently delivers online credited content via different platforms however this is the first time we will be creating the capability for delivering micro-accreditation (called a 'MicroMasters' by edx, which is at the same academic level but smaller than an Online Master's Degree.
Vocareum will be utilised to provide access to coding exercises and assessment for learners within the Micro-Masters and full masters students (who will be participating in the Micro-Masters). Vocareum has been chosen due to their ability to manage the scale of numbers expected, having an existing relationship and integration with the vendors and other partners.

C. Person responsible for the policy area or practice:

Name: **Stuart Nicol**

Job title: **Head of Educational Design and Engagement**

School/service/unit: Information Services – Learning, Teaching and Web - Educational Design and Engagement, Information Services

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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
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership[1]

Overview
The Distance learning At Scale programme (DLAS) is an overarching business programme for building the University of Edinburgh's capability for delivering master's level online learning at scale and trialling these capabilities through pilot academic programmes. DLAS will be delivering content primarily via the edx.org platform with content accessible globally and available to users both non-affiliated with the institution and UoE registered students.

Vocareum will be utilised to provide access to coding exercises and assessment for learners within the Micro-Masters and full masters students (who will be participating in the Micro-Masters) Vocareum could be integrated into numerous courses\modules offered within a MicroMasters to all potential users including learners and students thus has the potential impact on a broad set of users and therefore to affect all protected characteristics however we feel that the protected characteristics of disability and race are the most likely to be impacted. Users will access Vocareum via the course content within edx.org.

Disability:
The protected characteristic of disability may be affected as this is 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 standard including compatibility with assistive technology such as voice recognition software, screen readers or screen magnification software. Reasonable adjustments will be put in place if for any reason a disabled edX learner, staff or student was unable to use the system.

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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.

Vocareum have conducted a VPAT (voluntary Product Accessibility Testing) which tested a limited subset of pages as a student (testing wasn't conducted on Instructor content):

- **Student Login (https://labs.vocareum.com/home/login.php)**
- **Student Course Assignment Listing**
- **Student IDE**
- **Student Gradebook**
- **Help Website**

3rd party open source and commercial tools are available via Vocareum (including Jupyter, RStudio MySQL Workbench, and Eclipse) but are optional thus may not be enabled for users. These tools were not evaluated in the VPAT and are out of the remit for Vocareum (as they act as host for the tools and are unable to modify). The VPAT conducted by Vocareum indicates it meets the WCAG 2.0 standard Level AA. In addition, the Information Services Disability Information Officer has conducted testing and created an accessibility report which we have feed this back to Vocareum.

Users will access Vocareum via a link in a course via edX. We are legally required to provide reasonable adjustments to both learners and students and part of this is allowing them access to disability support via The Student Disability Service) and We will advertise this within each course (which there could be multiple within a MicroMasters) via the welcome kit (which can be accessed via the course content) and the support tab (which will be accessible on every course page) . See below for example text submitted by Student Disability service

"If you require support for your learning due to a health condition, learning difference or disability please contact the Student Disability Service directly to discuss your needs. You can contact them by email: Disability.Service@ed.ac.uk or phone: 0131 650 6828 and can also find more information about the Service from their website: **www.ed.ac.uk/student-disability-service**

We will try and ensure the content delivered via the Vocareum UI is accessible however are restricted by the platform.

We will flag any issues with Vocareum who deliver content for numerous institutions globally and have a vested interested in ensuring a non-discriminatory platform (to maintain and increase access levels in a competitive market place). Vocareum is hosted thus we are unable to make platform changes to meet the institutions requirements or resolve any platform issues however we can report any accessibility issues identified directly to the named contacts via email or the general support email.   Race:
Race is a relevant characteristic in that the majority of the site is in English but English is the main teaching language of the University. The teaching language is advertised on the general information page prior to the user enrolling via edx.org. There may also be an issue in some countries (China, Russia etc) where there are restrictions on Internet Access and so the content may be blocked.

Other Protected Characteristics:

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. Vocareum is a coding tool and does not have a discussion tool (although the wider EdX courses do) so the changes of this happening are reduced.

There is the potential for Vocareum to have a positive impact on various protected characteristics. The access to Vocareum will allow course users to access all aspects of the course and have the tools to complete their assessments as students who were on campus would provide a high degree of flexibility for example for those with caring/parental responsibilities, those who wish to observe specific times of religious observance and for some disabled users (e.g. those with mobility issues or those affected at specific times of day be medications etc) to complete the course at a location and time of their choice.

