



Equality Impact Assessment Template

Before carrying out EqlA, you should familiarise yourself with the University's EqlA Policy Statement and Guidance and Checklist Notes, and undertake our online training on Equality and Diversity and EqlA. These, along with further information and resources, are available at www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment

EqlA 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): **Switching automated captions on by default in our Lecture Recording Service**

We create around 40 thousand hours of lecture recordings at the University every year in Media Hopper Replay (Lecture Recording service). This service improves the general accessibility of lectures when used for the following reasons:

- Students can rewatch lectures as often as they like to engage with the lecture topic and ensure they understand what's being covered.
- If a student misses a lecture due to illness or other good reason, the recording is there so they can watch at a later date and don't miss it.

At the moment, automated transcripts are created by default for all lecture recordings in the service however these are not turned into captions automatically and the process of creating captions from the transcript relies on an intervention by a member of staff. There is no data available currently from the platform to say how often this is done but based on anecdotal evidence, we believe the engagement with automated captions in the service is low.

Although the automated captions would not be perfect, we believe that turning them on by default would improve the experience of watching lecture recordings especially for those with hearing impairments or international students whose first language isn't English.

B. Reason for Equality Impact Assessment (Mark **yes against the applicable reason):**

- Proposed new policy/practice
- Proposed change to an existing policy/practice - **Yes**
- 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 Services, Information Services

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

Add notes against the following applicable statements:

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

Our lecture recording service has the potential to impact all students and therefore the potential to affect all 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 recordings without captions may be inaccessible to someone with a hearing impairment.

Having a lecture recording service does make lectures more accessible (when the service is in use) by making them available to watch again at a student's preferred time and pace, or can help them catch up if they've missed the original lecture for a good reason. However, lecture recordings will be inaccessible to a student with a hearing impairment without captions. Therefore, this proposed change is likely to improve the student experience, especially for students with hearing impairment.

Race is a relevant characteristic in that the majority of media on this service will be in English (English is the main teaching language of the University). The proposed change to automatically enabling captions would improve student experience, including international students whose first language isn't English.

Captions on lecture recordings also allows more flexibility – for example, students can watch lectures in public places without disturbing others because they can read the captions rather than listen to the audio so this might make lectures more accessible for people with caring responsibilities (flexible on time/place).

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

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.

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 don't believe the use of automated captions will result in less favourable treatment for particular equality groups, however automated captions can be prone to error and some students may prefer not to use them depending on the frequency of the errors. A caption track has to be explicitly made visible by students and they can easily hide it if the captions are poor quality. For people with severe hearing impairments, even fairly poor quality captions may still improve their experience of watching recorded lectures (especially true if the recording includes useful slides).

Students with adjustments can also request that our human-corrected captioning service fix the automated captions. This can be requested via our [caption-correction request form](#).

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

We believe this practice should contribute to advancing equality. The provision of recordings/media already makes the media content more accessible – it can be accessed 24/7 from anywhere and replayed whenever required.

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

In general, we feel that providing automated captions will improve relations. It is hoped that by considering positive and negative impacts on all the protected characteristics, 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.

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

There is a risk that the automated captions created are very poor quality and unusable. In this situation, they may be a barrier for the student watching the recording. The student can then hide the caption track or request human-corrected captions via the [caption-correction request form](#). Requests from students with captioning adjustments will be prioritised.

There is no charge for users to turn on the captions.

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

Once this new practice is approved, we'll make people aware of it by reaching out to Lecture Recording support staff in Schools, School student advisers and via the Disability and Learning Support Service. We will also communicate out about it via various newsletters and user groups to make sure people understand what's been changed. We'll update the services accessibility statement to include information about this change and also update the service webpages with information. Information about the change will be provided in alternative formats free of charge upon request.

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

All online content about the change will be manually tested against WCAG 2.2 and an accessibility statement where required.

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

We have a Captioning Service Project which has been working on improved automated captions and a human corrected captioning service for priority media and this project is governed by a Project Board. A request to switch on automated captions by default is fully supported by this board. The board includes representatives from the Disability and Learning Support Service, accessibility experts and staff and students with hearing impairments.

Once captions are turned on by default, we'll make a survey available for staff and students so they can provide us with feedback on how it's working.

- 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 monitor impact going forward and include an update next time we review this EqIA.

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. For the reasons detailed above

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 monitor all feedback for any positive or negative effects on any of the 9 protected characteristics. Continue to work with our Media Hopper Replay platform providers to improve the quality of the automated captions provided. We are also planning some work we hope will make improvements to the quality of automated captions from these services:

- Using the summer in 2024 to spot check audio quality of recorded lectures and work on guidance for staff on how to improve audio quality but also deal with any technical issues we find that may be impacting the quality.
- We are planning a project to look at the impact AI may have on automated caption quality going forward, working with the Natural Language Process Group in Informatics.
- Ensure staff are made aware of the need to make reasonable adjustments and provide information in alternative formats upon request.
- Monitor all feedback positive and negative for anything related to the 9 protected characteristics and act accordingly.

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

In Summer 2025, this EqIA will be reviewed.

H. Publication of EqlA
Can this EqlA be published in full, now? Yes
I. Sign-off
EqlA undertaken by (name(s) and job title(s)): Karen Howie (Head of Digital Learning Applications and Media)
Accepted by (name): Karen Howie (Head of Digital Learning Applications and Media)
Date: August 2024

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