



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):

Blackboard Learn

Virtual Learning Environment for campus based and distance learning courses

July 2017

Update following the Summer Upgrade to Blackboard Learn Q4 2016 release. This release is part of a continual programme of updates supporting bug fixes and security improvements. This release also includes an updated look and feel to make the system more consistent and easier to use on mobile/tablet devices.

July 2018

Update to EQIA as part of the 2018 Summer Upgrade to Blackboard Learn Q4 2017 release.

August 2024

Update to EqIA since full upgrade to Learn Ultra (summer 2023)

B. Reason for Equality Impact Assessment (delete as applicable):

- ~~• Proposed new policy/practice~~
- **Proposed change to an existing policy/practice**
- ~~• Undertaking a review of an existing policy/practice~~
- ~~• Other (please state):~~

July 2017

Learn service upgrade with noticeable change to look and feel and way of representing content within courses hosted in Learn

July 2018

Service upgrade with minor interface changes and functionality

August 2024

Learn Ultra upgrade has completely changed the user interface to the Virtual Learning Environment, it is very different. We have supported staff and students in the move by:

- **running training for using the new platform (primarily for staff). This is available online and in person. Consideration has been made and continues to**

be made to potential issues regarding Equality and Diversity when providing this training such as online accessibility and in-person accessibility as well as providing the training on a variety of days and times to provide flexibility for those with caring/parental responsibilities, those who observe times of religious observance and some disabled users.

- providing a new Help & Support site, which has support in a variety of media – text and video format. It is easier to search and find what you need than our old site.

Since 2018, we have also been doing a number of things to support improvements to accessibility in our VLE by:

- Providing online training for staff on how to make teaching content accessible
- Using our team of student interns to complete an audit of content in Learn for each School and the School is provided with a report to guide and advise on how content could be made more accessible.
- Adding Anthology Ally to the service which highlights accessibility issues with content as it is created/uploaded and allows students to download alternative formats of the content. It also provides us with accessibility reporting opportunities.

C. Person responsible for the policy area or practice:

Name: **(previously Ross Ward) now Paul Smyth**

Job title: **Learning Technology Advisor**

School/service/unit: **Information Services – Learning, Teaching & Web**

July 2017 - No Change

July 2018 – No Change

August 2024 –

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 – core service to support teaching and learning**
- 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**

July 2017 - No Change

July 2018 – No Change

August 2024 – No change

E. Equality Groups

To which equality groups is the policy/practice relevant and why? (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 partnership¹

The LEARN service has the potential to impact all students and therefore the potential to affect all potential protected characteristics but we feel that the protected characteristics of disability and race are the most likely to be impacted. The protected characteristic of disability may be affected as this is an online system and it will need to be accessible and compatible with assistive technology such as voice recognition software, screen readers or screen magnification software and reasonable adjustments will need to be in place if for any reason a disabled staff or student was unable to use the system. Blackboard states it “is committed to ensuring that the platform is usable and accessible. The code and user interface design techniques are continually audited to ensure that the application is usable by everyone, to the greatest extent possible, regardless of age, ability, or situation and is delivered in compliance with the Web Content Accessibility Guidelines version 2 (<http://www.w3.org/TR/WCAG20/>).”

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.

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 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 help guide staff on their requirements regarding accessibility when uploading course content as well as a set of published guidelines <http://www.ed.ac.uk/information-services/help-consultancy/accessibility/creating-materials/accessiblevlecontent>

In addition to the accessibility policy we also raise awareness for accessible content in our Learn Support webpages and cover these issues during consultation meetings to staff wishing to use Learn to support their courses.

Race may be impacted on as Learn is available in English but as Learn is only for students and staff at the University and English is the main teaching language we feel in practice this should not lead to any disadvantage

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.

In fact there may be a positive effect for some students whose first language is not English as it will enable them to review materials/questions asked etc at their own pace. In addition, the potential to view the materials as often as the student likes may be beneficial to both disabled students and students whose first language is not English.

