

Equality Impact Assessment

Glow

December 2023

Equality Impact Assessment Record

Title:	Glow – National Digital Learning and Teaching Platform
Senior Lead Officers	Emma Pollock
Directorate: Division: Team	Education Scotland Digital Services
Is this new programme or revision to an existing programme?	Revision of an existing programme

Screening

This Equality Impact Assessment (EQIA) aims to assess Glow which is a national digital learning and teaching platform provided by Education Scotland's Digital Services programme.

Glow is in use across Scotland's schools, by learners, teachers and other staff. It is available for use by all schools in Scotland although its use is entirely optional and not mandated by Scottish Government.

It has been existence in a range of forms since 2006 and is a continually evolving offering.

Glow provides access via an authentication platform provided by RM Unify to several core products (Microsoft 365, Google Workspace for Education and WordPress blogs) and other educational apps that allow users to create, collaborate and innovate.

Glow potential usage is every learner, teacher and education staff member in Scotland. Access to Glow is often decided upon by the local authority and then within the school and then by the teacher. Pupils have access due to them being provided access by these decision makers and are not able to register themselves. There are over 250K of unique users of Glow each month who use a variety of elements of Glow.

The Scope of the Equality Impact Assessment

In undertaking this assessment, Education Scotland has assessed the impact on each of the protected characteristics and has considered measures against the three needs of the general equality duty as set out in Section 149 of the Equality Act 2010 to:

- eliminate unlawful discrimination, harassment, and victimisation;
- advance equality of opportunity; and,
- foster good relations.

Key Findings

This assessment has identified some areas where Glow is at risk of having negative impacts on some protected characteristics and these have been noted below.

What might prevent the desired outcomes being achieved?

Existing contractual agreements with suppliers may limited the changes that can be made in the short to medium term. Also the use of a wider service

rather than anything entirely bespoke to Glow of some components may limit the changes that can be made.

Stage 1: Framing

Results of framing exercise

As a result of our framing exercise, we identified that there was potential for the ongoing delivery of Glow to have impact on some protected characteristic groups, either negatively or positively.

Protected characteristic: age

Whilst it is not believed that age dictates the level of digital skills and digital literacy of adults in today's society, it is recognised and recorded in this assessment that there are considerations to be made when providing a platform aimed at 3 – 65 year olds.

The existing authentication element of Glow is recognised as not being appropriate for those who are typically 8 and under and therefore the programme must take this into account when options to replace or improve the existing authentication system are available. Further, consideration should be given to the component services of Glow to ensure that they meet the needs of all users.

Protected characteristic: disability

The delivery of Glow needs to consider how it will be made accessible to all. Standards are being adhered to now where possible but further work will be required to ensure these standards are adhered to in all areas of Glow and whether more can be done to make this platform truly available to all.

Protected characteristic: gender reassignment

Glow takes a data feed of user information from other services when creating the accounts for users. Glow needs to ensure that any changes to such information is updated across all services of Glow so that it reflects how the individual is shown online as they wish. This is in place however ongoing monitoring of this capability will be required to ensure it continues to be in place.

Protected characteristic: marriage or civil partnership

This does not apply in regards to the delivery of Glow.

Protected characteristic: pregnancy and maternity

It is considered that with the ability for accounts to be maintained beyond the 9 month grace period that already exists, there is no disadvantage to any individual who is off work for longer than that, whether for maternity leave or any other reason

Protected characteristic: race

We are not aware of any evidence that suggests that this protected characteristic will be affected.

The programme however will continue to ensure that any supporting collateral with photos of users will be representative of the wider population.

Protected characteristic: religion or belief

We are not aware of any evidence that suggests that this protected characteristic will be affected.

Protected characteristic: sex

We are not aware of any evidence that suggests that this protected characteristic will be affected.

The programme however will continue to ensure that any supporting collateral with photos of users will be representative of the wider population.

Protected characteristic: sexual orientation

We are not aware of any evidence that suggests that this protected characteristic will be affected.

