Equality Impact Assessment

Virtual Learning Environment for Sport

Introduction

At **sport**scotland, equality impact assessments (EQIAs) help us identify and understand the equality impact of our work.

Through the EQIA process, we consider evidence relating to people who share protected characteristics and develop actions to take account of the results.

An equality impact assessment (EQIA) of **sport**scotland's **Virtual Learning Environment (VLE) project** was carried out in the summer and autumn of 2020 (June-October). This document provides a summary of the approach and findings of that assessment.

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About the policy

Scope and background

Following internal and external consultation, **sport**scotland committed to leading the procurement and implementation of a **Virtual Learning Environment (VLE)** for the sport sector.

In April 2020, **sport**scotland procured the D2L's Brightspace system. It is for **sport**scotland and partners to deliver online education, training and CPD to people working or volunteering in sport, athletes and their families.

The Brightspace system, along with Course Merchant (online payments) and Bongo (virtual classrooms) make up **sport**scotland's VLE.

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About the policy

Who will use Brightspace in year one?

14 Scottish governing bodies of sport (SGBs) are ready to implement the Brightspace VLE over the first 12-month period. SGBs will have the opportunity to engage with the system on one of these 3 ways:

- **"Shared"** become a department within the **sport**scotland site
- **"Supported"** are a separate site supported in administration by **sport**scotland
- **"Independent"** SGBs that take up their own individual account

As well as SGBs - the **sport**scotland institute of sport, Glenmore Lodge national outdoor training centre and external partners, Commonwealth Games Scotland, will also adopt the Brightspace platform in year one.

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About the policy

Business Plan 2019-2021

Going into this period, we prioritised the development of systems and processes for education and learning. The VLE project is about providing digital infrastructure for learning and development in sport.

Sport For Life – Our Corporate Strategy

At **sport**scotland, inclusion underpins everything we do. We believe this means ensuring people feel they belong and are welcome, engaged, and connected. It is about valuing all individuals, giving equal access and opportunity to all and removing discrimination and other barriers to involvement.

Contribution of the VLE

It is our intention that the VLE allows us to widen access to our learning content. Our VLE should offer greater flexibility of access to learning content and enable us to reach larger numbers of learners, even in dispersed locations. The VLE will also provide a digital platform for sharing content designed to improve knowledge and behaviours that impact on the inclusiveness of sport.

It is the EQIA process that will support us to review and identify any actions required to achieve, these aims.

VLE implementation timeline

July–September 2020

Pilot of onboarding process for SGBs

- Seek and secure feedback, collaborate with the learning design team and make necessary improvements
- Actively promote some content during this phase - Child wellbeing and protection course.

Launch

- sportscotland (including SIS and Glenmore lodge)
- SGBs (including Scottish Swimming, Scottish Canoe Association, SDS, Horse Scotland and Netball Scotland).

October 2020

Evidence Summary

We reviewed a broad range of evidence to inform our assessment the impact of the VLE.

We reviewed evidence from the following bodies of research:

- Inequalities in Scotland

- Digital exclusion

- Digital accessibility and The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations, (2018).

Evidence Summary

Structural inequalities

Each protected characteristic is a **structural factor** in the distribution of power, resources and opportunities. The unequal distribution of power across the population is one of the fundamental causes of a wide range inequalities including health, education and income.

Each characteristic is woven into our ideas and perceptions of almost all areas of life. We know that these structural inequalities are woven into the demographics of people who are included and part of the sporting system (**included groups)** *and* those that are not (**excluded groups**).

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Evidence Summary

Digital exclusion

Digital exclusion is where a section of the population have continuing, unequal access and capacity to use information and communications technologies (ICT) that are essential to fully participate in society (Schejter, 2015 ; Warren, 2007).

This area of research is concerned with people being able to use digital technologies, particularly the internet, in ways that enhance their lives and contribute to helping them overcome other disadvantages which they might face (The Wales Co-operative Centre with Carnegie UK Trust, 2018).

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Evidence Summary

Digital exclusion

Research has identified several important barriers to digital inclusion that will affect some people's ability to access our VLE:

- **Access**: not everyone has the ability to connect to the internet and go online
- **Skills**: not everyone has the ability to use the internet and online services
- **Confidence**: some people fear online crime, lack trust or don't know where to start online
- **Motivation**: not everyone sees why using the internet could be relevant and helpful
- **Design**: not all digital services and products are accessible and easy to use
- **Awareness**: not everyone is aware of digital services and products available to them

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Evidence Summary

We know some sections of the population are more likely to be digitally excluded than others.

The 2019 Consumer Digital Index shows:

- 11.9m people (22% of the population) **do not have the digital skills needed for everyday life in the UK**

- **people with a disability** are 35% less likely to have essential digital skills for life

Evidence Summary

In Scotland, the proportion of internet users had increased since the questions were first asked in 2007 (to 88% of all adults in 2019).

