

THE UNIVERSITY of EDINBURGH

# **Equality Impact Assessment**

# University of Edinburgh Short Courses Platform

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

### University of Edinburgh new Short Courses Platform

The University of Edinburgh is invested in supporting learning that fits the needs and demands of our modern society and 2024 will include the launch a new Short Courses Platform to support this objective.

The roll-out of the Short Courses Platform will help to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all. It will do this by allowing growth and expansion of our short course offering, making courses easier to find, register and study on, as well as streamlining the process of administering them. This helps us meet our duties under The Equality Act 2010 and the (Specific Duties) (Scotland) Regulations 2012 and contributes to advancing equality of opportunity for all.

This overhaul in learner experience is underpinned by improved technology which provides course teams with a consistent, streamlined process through which to administer short courses, as well as detailed metrics about their learners which can be used for continual improvement and development of courses. In short, the new platform provides an improved learner, instructor and administrator experience by providing a custom platform designed and built with our institution's short course community's needs at its core. Whether courses are taken for enjoyment, to kickstart a career or to advance skills and knowledge, our focus will be on providing consistent learning experiences across all our short courses.

The Short Courses Platform aligns closely with the <u>University Strategy 2030</u>, the <u>University Digital Strategy</u> and <u>Data Driven Innovation</u> (DDI):-

a. Strategy 2030 states that we will offer an excellent student experience, userfriendly and efficient services and improved digital outreach enabling global participation in education.

b. University Digital Strategy is putting the user experience and accessibility at the centre of educational technology development, decision-making and procurement; leadership in learning, teaching, digital skills and web accessibility and service enhancement, upgrade, or end-of-life requirement.

c. DDI 15-year talent targets aim to engage over 700,000 people in data-science related courses, with 100,000 to be certified. This project will provide the capabilities to support those non-credited goals.

- B. Reason for Equality Impact Asessment (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: Melissa Highton

Job title: Director of Learning, Teaching and Web Services

School/service/unit: Information Services

**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?

The Short Courses Platform is available to staff, learners and to members of the public, therefore it has the potential to impact all nine of the protected characteristics. In this document we will first describe how all protected characteristics have been considered in the consultation, development and implementation phases of the Programme. We will then describe additional impacts on each protected characteristic in turn.

The Short Courses Platform will provide a streamlined approach to non-credit bearing courses across the University, and so there are a number of activities that may positively impact **all protected characteristics**:

• Terms and Conditions outline 'Learner Conduct Expectations' which include inclusivity and respect to other learners. This has the potential to positively impact all protected characteristics. Learners will agree to avoid any conduct

(including academic misconduct) which would constitute unacceptable behaviour under the University of Edinburgh <u>Code of Student Conduct</u>.

- At the planning stage, <u>eight audience insights</u> were developed, based on real learners and learner data. Understanding our audience has been a key part of our approach of inclusive design from procurement to implementation. The audience insights developed were based on a range of previous research, UX work and insights/ engagement with Schools and Departments across the University. The audience insights take in to account all potential learners and their needs for the website, including accessibility issues. The new short course website will be fully manually accessibility checked against the Web Content Accessibility Guidelines 2.2AA standards
- The Short Courses Platform caters to a group of learners whose demographics are often different from the University's matriculated students, as shown from previous data gathering. This difference is what increases the diversity of our community of learners. This aligns with the second point in the 2030 University Strategy.
- The Short Courses Platform provides universal learning for all, and most courses are available to anyone aged 16 and over. Teaching under 16s would require additional safeguarding measures and PVG (Protecting Vulnerable Groups) membership for teaching staff.

Staff training will take account of different learning styles; staff training locations and times are diverse; training materials will be in different formats e.g. video + via <u>Short Courses Platform Hub</u>; clear instructions for course delivery and content will be provided.