Update 2017 – the new look and feel of the Learn site underwent accessibility testing based around the Web Content Accessibility Guidelines Version 2 AA standard and recommendations were made but on the whole it was felt the change had improved accessibility for disabled users and Learn remained compatible with assistive technology.

Update July 2018 – No change to the core theme, and only minor changes required to improve some usability aspects. During usability testing we identified a concern that editing buttons do not stand-out with as much contrast as we would like. A development tweak is in progress to add more definition.

Update August 2024 – the VLE has a brand new user interface. Although there are still some accessibility issues, on the whole, the accessibility and usability of the new interface is better. We are working with Anthology to fix the remaining accessibility issues. The remaining issues may affect users with visual impairments or those who use a keyboard for navigation.

Since 2018, we have also been doing a number of things to support improvements to accessibility in this area including:

- **Providing online training for staff on how to make teaching content accessible**
- **Using our team of student interns to complete an audit of content in Learn for each School and the School is provided with a report to guide and advise on how content could be made more accessible.**
- **We've added Anthology Ally to the service which highlights accessibility issues with content as it is created/uploaded and allows students to download alternative formats of the content. It also provides us with accessibility reporting opportunities.**

Add notes against the following statements where applicable/relevant:

- **On any available information about the needs of relevant equality groups:**

There will be the expectation from some disabled users that the system complies with the recognised accessibility standards (Web Content Accessibility Guidelines version 2) and be compatible with various forms of assistive technology. The system is only available in English but as English is the main teaching language of the University and only students and staff will have access to the system we do not envisage that this will cause any disadvantage. The Disability Information Officer has conducted a full accessibility audit of Learn the results of which we have implemented as far as possible.

We have also consulted Student Disability Services who were happy with the EqIA and did not identify any other issues.

Update August 2024 – we have done some testing but not a full audit of Learn Ultra and as of yet (this is scheduled for September 2024). The Student Disability and Learning Support Service have been consulted about this EqIA. The accessibility statement has been updated and further testing is planned from Summer 2024.

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

At this stage we feel we have sufficient information to proceed but will monitor all feedback and suggestions for any positive or negative issues relating to any of the 9 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 Learn will result in any form of prohibited conduct. We will ensure the system is as accessible as possible but will also ensure reasonable adjustments are in place so that no disabled student or staff member experiences less favourable treatment if they are unable to use the system. As discussed above polices are in place across the University to govern any content that is added.

Update May 2024 – We have now published a Take Down Policy and Terms & Conditions of use for our VLE.

[Policies for Learn](#)

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

The Learn VLE platform looks to enhance equality of opportunity by offering 24 hour access to course information, assessment activities, and other educational services that would not otherwise be available remotely or in other timezones. The service is actively used to support students on-campus and those studying at distance.

Update 2018 – we have received no positive or negative feedback related to any 9 of the protected characteristics.

Update 2024 -to date we have received no positive or negative feedback related to any 9 of the protected characteristics with regard to Learn Ultra so far. We believe the new interface is more accessible and easier to use than the previous version of Learn and this should improve the equality of opportunity for all.

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

The Learn service enables greater course based communication between staff and students, and within the student groups within the course. There is the capability for questions and discussions to be shared to all and responded to. The nature of this communication means that the information shared is persistent and accessible at any time asynchronously. Learn also acts as a collaborative tool for group/peer work, and can also be a central location for disseminating feedback and pastoral support to students from the tutors.

Update 2024 - It is hoped that by considering positive and negative impacts on all the protected characteristics, in particular by reviewing the introduction of Learn Ultra, and subsequently the update of this EqIA, we are showing that the University is committed to equality, diversity and inclusion. We have considered ways to mitigate and provide support and information to users in these groups.

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

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

We don't believe that Learn will create any barriers for any groups as we have ensured the system is as accessible as possible for disabled users. The University has free 24 hour access to PC facilities for all staff and students so there should be no disadvantage to those who are on lower incomes and don't have access to their own personal IT facilities.