Interaction with Other Policies (Draft or Existing)

Not applicable.

Extent/Level of EQIA required

The framing exercise has highlighted the following actions:

- Continuing to adhere to accessibility standards
- Continuing to ensure that Glow services are meeting the needs of all users as far as possible, at each stage of education.

- Widening the authentication options when possible to increase usability for younger learners
- Continuing to monitor how changes to the source information are reflected across all services
- Continuing to ensure that any supporting collateral is representative of the wider population.

Stage 2: Data and evidence gathering, involvement and consultation

Characteristic	Evidence gathered and Strength/quality of evidence	Source	Data gaps identified and action taken
Age	<p>Learners The age profile of learners is:</p> <ul style="list-style-type: none"> • 5 to 7 years old = 22% • 8 to 11 years old = 32% • 12 to 15 years old = 32% • 16 to 19 years old = 12% • Over 19 years old = <0.1% <p>Educators The age profile of the educators is:</p> <ul style="list-style-type: none"> • Under 25 years old = 6% • 25 to 29 years old = 14% • 30 to 34 years old = 14% • 35 to 39 years old = 15% • 40 to 44 years old = 14% • 45 to 49 years old = 12% • 50 to 54 years old = 11% • 55 to 59 years old = 8% • 60 to 64 years old = 4% • Over 65 years old = 1% 	<p>Pupil census 2022</p> <p>Teacher census 2021</p>	<p>This is a breakdown of pupils and educators in state schools in Scotland. It does not break down the current Glow user base nor does it include those in other schools in Scotland that also use Glow.</p>
Disability	<p>Learners The disability profile of learners is 3%</p> <p>Educators The disability profile of educators is currently unknown</p>	<p>Pupil census 2022:</p> <p>Teacher census 2021</p>	<p>This is a breakdown of pupils and educators in state schools in Scotland. It does not break down the current Glow user base nor does it include those in other schools in Scotland that also use Glow.</p>
Gender reassignment	<p>Learners The gender reassignment profile of learners is currently unknown. However, around 200 young people per year receive support from the Scottish Government's Young Person's Gender Service with their transition.</p> <p>Educators The gender reassignment profile of educators is currently unknown. However, membership</p>	<p>Supporting transgender young people in schools: guidance for Scottish schools</p> <p>Teacher census 2021</p>	<p>Data is limited and is not reflective of Glow current users</p>

Characteristic	Evidence gathered and Strength/quality of evidence	Source	Data gaps identified and action taken
	data obtained from the Educational Institute of Scotland in 2021 indicates around 0.05% of educators self-identify as gender reassigned		
Marriage and civil partnership	<p>Learners In respect of this protected characteristic, a body subject to the Public Sector Equality Duty (which includes Scottish Government) only needs to comply with the first need of the duty (to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010) and only in relation to work.</p> <p>Educators In respect of this protected characteristic, a body subject to the Public Sector Equality Duty (which includes Scottish Government) only needs to comply with the first need of the duty (to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010) and only in relation to work</p>		This data is not present however is not considered to be necessary for this exercise.
Pregnancy and maternity	<p>Learners The pregnancy and maternity profile of learners in 2019 was:</p> <ul style="list-style-type: none"> • under 16 years old = 0.03% • between 16 and 18 years old = 0.2% • between 18 and 20 years old = 1.2% • over 20 years old = currently unknown <p>Educators The pregnancy and maternity profile of educators is currently unknown.</p>	Teenage pregnancy by year and age at conception	<p>This is a breakdown of pupils in state schools in Scotland. It does not break down the current Glow user base nor does it include those in other schools in Scotland that also use Glow.</p> <p>Educator data is accepted as missing.</p>
Race	<p>Learners The race profile of learners is:</p> <ul style="list-style-type: none"> • minority ethnic background = 8% 	Pupil census 2022	This is a breakdown of pupils and educators in state schools in Scotland.