- Good practice guidance for staff creating courses is focussed on equality, diversity and inclusion, specifically how to make your content accessible but also includes guidance such as ensuring photography and other imagery is accessible with alt-text, shows diversity, and how to feature representative content.
- The Short Courses Platform enquiry team (Centre for Open Learning) will provide central support for some issues. They will respond to and triage all enquiries raised through the web catalogue and received by email via **enquiries.shortcourses.ed.ac.uk**, and provide some in-person support (see Reception <u>Opening Hours</u>) should a person not be able to access online resources.
- A learner registration form will be presented to the learner when they enrol onto a course. For first time registration, the fields will be blank. Once the data is entered by the learner, it will be linked to the learner's profile on the Short Courses Platform. When existing learners log in to enrol onto a new course they will be presented with the data they previously entered, which can be updated where necessary.
- The learner enrolment data can be extracted from the Short Courses Platform to enable schools/areas to meet their reporting needs. This data could also be extracted to enable profiling and reporting by UoE.
- Where funding is available for course delivery or learner enrolments the University is required to collect data, including equalities data, for reporting to

the relevant funding body(s). This includes Data Driven Innovation (DDI) programmes that are contractually obliged by their funders (Edinburgh and South East Scotland City Region Deal) to provide equalities information including age brackets, disability, ethnicity and gender of programme participants. This allows them to benchmark activity against national data sets. If an area is identified as being under represented, the relevant teams will be notified and instructed to adjust their marketing strategies accordingly. Gender and year of birth are also collected for learners applying to COL short courses, again for reporting and monitoring purposes. The aim of this is to ensure learners are not disadvantaged as a result of their age, disability, ethnicity or gender.

- It has therefore been agreed with the University's Governance and Strategic Planning group that year of birth, disability, ethnicity and gender data will be collected for all learners registering for Short Courses with the exception of private bespoke courses (that will collect name and email only). This will allow Schools to better understand their learner community and adjust marketing strategies to promote diversity. Data conventions will be consistent with Registry Services – Student Systems.
- Further details of what information is collected can be found in the Short Courses Platform Data Protection Impact Assessment.
- Staff who have devolved roles on the Short Courses Platform must have up to date Data Protection training.

In addition, there are some elements of the Short Courses Platform that may impact specific protected characteristics:

### Age

For the purpose of DDI and EQI reporting, date of birth is captured on the sign-up form.

University of Edinburgh Short Courses are available to learners aged 16 and over due to additional safeguarding and PVG passes for teaching staff being needed for younger learners.

**Positive impact** – All (adult) age groups have been considered when designing the online registration form; if required (and with permission), another person could create an account for the primary user; courses can be booked online and some inperson at COL reception; there will be a choice of online or in-person delivery of some courses; funding support will be available for some courses for certain groups; different payment methods will be available (invoice, card payment in person, online or over the phone, bank transfer); based on learner audience insights

**Negative impact** – to use the online courses, you need access to the internet and a laptop, tablet or mobile device which may create some barriers relating to digital exclusion; some may prefer not to register online; if a person is creating an account on behalf of primary user, they should ensure the person is trusted; some learners may prefer online learning but the course might require a face-to-face element; some courses have prior knowledge required which may exclude some people based on age. University Short Courses are available to learners aged 16 and over due to

additional safeguarding measures and PVG passes for teaching staff being needed for younger learners. For this reason, and for the purpose of Data Driven Innovation and EQI reporting, date of birth will be captured on the sign-up form.

**Mitigation** – delivery mode can be used to filter and find courses on the course catalogue; information will be provided to indicate if courses are self-led or if delivered by a tutor; multiple channels will be used for information delivery; we have an enquiry handling team who will direct enquiries consistently; there is a reception desk in COL so people can visit in person to register etc; we will survey users to assess usability of catalogue / account creation process; support will be available for learners; across the suite of courses, there will be courses designed for adults of all ages, based on the Audience insights that have been developed; the University's Protection of Children and Protected Adults Policy policy applies to teaching staff; the UK has a network of public libraries, providing access to free IT facilities and other countries have similar facilities.