Update 2018 – we have no evidence or indication that Learn has created any barriers for any other groups

Update 2024 – we have no evidence or indication that Learn Ultra has created any barriers for other groups. All staff and students continue to have access to free, 24 / 7 IT facilities at the University, principally at the George Square Main Library. IT facilities are also provided at other campuses across Edinburgh. Public libraries in the UK also facilitate free access to the internet. Finally, other countries have similar options available.

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

Information about accessibility will be made available via the “Help” section directly within Learn, as well as information on the supporting webpages that are hosted by the University of Edinburgh. Information about Learn is provided to students in a number of different formats – from verbally by their course tutors to information on the Information Services Website which has been checked for accessibility. Information about Learn and help will be available in alternative formats upon request.

July 2017 – The Learn Service Team have received no requests for information in alternative formats.

July 2018 – The Learn Service Team have received no requests for information about Learn support in alternative formats.(there may of course have been requests for alternative formats to the Schools directly)

August 2024 – The Learn Service Team have received no requests for information about Learn support in alternative formats(there may of course have been requests for alternative formats to the Schools directly).

It is possible now to use Ally directly in Learn to produce alternative formats automatically – although if the original file is not very accessible, Ally may not produce a very accessible alternative. We also provide [SensusAccess](#) as another means to download alternative formats.

If Ally or SensusAccess don't help or if you need more help, content should include an alternative format content or students can contact the course organiser or administrator to request. You can also reach out to the IS Helpline (is.helpline@ed.ac.uk / 0131 651 5151) with a request.

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

The Disability Information Officer, and the Student Disability Service were asked to comment on the EqIA.

All feedback and comments will be monitored for any positive or negative impacts on any of the 9 protected characteristics and acted on accordingly.

July 2017 – The Learn Service Team received no negative or positive feedback relating to any of the 9 protected characteristics.

July 2018 – The Learn Service Team received no negative or positive feedback relating to any of the 9 protected characteristics other than feedback from the IS Disability Information Officer.

Some elements of the Learn interface and suggestions for improvements were highlighted by ISG Disability Information Officer and ISG Information Security Consultant in relation to the following areas:

- 1. Colour contrast for course navigation and buttons.**
 - a. Some elements have been reviewed and changed where technically possible, other elements will be reported to vendor as improvement requests**
- 2. Link to University Accessibility Guidance in system footer**
 - a. Not currently possible within system, but being investigated**
- 3. Some issues raised with assistive software “TextHelp Read and Write Gold”**
 - a. Not currently resolvable and will be reported to vendor as improvement requests**
- 4. Use of italics for inline-help and system suggestion**
 - a. Not currently possible to change and will be reported to vendor as improvement requests**
- 5. Issues around lack of highlight and process for keyboard navigation**
 - a. System has a number of keyboard accessibility shortcuts “quick links” for improved keyboard navigation.**
 - b. “Tab” styling has been improved with the Blackboard Q4 2017 release to make active states more visible**

An internal system review identified an issue has been identified with the “Quick Links” accessibility tool when Learn is accessed via MyEd. There have been no support calls logged with this, but a workaround solution is available. This issue has been logged with the vendor.

May 2024 – EqIA reviewed by staff at our Disability and Learning Support Service . Learn has a brand new interface with accessibility improvements – there is less italics text used in the interface, keyboard navigation works much better, colour contrast is more consistent and there is now a link at the bottom of the left hand menu which links to information about accessibility (but not to our own Accessibility Statement unfortunately). We have had useful conversations with Anthology about accessibility and are seeing improvements.

- 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:**

We will continue to promote accessibility as being key to Learn and will test all upgrades for accessibility which we feel will continue to demonstrate the seriousness by which Edinburgh University takes the issues of Equality and Diversity and in this case in particular the needs of disabled users and the desire to make the applications they use as accessible as possible and to mainstream as many adjustments as possible.

