

**GSA SUMMARY REPORT OF EQUALITY CONSIDERATION AND ASSESSMENT OF EQUALITY IMPACT**

Date of Assessment:	<b>2 September 2020</b>	
School or Executive Group Area:	Institution Wide Policy	
Department:	Cross GSA Proposal	
Lead member of staff: e-mail:	Shona Paul <a href="mailto:S.Paul@gsa.ac.uk">S.Paul@gsa.ac.uk</a> as Convenor of Digital Inclusion Panel	
Area of decision making/title of policy, procedure, programme or relevant practice:	Digital Inclusion Policy	
Please indicate if this is:	New:	<input checked="" type="checkbox"/>
	Existing/Reviewed:	<input type="checkbox"/>

**1.Summary of how equality, diversity and participation have been considered and due regard given to the Public Sector Equality Duty (PSED):**

The Digital Inclusion Policy was developed in response to the embedding of remote learning using digital resources in the undergraduate and postgraduate curricula. The EIAs completed for the shift to Hybrid Learning and the Digital Poverty Proposal (now referred to as Digital Inclusion) have been used to inform the development of this Policy. This Policy provides a framework to manage and support the implementation of the Digital Inclusion Proposal which “works to directly address issues with equality of access and equality of participation through the provision of appropriate IT resources to students identified as being affected by Digital Exclusion”.

As suggested in the Digital Inclusion Proposal, this Policy has been designed with eligibility criteria that do not “make assumptions of students based upon their protected characteristics and SIMD classifications”. The Policy is inclusive of students coming to GSA from outside the UK and open to all UG and PGT students therefore promoting equality of access for all

The Digital Inclusion Policy 2020-2021 is in place to offer the long term loan of Glasgow School of Art laptops to students to enable them to study online, where they may be unable to access this equipment otherwise due to financial hardship, digital exclusion, or other relevant circumstances.

The Application Process detailed in the Policy includes the review of requests for support on an individual basis, and is measured against a series of criteria to ensure that those in most need of the support receive it. Applicants may apply online or through other means if an online application is not feasible. The Application form will be designed to meet accessibility requirements and students may request support to complete the form so no student is further disadvantaged by the process itself. A ‘gathered field’ approach is being taken to the application process and is seen as the basis for a fair and equitable distribution of the laptops where demand could possibly outstrip supply and support those most in need.

The Policy details the provision of a laptop and appropriate software for those who are able to evidence financial hardship, digital exclusion, or other relevant circumstances to support the recipient’s study at GSA. As noted in the Hybrid Learning EIA, the Policy requires that the specifications of the laptop and software will be appropriate to the recipient’s programme of study and allow access to the online platforms they will require for study. A standard specification has been developed across all laptops, with access to more specialised subject specific software available as required at programme level.

Students in receipt of a laptop will be provided with guidance on how to use the device and will be eligible for IT support for the duration of the loan. Any guidance or instructions provided by IT must be inclusively designed and provided in a variety of formats. If the student identifies additional learning needs not already supported by equipment provided through Student Support, the laptop should accommodate these needs and be set up accordingly.

## **2.Evidence used to make your assessment:**

In developing this proposal, a number of data sources were analysed in order to determine the scope of provision required and the potential impacts of digital exclusion on equality of access and participation.

Student demographic data, including SIMD20, SIMD40, care experience and socioeconomic criteria as identified by POLAR categories for RUK students, were used to model the percentage of students who may require additional support with IT equipment. It was recognised that some students outside of these groups may also face the effects of digital exclusion, and some students within these categories may not be impacted. As such these groups will not be automatically used to assume need, with assessment of needs being undertaken at the individual level using clear criteria and fair processes as detailed in the Digital Inclusion Policy. It seeks to minimise the evidence necessary to support the application by using supporting material that has already been used to identify the student's personal circumstances.

In addition, data was used from a recent survey of current PGT students, as a benchmark to determine access needs at PG level within the cohort. This survey was taken as part of the switch to online learning at the start of the covid lockdown.

An assessment was made of IT requirements for all UG and PGT in order to establish a baseline specification, including the provision for student to run assistive software. This has informed the specifications for the laptops that will be provided for eligible students.

The 2019 Office for National Statistics Report *Exploring the UK's Digital Divide* explores internet access for a range of protected characteristics including age, gender, disability and ethnicity. It charts the closing of the gap in access in most groups including age, where access is lowest for those over 65. As GSA includes students over 65, this eligibility criteria included in this Policy do not discriminate on the basis of age. According to their statistics, the highest percentage of non-users were White with greater access amongst BAME groups. This supports the assertion that assumptions of need should not be made along the lines of protected characteristic.

The Cambridge Centre for Housing and Planning Research's four-year study of digital exclusion revealed that: "The likelihood of having access to the internet from home increases along with income, such that only 51% of households earning between £6000-10,000 had home internet access compared with 99% of households with an income of over £40,001. The link between poverty and digital exclusion is clear: if you are poor, you have less chance of being online". This report goes on to discuss the prohibitive cost of wifi and data, the lack and/or sharing of digital equipment within households as well as the impact of these on digital literacy and equity.

The primary issues are the high cost of connecting to the internet and the number of households without access to a computer.