### Disability

**Positive impact** During the enrolment process, Learners can tick a box to indicate that they have additional support needs. The Schools will follow up individually to identify these needs and make appropriate adjustments free of charge e.g., providing resources in alternative formats. Paying for someone else is possible; some courses will be available 24/7 providing flexibility for learners.

**Negative impact** –As with any new platform, staff will have to allocate some time for familiarisation with Eduframe and Canvas, as well as time to set up courses.

**Mitigation** – Course teams already support learners with a variety of support needs. The new platform will provide a consistent approach with additional accessibility features; guidance for staff on creating accessible course materials and an inclusive learning environment by default will be included in training; accessibility will be assessed as part of QA checks; alternative formats will be available if required; the Code of Conduct will include guidance on inclusivity so that learners are supported before and during their course. The University's <u>Estate Department's Accessibility</u> <u>Policy</u> and <u>Estate Department's Policy Guidance</u> provide additional information about our approach to accessibility in all University buildings. Links to further information, for example wheelchair access for in-person courses, will be included in the Short Courses Platform Catalogue Frequently Asked Questions.

External support by University of Edinburgh will be signposted to learners; there will be a choice of online or in-person delivery for some courses; staff training locations and times are diverse; training materials will be in different formats e.g. video. Training for staff will include how to deal with complaints and respond to any issues within course delivery.

Canvas has built in accessibility settings that can allow e.g. extra time for quizzes; Canvas has been optimised to work well with screen readers such as JAWS, NVDA and VoiceOver; The Short Courses Platform will be manually tested against the Web Content Accessibility Guidelines 2.2 AA standards and accessibility statements in line with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 will be added. Where we identify accessibility issues under our control we will work to rectify these as soon as possible and where issues sit with suppliers we will liaise with them to seek solutions

Course teams are responsible for their own learner support, and there will be an accessibility email address; learners can access openly available resources; there will be a phone number as well as an in-person option for support; there will be a contact if someone needs alternative formats which will be available on request and free of charge; clear instructions for course delivery and content; alternative formats are available on request and free of charge; human corrected captions and transcripts will be provided for all audio content – for staff training as well as learner content;.

SharePoint is the Short Courses Platform information hub for staff and will host some training materials. Alternative formats will be available should these be required.

Reasonable adjustments will be put in place for any staff or students who are unable to use the Short Courses Platform and where we can't rectify this.

### Race (including ethnicity and nationality)

For the purpose of DDI and EQI reporting, ethnicity and country<sup>1</sup> will be captured on the sign-up form for paid courses. There will be an additional field to indicate "If you live in the UK, in which country do you currently live?" Where possible, fields are consistent with Registry Services - Student Systems data conventions.

**Positive** –we offer some courses (e.g. MOOCs) in other languages; if required, another person could create an account for the primary user (with permission); can use external translation tools as the content is online; videos in English will have captions; ability to study from abroad (subject to UN sanctions / country specific technology or trading constraints); asynchronous online courses can run any time 24/7, so easier for studying in a different time zone; positive guidance provided for content creators on de-colonising their content

**Negative** – Prospective learners whose first language is not English may find the course description pages or other materials difficult to understand. Even if someone else completes registration on their behalf there may still be a language barrier re course materials; language translation is not possible when making a payment; synchronous, online activities need to be scheduled to accommodate a global audience.

**Mitigation** – The University's teaching language is English so this is in line with <u>University Admissions Policies</u>; the online registration and enquiry forms have been designed from a user perspective using plain English; the COL reception team may be able to assist someone who is able to come to the office; we may consider offering more courses in other languages in future; there are multiple language options in the

<sup>&</sup>lt;sup>1</sup> https://en.wikipedia.org/wiki/List\_of\_ISO\_3166\_country\_codes

Catalogue and account set up (can be configured if needed); as long as forms are accessible the learner should be able to use translation tools on their browser

## Religion or belief

**Positive** – There will be some "asynchronous courses" i.e. courses that learners can access at any time of day. For these courses, there will be no requirement to complete activities that might clash with religious practice or holidays. We do not ask at any stage about a person's religious beliefs or lack of and no photo ID is required.

