Glasgow Kelvin College

Equality Impact Assessment

ICT Acceptable Use Policy - 2021

Contents

Practitioners conducting assessment		
Name	Designation	Date
Andrew Laszlo	ICT Technical Manager	27.04.21
Doreen Shiels	Director of Human Resources	27.04.21

Step 1 – Identification and Scope

Brief description of the decision, policy or practice being assessed

The purpose of the ICT Acceptable Use Policy is to outline the acceptable (and prohibited) use of College computer equipment and network access. Inappropriate use exposes the College to risks including virus attacks, compromise of network systems and services, and legal issues. The Policy was introduced in 2013 after merger and has been reviewed in accordance with the Policy review schedule. This is the revised EIA for the review conducted in 2018.

Aims of the decision, policy or practice?

The Policy addresses the need to protect the College and its Users' data, balanced with the need to protect the rights of learners, staff and partners. The Policy is intended to Users and the College as a whole from illegal or damaging actions by individuals, either knowingly or unknowingly. The inappropriate use of the Policy will be managed in accordance with the College's policies and procedures and reported to external bodies when appropriate.

The policy ensures compliance with the GDPR, Cyber Essential Plus accreditation and supporting procedures, policies and practices.

Who is affected by the decision, policy or practice?

[x] Students

[x] Staff

[x] Members of the public/Stakeholders

Step 2 – Research and Consultation

Outline evidence / research

> College ICT and Network systems
> File Storage: Guidance for Staff
> Charter for System and Network Administrators Janet. It is endorsed by the Universities and Colleges Information Systems Association (UCISA).
> Password Change Procedure
> Computer Misuse Act 1990
> Consumer Protection Act 1987
> Data Protection Act 1998
> The Equality Act 2010
> EC Directives on Waste Electrical and Electronic Equipment (WEEE)
> Freedom of Information Act 2002
> Health and Safety at Work Act 1974
> Copyright, Designs and Patent Act 1988
> Protection of the Environment (Environmental Information Regulations 2005)
> Regulation of Investigatory Powers Act 2000
> The Telecommunications Regulations 2000 (Lawful Business Practice) (Interception of Communications)
> GDPR Legislation
> Cyber Essentials Plus
> Scottish Government's Cyber Resilience Strategy

What consultation has been undertaken on this policy or practices, including consultation with those affected?

Trade Union – Unison.
Trade Union – EIS/FELA.
College Managers.
HR
Equality, Diversity and Inclusion Manager
Learners - focus groups
Staff – focus groups
Members of SMT

Research Key Findings

Several changes were made to this document after consultation in two key areas, misuse and breach of the Policy and cyber-security, the amendments include:

- Section 2: clarification on:
  - acts which can be construed as misuse and a breach of the Policy; and
  - accessing service or data remotely
- Section 3: additional information on security including a new section on Cyber Security to increase staff's understanding around cyber security and to better protect the College and their personal digital identify outside of the work.

Links to advice and training were included. The College n ow provide an online Cyber Security module which is compulsory for all staff.

Is there any evidence that different groups have, or may have, different needs, experiences and priorities in relation to this policy or practice?

Protected Characteristic	Yes (+ or -)	Potentially (+ or -)	Neutral (no impact)	Not known
Age			+	
Disability			+	
Gender			+	
Gender reassignment			+	
Marriage and Civil partnership			+	
Pregnancy and Maternity			+	
Racial group			+	
Religion or belief			+	
Sexual orientation			+	

Step 3 – Assessing the Impact

What impact could the proposal have on people who share protected characteristics (positive, negative and/or neutral?) Please provide details below.

Protected Characteristic	Likely Impact
Age	The policy applies to all regardless of age and protects the interests of all staff.

Protected Characteristic	Likely Impact
Disability	The policy applies to all regardless of disability and protects the interests of all staff. It is available on intranet and therefore available in different fonts, text size and through assistive technology.
Gender	The policy applies to all regardless of gender and protects the interests of all staff.
Gender reassignment	The policy applies to all regardless of gender reassignment and protects the interests of all staff.
Marriage and Civil partnership	The policy applies to all regardless of marital status and protects the interests of all staff.
Pregnancy and Maternity	The policy applies to all regardless if the woman is pregnant or is/has been absent previously on maternity leave.
Racial group	The policy applies to all regardless of race and protects the interests of all staff.
Religion or belief	The policy applies to all regardless of religion or belief and protects the interests of all staff.
Sexual orientation	The policy applies to all regardless of sexual orientation and protects the interests of all staff.

Step 4 – Taking Action

Detail the actions you would take to remove or minimise any actual or potential negative impacts identified, and to build positive impacts.

Policy issued to all existing staff to raise awareness through self-service staff portal;
Policy issued to all new staff and learners as part of induction process;
Policy available on the intranet and internet;
Users are required to confirm their acceptance of the policy before logging on to a networked College system or the 'Bring Your Own Device' WiFi system;
Training for managers in managing disciplinary matters which arise associated with the implementation of the policy;
Monitoring and reporting of policy application to the Board of Management, Teaching and Learning Committee and HR Committee;
Compulsory online Cyber Security Module for staff
ICT Advisory Committee in place; and
External guidance through Janet.

Step 5 – Monitoring and Evaluation
Identify how this policy will be monitored and any areas of concern reported.

Monitoring and evaluation: • Informal discussions with staff and managers; • Formal consultation with staff, managers and Trade Union representatives; • Staff surveys; and • Any recorded incidents, complaints or disciplinary matters.

Please present your EIA with recommendations for endorsement. All EIAs will be published on the Portal and added to the current record of EIAs.

Step 6 – Approval – Equalities Committee
Identify outcome

A. Proceed – • no potential identified for discrimination or adverse impact, and: • all opportunities to advance equality have been taken.	Yes
B. Proceed with adjustments to: • remove barriers identified or • better advance equality.	
C. Stop and rethink as actual *or* potential unlawful discrimination has been identified.	

Approved	**Yes**
*Not Approved and Requires Further Information	

Please add Comments

Person(s) responsible

Name	Designation	Date
Patricia Currie	EDI Manager	29.04.21
Monica McKerlie	Head of Learner Services	29.04.21

Signed …………………………………………… Date ……………

Signed …………………………………………… Date ……………

Central Monitoring

 Once your EIA is complete:
1. add it to the EIA monitor on the Equalities Section of the Intranet
2. In Col A. Insert Title **and** Hyperlink Doc

NB: Finalisation of central monitoring & identification of compound impact will be undertaken within Equalities Management.

Appendix

Equality Act General Duty requires colleges to have **due regard** to the need to:

1. **Eliminate**
a) discrimination,
b) harassment,
c) victimization; or
d) any other prohibited conduct

2. **Advance** equality of opportunity by
a) removing or minimising disadvantage
b) meeting the needs of particular groups that are different from the needs of others
c) encouraging participation in public life

3. **Foster** good relations – tackle prejudice, promote understanding

Protected Characteristics:

1. Age
2. Disability
3. Gender Reassignment
4. Marriage And Civil Partnership (applies only in relation to (1a) discrimination in *employment*, not to learners)
5. Pregnancy And Maternity
6. Race
7. Religion Or Belief
8. Sex/ Gender
9. Sexual Orientation.