Therefore, the Eligibility Criteria detailed in the Policy are based on established measures of financial hardship as it is the primary barrier to digital inclusion for our students. Since Lockdown

commenced, the digital divide has been revealed and examined by most media outlets, government offices and third sector groups. Finance is the primary barrier for GSA students accessing appropriate digital equipment. Therefore, criteria that consider finance and/or contexts that affect an ability to access money such as estrangement or care experience, have been used to determine eligibility. The £34,000 household income figure is informed by the Student Awards Agency Scotland ([SAAS upper limit for bursary funding](#)) for young students. Student finance for students outside of Scotland also uses [household income](#) to determine eligibility for government-funded loans and grants. Like Scotland, [Wales](#), England and Northern Ireland all use a household income threshold to determine eligibility to grants and/or additional funding. Living circumstances also impact funding in [England](#) and [Northern Ireland](#). [Care experienced](#) and [estranged students](#) are also recipients of additional HE funding and support.

Finding standard measure for students will not be likely so enabling them to produce the relevant evidence from their own context in line with the thresholds set for RUL students will need to be monitored to maintain as equitable and fair distribution of the laptops.

**3. Outline any positive or negative impacts you have identified:**

*Positive impacts:*

The fundamental purpose of this Policy is to address issues of equality – to ensure that all students are able to access online learning at the GSA, and enjoy parity of access and experience with their peers. In acknowledging that the digital divide exacerbated by Covid presents a barrier to success, this policy proposes processes to support students at risk of financial hardship, digital exclusion, or other relevant circumstances during the current emergency as well as those in the future.

The Digital Inclusion Policy and related procedures have a positive impact: the fund accepts applications from eligible students regardless of age, disability, gender reassignment, marital/civil partnership status, race, religion/belief or sex.

The processes detailed in the Policy use appropriate measures to assess eligibility fairly and without discrimination on the basis of protected characteristic.

Potential negative impact:

As detailed in both the Policy and the initial Digital Inclusion Proposal, the supply of equipment is finite, so it is possible that some eligible students may not receive the equipment or support they require. The best attempts have been made to gauge actual numbers of who may need this support to model the proposal and purchasing of laptops.

There will be a gathered field approach for application and this is a way of managing the chances of demand outstripping supply to ensure machines are provided for those requiring them the most. In the event that demand outweighs supply, further strategies will be considered .....

As the offer considers SAAS related (and equivalent bodies in), the evidence base has already been provided and students categorised as require financial assistance. This helps to make the collection of information less burdensome for the student as it will align with these classifications and not require seeking additional levels of information they may not readily have access to.

A lack of similar standardised information from EU and international students is problematic and should be closely monitored by the Digital Inclusion Panel.

**4. Actions you have taken or planned as a result of your findings:**

(Please complete the action plan in this section)

Action	Equality Impact	Person responsible	Time frame
<p>Policy, Guidelines for students and accessible application created.</p> <p>Clear, accessible communication strategy agreed.</p>	<p>Clear information available for all students regarding application process and eligibility requirements. Students who do not meet eligibility requirements are directed to alternative avenues of support therefore advancing equality regardless of protected characteristic or domicile.</p>		
<p>Agree a manageable and accessible, clear and equitable application process with clear criteria, support where required, and in a timely manner</p>	<p>Remove or minimise disadvantages suffered by people due to their protected characteristics.</p> <p>Eliminate discrimination, advance equality and meet the diverse needs of students and staff.</p>	<p>Digital Steering Group</p>	<p>Early Oct</p>
<p>Ensure equipment provided is accessible and appropriate to programme and student needs</p>	<p>Advance equality and meet the diverse needs of students and staff.</p> <p>Remove or minimise disadvantages suffered by people due to their protected characteristics.</p>	<p>IT</p>	<p>Already met</p>
<p>Provide and technical support for recipients of loan</p>	<p>Advance equality and meet the diverse needs of students and staff.</p>	<p>IT</p>	<p>As laptops are collected</p>
<p>Provide support for internet access as part of Digital Inclusion</p>	<p>Eliminate discrimination, advance equality and meet the diverse needs of students and staff.</p>	<p>IT</p>	<p>On receipt of requests via the online IT helpdesk</p>
<p>Ensure that all aspects of the application and implementation process consider GDPR</p>	<p>Remove or minimise disadvantages suffered by people due to their protected characteristics.</p>	<p>Shona Paul via the GDPR Forum</p>	<p>Mid Sept</p>
<p>Monitor the protected characteristics of applicants.</p>	<p>Eliminate discrimination and advance equality regardless of protected characteristic.</p>		

**5. Where/when will progress and the outcomes of your actions be reported and reviewed:**

The implementation of actions arising from this EIA will be monitored by UPC in Jan 2021, with a review for SLG and Board of Governors in Mar 2021. The policy will be the overall responsibility of Deputy Director Academic with the review being considered by SLG, Academic Council and subsequently the Board of Governors.

**6. How will your actions and intended outcomes contribute to the delivery of GSA's equality outcomes:**

Key to the development of this proposal is the principle of equal access and equal participation for all students studying at the Glasgow School of Art. As such this proposal will support the following equality outcomes:

- Equality Outcome 2: An inclusive and accessible environment in which the diverse needs of students are systematically anticipated and provided for.
- Equality Outcome 3: An increase in the number of students from currently under-represented groups and achieving successful outcomes.

These outcomes are supported through the provision of additional resource to ensure equal access and equal participation in response to students impacted by digital exclusion.

**The outcome of your assessment:**

No action (no potential for negative or positive impact)

Action to remove barriers/mitigate negative impact

Action to promote positive impact

**Sign-off, authorisation and publishing**

**Review Lead**

Name	Shona Paul (as Convenor of Digital Inclusion Panel)
Position	Head of Professional and Continuing Education
Signature	
Date	3/9/2020

**Executive Lead**

Name	
Position	
Signature	
Date	

**Equality Lead (Head of Student Support and Development)**

Signature	
Date	