**Negative** - Synchronous online and campus activities may not always be able to be scheduled to accommodate a global audience and different religious practices.

**Mitigation** – Information about religion or belief will not be requested as part of learner registration; Good practice guidance is focussed on equality, diversity and inclusion; ensure any face-to-face training for staff is delivered on different days so staff can avoid any religious holidays or observance days if needed. The Learner Code of Conduct will be available to all learners.

## Sex

For the purpose of DDI and EQI reporting, only gender will be captured on the signup form and and there will be a 'prefer not to say' option. Fields will be consistent with Registry Services - Student Systems data conventions.

**Positive –** use of pronouns and preferred names will be advised as part of staff training; the Learner Code of Conduct Expectations will remind learners to address people as they wish to be addressed, and may provide reassurance for staff working alone; Unconscious bias training is available to staff so assumptions about sex based on a person's name will be minimised.

## Sexual orientation

We do not believe there will be any impact on this protected characteristic beyond the potential for derogatory or discriminatory remarks already covered under learner conduct expectations. Information on sexual orientation will not be collected as part of learner registration.

### Gender reassignment

**Positive –** Use of preferred names advised as part of staff training.

**Mitigation** – Only first and last name will be required as part of learner registration; Use of preferred names advised as part of staff training, pronoun and preferred name will be optional fields on the learner's profile so a learner would be able to add these if they wish to. Staff with 'contact – edit' access would be able to change a learner's name on the system. Any data provided will remain available to the learner on the Learner Portal under "Account" Details provided by learners under their account will be available to view by any administrator in Eduframe with "contact – view" permissions. The learner's name and login profile synchronise with Canvas (the Virtual Learning Environment). Learners do not have access to view each other's contact page within Canvas. Teachers can view their learner's name on Canvas. Links to further information, for example gender neutral toilets for in-person courses, will be included in the Short Courses Platform Catalogue Frequently Asked Questions.

## Pregnancy and maternity

**Positive –** Information on pregnancy/maternity status will not be collected as part of learner registration; Roles and permissions can allow for breaks in UoE staff employment; T&Cs include criteria to transfer to another course or request a refund (cancellation and exceptional circumstances), the flexibility of some online courses could benefit those that have caring responsibilities

**Negative** – The scheduling of synchronous online activities may not always accommodate the needs of individual users

## Marriage or civil partnership

We do not believe there will be any impact on this protected characteristic beyond the potential for derogatory or discriminatory remarks already covered under 'learner conduct expectations'. Information on marriage or civil partnership status will not be collected as part of learner registration

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups: Please see section E for detailed information about each protected characteristics. This EqIA has been shared for comment with the Staff Disability Network, EUSA VP Education, the Disability and Learning Support Service and Edinburgh Global.
- Any gaps in evidence/insufficient information to properly assess the policy, and how this will be addressed:
  We believe we have sufficient evidence and information to properly assess the policy in relation to the Short Courses Platform
- If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups: . For the reasons detailed above we do not believe the Short Courses Platform will lead to any form of prohibited conduct.

Reasonable adjustments will be put in place and made in individual circumstances as required

- If the policy/practice contributes to advancing equality of opportunity<sup>2</sup> The Short Courses Platform will be more accessible than previous platforms used to deliver Short Courses at the University of Edinburgh. This is addressed in Section A.
- If there is an opportunity in applying this policy/practice to foster good relations:
- It is hoped that by showing we have considered the potential impacts on the nine protected characteristics throughout this project and ongoing that we have demonstrated the University's commitment to Equality and Diversity and inclusivity.
- If the policy/practice creates any barriers for any other groups?