Characteristic	Evidence gathered and Strength/quality of evidence	Source	Data gaps identified and action taken
	<ul style="list-style-type: none"> • white = 88% • not disclosed = 1% • not known = 2% <p>Educators The race profile of educators is:</p> <ul style="list-style-type: none"> • Minority ethnic background = 2% • White = 92.5% • Prefer not to say = 3.5% • Unknown = 2% 		It does not break down the current Glow user base nor does it include those in other schools in Scotland that also use Glow.
Religion or belief	<p>Learners The religion or belief profile of learners is currently unknown</p> <p>Educators The religion or belief profile of educators is currently unknown. However, Scottish population data from 2011 indicated the following percentages: 16 to 24 year olds self-identified as –</p> <ul style="list-style-type: none"> • Church of Scotland = 21.5% • Roman Catholic = 15.7% • Other Christian = 4.8% • Buddhist = 0.3% • Hindu = 0.5% • Jewish = 0.2% • Muslim = 1.9% • Sikh = 0.2% • Other religion = 0.3% • No religion = 48.2% • Religion not stated = 6.4% <p>25 to 49 year olds self-identified as –</p> <ul style="list-style-type: none"> • Church of Scotland = 26.5% • Roman Catholic = 18% • Other Christian = 0.1% • Buddhist = 0.4% • Hindu = 0.5% • Jewish = 0.1% • Muslim = 1.9% <ul style="list-style-type: none"> • Sikh = 0.2% • Other religion = 0.4% • No religion = 45.8% • Religion not stated = 6.1% 	Pupil census 2020	This data is incomplete and all that is available is the wider population data therefore any differences between this data and the data for Glow users, whilst not expected to be significant, is unknown.

Characteristic	Evidence gathered and Strength/quality of evidence	Source	Data gaps identified and action taken
	<p>50 to 64 year olds self-identified as –</p> <ul style="list-style-type: none"> • Church of Scotland = 41.8% • Roman Catholic = 15.9% • Other Christian = 6.1% • Buddhist = 0.2% • Hindu = 0.1% • Jewish = 0.1% • Muslim = 0.6% • Sikh = 0.1% • Other religion = 0.4% • No religion = 27.5% • Religion not stated = 7.2% <p>65 years old and over self-identified as –</p> <ul style="list-style-type: none"> • Church of Scotland = 55.8% • Roman Catholic = 14.1% • Other Christian = 7.1% • Buddhist = 0.1% • Hindu = 0.1% • Jewish = 0.2% • Muslim = 0.3% • Sikh = 0.1% • Other religion = 0.1% • No religion = 14.1% • Religion not stated = 8% 		
Sex	<p>Learners The sex profile of learners is: • female = 49% • male = 51%</p> <p>Educators The sex profile of educators is: • Female = 77% • Men = 23%</p>	Pupil census 2022	This is a breakdown of pupils and educators in state schools in Scotland. It does not break down the current Glow user base nor does it include those in other schools in Scotland that also use Glow.
Sexual orientation	<p>Learners The sexual orientation of learners is currently unknown. However, on average around 700 young people per year self-identify as belonging to the lesbian, gay, bisexual, transgender + community.</p> <p>Educators The sexual orientation of educators is currently unknown.</p>	Supporting transgender young people in schools: guidance for Scottish schools	This data is limited in its nature and does not reflect current Glow users.