However:

- Among **older people** the proportion of internet users is significantly lower than the Scottish average.

- Only half of those over 60 in **the most deprived areas** used the internet, while 83% of those over 60 in the least deprived areas did.

- Among **younger people** the difference between area deprivation was smaller, but it was still significant.

- 96% of those between 16 and 34 in the most deprived areas used the internet, while 100% of those in the least deprived areas did.

Evidence Summary

The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations, (2018)

These new <u>accessibility regulations</u> have transformed digital accessibility standards for public sector bodies. They aim to help make sure online public services are accessible to all users, **including disabled people**. They challenge us to make sure the digital parts of the services we design and build for the people of Scotland, are done so with accessibility at their core.

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Evidence Summary

The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations, (2018)

This legislation is important as:

- Over 20% of the UK's population live with a long-term illness, impairment or disability according to the latest Government statistics. And EU data indicates that 5% of EU citizens do not use the internet at all because of a disability.

- Evidence shows that disabled people cannot use many UK websites because they are not accessible. A recent study found that 4 in 10 local council homepages failed some basic accessibility tests

- A third of the sites were marked down because of movement on the screen - such as rolling images or words. This can affect people with a cognitive-impairment such as dyslexia, as well as people with low vision, and blind people using screen reading software.

- Sites were also marked down for lack of good heading structure (63%), no appropriate text alternatives for images (39%), and insufficient colour contrast (49%).

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References

- https://digital.nhs.uk/about-nhs-digital/our-work/digital-inclusion/what-digital-inclusion-is

- Office for National Statistics - Exploring Digital Divide 2019

- Scottish Household Survey 2019

- https://socitm.net/

- https://www.abilitynet.org.uk/news-blogs/4-10-uk-council-websites-inaccessible-millions-people-dyslexia-sight-loss-cognitive

- The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018

- Schejter, 2015

- Warren, 2007

- The Wales Co-operative Centre with Carnegie UK Trust, 2018.

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Action plan

Actions completed to date

Group members have already implemented actions, informed by the EQIA process:

- Accessibility messaging and training resources have been embedded into the SGB onboarding process.

- "Intro to digital accessibility" workshop has been delivered to the comms team

- Plain English module has been uploaded to MY Learning for **sport**scotland staff

- The external publishing process, including details of digital accessibility, has been shared with leadership group and our internal digital newsletter Inside Track

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Configuration and set up

As a guiding principle, we should focus on achieving **consistency of experience** for users across the different systems that make up the VLE. This principle should also extend to any new or additional systems we adopt to complement the Brightspace product.

We should prioritise:

- user logins, search functionality and user interface conventions.

- templates – building in controls and guiding authors to create accessible content within the authoring process/interface

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Implementation

System accessibility checks will be built into the VLE implementation plan. These will:

- sit alongside the planned, 6 monthly security compliance checks.

- complement the reports provide by our supplier, D2L and include: Valid HTML and WCAG 2.1 AA standard accessibility

- publish and maintain system level accessibility statement including mobile app / responsive access

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Action plan – January 2021 to January 2022

Content

sportscotland's communications team will be responsible for ensuring the VLE content provided:

- Meets the current web accessibility guidance and includes content accessibility statement

- Is in line with the sportscotland brand guidelines

- Reflects the sportscotland tone of voice

- Develop style guides for each content type

- Develop publishing approval process

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Action plan – January 2021 to January 2022

User testing

- We will plan and design system testing with end users (including people who use assistive technology). User testing will inform improvement of usability and accessibility of the VLE system and content.

- We must deliver this within the next 12 months as this is the window of opportunity to make improvements before the volume of users and content is established.

- This activity is an opportunity to develop working relationships and collaboration with organizations working with under-represented or excluded groups.

Action plan – January 2021 to January 2022

User feedback

We must make it easy for users to provide feedback on all aspects of their use of the system. We will:

- Include page feedback on the VLE platform (LD)

- Implement a process for monitoring and reviewing end user accessibility issues (DM/JW)

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Action plan – January 2021 to January 2022

Staff training and support

We should provide resources to improve our sectors knowledge, understanding and practice in relation to digital accessibility. These should not duplicate resources provided by our suppliers. They should reach staff across the sector who have not been part of the onboarding process. We suggest three key actions:

- Update all current guidance and templates (copy style guide, template docs etc).

- Develop a style guide for each content type

- Adopt a resource such as SCULPT. This guidance resource is structed around an acronym that covers the key areas of accessible, compliant content creation. It is relevant to anyone who drafts documents - on or off-line.

Consultation

Internal	External
Darren McKay / Michelle Borland (complete)	Open University (Complete)
Wider VLE Project Group (Complete)	JISC (No capacity to support)
Kate McCheyne, Head of Communications (complete)	Uni of Highlands and Islands (Brightspace customer) (No capacity to support)
Callum McInnes, HR Manager (complete)	Lead Scotland (No capacity to support)

Sign off

Senior management team – March 2021