July 2017 – Minor changes to typos and formatting only

May 2024 – as already mentioned:

- **We have now implemented a formalised operational procedure via the Take Down policy and VLE Terms and Conditions.**
- **We now complete accessibility audits using an intern team who are specifically trained on what to look out for. Schools are provided with a report and tasked with making the required changes.**
- **We now have Anthology Ally which supports accessibility by highlighting issues on the creation or upload of content and allowing students to download alternative versions.**
- **The use of Ally has highlighted there are issues with a significant quantity of the content created using LaTeX (typically used in the maths and science areas) and we are currently investigating fixes for that.**

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. (Delete the options that do not apply):

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

Option 1 for the reasons stated above

July 2017 – No Change

July 2018 – No Change

August 2024 – no change

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).

The need for reasonable adjustments to be made if necessary and the requirement for content uploaded to be accessible will be highlighted again to those using Learn, through information on our webpages, course design sessions and consultancy

We will continue to monitor all feedback for any positive or negative effects on any of the 9 protected characteristics.

July 2018 – A University initiative titled “Learn Foundations – TEL057” is in the process of being formed to increase awareness to all those responsible for creating courses, teaching activities, and resources in a universally accessible manner, and promote the issues raised in this EQIA, and promote best practice. A separate EqIA will be conducted for the VLE standard project.

The TEL057 project project will have its own EQIA

August 2024 - Continue to work with Anthology to improve accessibility of platform where required. Continue to work on guidance and advice on how to make science and engineering subjects, in particular maths, more accessible. The VLE standards project mentioned above has been helpful in making each course

site more consistent so that students can find what they need in course sites more easily. It's also highlighted accessibility issues in content and Schools have had reports to summarise issues. We will continue to provide feedback to Schools and the supplier (both positive and negative) on each of the nine protected characteristics. We have completed work to [evaluate the new interface from a usability perspective](#). We continue with User Experience testing/research on the platform and the workflows we support through use of the platform.

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

It will next be reviewed when there is any significant change or upgrade to Learn or if we receive any positive or negative feedback related to any of the 9 protected characteristics.

July 2017 - EqlA has been updated as part of the summer upgrade where the change was significant. We continue to monitor positive and negative feedback related to the 9 protected characteristics and update the EqlA when there is any such feedback or when there is a major change. The Learn service also keeps up to date with developments from the vendor that may have a positive impact on the 9 protected characteristics.

July 2018 – EQIA has been updated as part of the summer upgrade where changes although minor required the EQIA to be reviewed and adjusted. We continue to monitor positive and negative feedback related to the 9 protected characteristics and update the EqlA when there is any such feedback or when there is a major change. The Learn service also keeps up to date with developments from the vendor that may have a positive impact on the 9 protected characteristics.

August 2024 – further accessibility testing will be completed over the next few months and the accessibility statement and EqlA will be updated once that is done.

H. Publication of EqlA

Can this EqlA be published in full, now? **Yes**

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

July 2017 – No Change

July 2018 – No Change

August 2024 – no change

I. Sign-off

EqlA undertaken by (name(s) and job title(s)): **Ross Ward – Learning Technology Advisor**

Accepted by (name): **Jo Spiller, Acting Head of Educational Design & Engagement**

Date: **31st October 2016**

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EqIA updated by (name(s) and job title(s)): **Ross Ward – Learning Technology Advisor**

Accepted by (name): **Jo Spiller, Acting Head of Educational Design & Engagement**

Date: **4th July 2017**

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EqIA updated by (name(s) and job title(s)): **Stephannie Hay - Service Manager
Digital Learning Applications & Media, Information Services**

Accepted by (name): **Stuart Nicol, Head of Educational Design & Engagement**

Date: **27th August 2018**

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EqIA updated and accepted by (name(s) and job title(s)): **Karen Howie, Head of Digital
Learning Applications and Media**

Date: 16 August 2024

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