The University vision is a continuing commitment to equality and diversity for both students and staff. The University has a single equality strategy to ensure that equality and diversity 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:
  There will be the expectation from users with accessibility issues that the system complies with the recognised accessibility standards (Web Content Accessibility Guidelines 2.1 AA standard) including compatibility with various forms of assistive technology. Vocareum is the hosting platform providing access to 3rd party tools so whilst Vocareum may meet accessibility the various 3rd party tools available via the platform may not meet accessibility. We have asked Vocareum for information about the accessibility of their produce and the Information Services Disability Information Officer has conducted and accessibility audit of the platform in line with the Web Content Accessibility Guidelines 2,1 AA standard. We have also run the EqIA past the Student Disability Service and the International Office for comment
  We will continue to 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:
  Presently we feel that we have conducted a wide review and don't see any gaps however the equality groups and impact will be reviewed on an annual basis or sooner if a gap is identified. Vocareum doesn't advertise accessibility guidance or policy on its webpages. We have requested information from the Chief Executive Officer (CEO) who supplied the Voluntary Product Accessibility Template (VPAT) and have conducted an internal accessibility audit of the platform and fed back our findings to the supplier where there are issues out with our control.

- 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 Vocareum will result in any form of prohibited conduct for the reasons given above and below. Where a user is unable to access Vocareum for a reason related to a disability, then reasonable adjustments will be put in place these may include the option to use an alternative coding programme of their choice and then having it uploaded for them or support from the Student Disability Service etc.

- If the policy/practice contributes to advancing equality of opportunity[2]
  Vocareum will be used only as part of the DLAS project which looks to enhance equality of opportunity by offering 24 hr access to course content that would not otherwise be available remotely or in other time zones. The service is actively used to support distance learners and provide them with the same quality of taught content as provided on campus.
  DLAS will provide the opportunity for anyone around the world to experience online education delivered by a top ranking university and the opportunity to gain accreditation either via MicroMasters or Masters qualification at the University of Edinburgh. This may advance equality of opportunity by allowing users to participate in all aspects of the course remotely which increases flexibility and may have a positive impact on those with caring responsibilities, parental responsibilities, some disabled users(e.g. those who due to medication prefer to study at specific teams, those with mobility difficulties etch) and those who wish to observe specific times of religious observance.

- If there is an opportunity in applying this policy/practice to foster good relations:
  Users will access Vocareum via the course content within edx.org. For learners and students there will be tools available (edx native and external) that will be used to foster a digital community (e.g. discussion boards, social media, online video sessions, peer reviewing assessments). These will be accessible and monitored by academics and teaching assistants who can engage with users enrolled on the course. Users will be able to raise any Equality and Diversity issues via these methods or by emailing teaching assistants directly. It is hoped that by considering impacts on all the protected characteristics via this EqIA we are helping to show the commitment Information Services Group and the University as a whole has to Equality and Diversity.

- If the policy/practice create any barriers for any other groups?
  Presently we don't envision any barriers expect for the ones previously highlighted (which we are trying to mitigate via accessibility awareness and advertising the course language as English). Due to the cost of accessing content and gaining recognition of learning via a certificate (either from edx or the institution) there could be an impact on users who are economically unable to afford the cost. Also due to the content being fully online we would be impacting on anyone unable to access a mobile, desktop or laptop connected to the internet. However, within the UK many public libraries provide free computing and internet access and

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

this is true of many other European countries, although not worldwide. Access to Vocareum is part of the cost of the masters and not an additional cost.

- 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 provide 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.](#)

- 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, the Student Disability Service and the International Officer were asked to comment on the EqIA. The Information Services Disability Information Officer has also conducted an accessibility review of Vocareum and will test 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.
Based on the information detailed 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).
   - **All courses will include a link to the Vocareum Accessibility statement that includes a contact email address :micromastersaccessibility@ed.ac.uk. The mailbox will be monitored by EDE and DLAM staff whom will review incoming mail and take appropriate action.**

- Any accessibility issues raised will be fed back to Vocareum where we are unable to make the change.
- **Staff will be reminded of the need to make reasonable adjustments and provide information in alternative formats upon request.**
We also promote good practise amongst academic colleagues and content creators and liaise with the vendor.

2. When will the policy/practice next be reviewed?
The policy will be reviewed if we receive any positive or negative feedback from users, key stakeholders in the project or the system that is related to any of the nine protected characteristics or if there are any substantial changes to the process/practice.

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)):**Myles Blaney, Senior Service Manager, Digital Learning Applications & Media - Information Services – Learning, Teaching and Web**

Accepted by (name): **Stuart Nicol, Head of Educational Design & Engagement, Educational Design and Engagement, Learning Teaching and Web, Information Services**

Date: **14/08/19**

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