Stage 3: Assessing the impacts and identifying opportunities to promote equality

Age	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The ongoing delivery of Glow should continue to ensure it does not create unlawful discrimination related to age
Advancing equality of opportunity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is limited evidence that digital skills and confidence can be influenced by age however this is not considered to be sufficient evidence to merit a change in approach for educators. Young learners (early years plus P1 – P3) however may experience issues in using elements of Glow either in terms of authenticating in to the platform or using services. The current approach is for those below P4 not to be given accounts.
Promoting good relations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Disability	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The ongoing delivery of Glow should continue to ensure it does not create unlawful discrimination related to disability
Advancing equality of opportunity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The programme seeks to ensure all components of Glow comply with the WCAG accessibility standards. Areas of concern remain, for both learners and educators, there are expected to be issues in the use of some elements for example for those with visual impairment. There are options, for example, screen readers.
Promoting good relations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Gender Reassignment	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Glow does not store any users gender. There is a recognised potential risk that if users change their name after account creation, they are unable to have the name that they wish used in their account in Glow, this may have negative impacts. We will continue to ensure that our processes support the updating of user accounts should the source for such data be changed, without delay and populated across all services.
Advancing equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Promoting good relations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Marriage and Civil Partnership	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	As this is in regard to employment, this does not apply in this instance.
Advancing equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Promoting good relations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Pregnancy and Maternity	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The ongoing delivery of Glow should continue to ensure it does not create unlawful discrimination related to pregnancy and maternity. Glow accounts are maintained for a period of 9 months and this period can be extended where needed therefore this should not discriminate against any user who is on leave for 12 months or longer.
Advancing equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Promoting good relations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Race	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The ongoing delivery of Glow should continue to ensure it does not create unlawful discrimination related to race In the instances of the programme promoting Glow, we will ensure that collateral is representative of the user population.
Advancing equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Promoting good relations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Religion or Belief	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The continued delivery of Glow should be approached in such a way that it does not create unlawful discrimination related to religion or belief.
Advancing equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Promoting good relations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There are no current known impacts on any Glow users.

Sex	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The ongoing delivery of Glow should continue to ensure it does not create unlawful discrimination related to sex In the instances of the programme promoting Glow, we will ensure that collateral is representative of the user population.
Advancing equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Promoting good relations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Sexual Orientation	Positive	Negative	None	Reasons for decision
Eliminating unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The ongoing delivery of Glow should continue to ensure it does not create unlawful discrimination related to sexual orientation.
Advancing equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Promoting good relations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Across all areas, Glow has in place the ability for users to report any misuse of Glow which would include any activities by users that may be discriminatory for any of the above characteristics.

Stage 4: Decision making and monitoring

Identifying and establishing any required mitigating action

<p>Have positive or negative impacts been identified for any of the equality groups?</p>	<p>Yes</p> <ul style="list-style-type: none"> • Age – potential for difficulties for younger learners to authenticate in to the system and also to use effectively some Glow components • Accessibility – ongoing need to ensure accessibility compliance for all component services. There is a need to consider further what accessibility issues exist and what can be done to ensure these are addressed wherever possible. • Gender reassignment – ongoing need to ensure changes to source data for account creation are reflected in Glow • Race – ongoing need to ensure that any promotional content for Glow is representative of the wider population • Sex – ongoing need to ensure that any promotional content for Glow is representative of the wider population
<p>Is the programme directly or indirectly discriminatory under the Equality Act 2010¹⁷?</p>	<p>No</p>
<p>If the programme is indirectly discriminatory, how is it justified under the relevant legislation?</p>	<p>NA</p>
<p>If not justified, what mitigating action will be undertaken?</p>	<p>NA</p>

Monitoring and Review

This EQIA will be reviewed every 3 years or after any significant change to the Glow platform for Education Scotland.

Stage 5 - Authorisation of EQIA

Please confirm that:

This Equality Impact Assessment has informed the ongoing management of Glow.

Yes

No

Opportunities to promote equality in respect of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation have been considered, i.e.:

- Eliminating unlawful discrimination, harassment, victimisation;
- Removing or minimising any barriers and/or disadvantages;
- Taking steps which assist with promoting equality and meeting people's diverse needs;
- Encouraging participation (e.g., in public life)
- Fostering good relations, tackling prejudice, and promoting understanding.

Yes

No

If the Marriage and Civil Partnership protected characteristic applies to this programme, the Equality Impact Assessment has also assessed against the duty to eliminate unlawful discrimination, harassment, and victimisation in respect of this protected characteristic:

Yes

No

Not applicable

Declaration

I am satisfied with the equality impact assessment that has been undertaken and give my authorisation for the results of this assessment to be published on the Education Scotland website.

Name: Ollie Bray

Position: Strategic Director

Authorisation date: 19th February 2024

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