# Socioeconomic background

**Positive** – Some online courses are free of charge; for some courses we offer a range of payment methods; it is possible to pay for someone else; funding/discounts are available for some groups and some courses; for some courses, ability to choose a delivery format (online, face-to-face, hybrid) according to someone's preference; there will be some asynchronous courses that run any time 24/7; ability to study a course when working part or full-time; the UK has a network of public libraries, providing access to free IT facilities and other countries have similar facilities; ability to run courses using mobile phone and lower cost technology

**Negative** – The scheduling of synchronous online activities may not accommodate the needs of individual users; course fees do not cover course materials such as textbooks; expenses such as travel maintenance or purchase of computer software or hardware required to undertake the course; need access to reliable broadband to complete online course; we need to make sure the courses are affordable

**Mitigation** – Being able to download content so can work offline. Many of our short courses and MOOCs (Massive Open Online Courses) are free. Flexibility around delaying or deferring payments is available for some courses, as are funded places. If a learner has an issue with payment, they can contact the SCP enquiry team.

- How the communication of the policy/practice is made accessible to all groups, if relevant?
  - Different methods of contacting the University of Edinburgh about short courses will be available. There will be a clear process, ownership and SLAs re enquiries from prospective learners on how quickly we will respond so we are clear and transparent. There will be FAQs on the short courses web page to assist learners with common questions. Alternative formats

<sup>&</sup>lt;sup>2</sup> This question does not apply to the protected characteristic of marriage or civil partnership

will be available on request, free of charge, the platform will be tested against WCAG 2.2 AA standards and accessibility statements in line with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

- Our marketing materials reflect our wide-ranging audience of learners, including those with protected characteristics. This is not just in the imagery that we use but also in the language we use. We will draw on our eight "audience insights" to ensure that our marketing materials are suitable for and relatable to by all groups. In digital advertising we can target some of the protected characteristics e.g. age or gender to ensure a balanced marketing approach. We can measure engagement with our adverts and, if required, can adjust our targeting to be more inclusive. Alternative formats will be available free of charge upon request.
- How equality groups or communities are involved in the development, review and/or monitoring of the policy or practice?

At the planning stage, <u>eight audience insights</u> were developed, based on real learners and learner data. Understanding our audience has been a key part of our approach from procurement to implementation. The audience insights developed were based on a range of previous research, UX work and insights/ engagement with Schools and Departments across the University. The audience insights take in to account all potential learners and their needs for the website, including those with accessibility issues. The new short course website will be fully accessibility checked to ensure it is fit for use by all potential users.

Further to this we will engage the Disability and Learning Support Service, EUSA, the Staff Disability Network and Edinburgh Global in discussions prior to full launch of the platform; a draft of this EqIA was shared with them in July 2024.

- The early adopter phase prior to full implementation includes feedback, and any comments related to the protected characteristics (positive or negative) will be reviewed and acted on accordingly. After full implementation, we will continue to monitor all feedback for any comments positive or negative related to any of the protected characteristics and act accordingly.
- 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:

The Short Courses Platform increases diversity of the University community by attracting a broad range of learners, the vast majority of whom are not matriculated students. It eliminates barriers by allowing learners to experience University teaching without enrolling in a full degree.

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 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).

The draft EqIA will be circulated to the Short Courses Platform Learning and Teaching and Implementation Working Groups to baseline. A summary will then be shared with the Project Board for approval. It will then be published.

Staff will be reminded of the need to make reasonable adjustments and provide information in alternative formats.

The Short Courses Platform team keep up to date with developments from the vendor that may have a positive or negative impact on the 9 protected characteristics. They will also monitor positive or negative feedback related to any of the protected characteristics.

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

Forms and data points will be reviewed on an annual basis by the Short Courses Platform team, when there is any significant change or upgrade to the Short Courses Platform or if we receive any positive or negative feedback related to any of the protected characteristics.

**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)):

Karen McPhail (Business Analyst), Dave Baskill (Senior Project and Programme Manager), Katie Grieve (Data and Equality Officer), Nicol Smith (Business Support Manager) with input from the Short Courses Platform Project team.

Accepted by (name): Melissa Highton, Assistant Principal Online and Open Learning, Information Services, University of Edinburgh Date: [18 February 2025]

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