**Equality Impact Assessment –** Operationalising scaled production and sharing of synthetic data

UK Research and Innovation (UKRI) is committed to promoting equality and participation in all its activities, whether this is related to the work we do with our external stakeholders or whether this is related to our responsibilities as an employer. As a public body, we are also required to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations when making decisions and developing policies. To do this, it is necessary to understand the potential impacts of the range of internal and external activities on different groups of people.

**What is an Equality Impact Assessment and why does UKRI use it?**
When developing a new scheme, or considering changes to an existing one, UKRI will carry out an equality impact assessment to review how it may affect particular groups or individuals and will take the findings into account. We expect that very rarely our actions will create barriers to participation. The assessment may however flag issues that are not of UKRI's making but we will, where it is in our remit to do so, recommend actions and adjustments. Some impacts are not exclusive to the scheme or change that is being evaluated and need to be addressed throughout our organisation. In some cases, we may not have enough expertise and we will consult with others.

**Our leadership and building on good practice**
It is our ambition to be recognised as a leader in Equality, Diversity, and Inclusion and to build on our record of achievements to date, following on from the RCUK, Innovate UK and HEFCE Action Plans. These Plans are updated from time to time and Equality Impact Assessments will help us to prioritise actions.

Current good practice that is relevant to the Operationalising scaled production and sharing of synthetic data funding opportunity includes our EDI in Panel Meetings Guidance for all panel members.

There are multiple dimensions/aspects to this Equality Impact Assessment:
1. Ensuring that the eligibility criteria are clear and objectively justified
2. Ensuring that the submission, Panel review and awarding processes are free from unintentional bias
3. The identification of any potential barriers to attendance and participation in the call and the assessment and awarding process as below
   a. Meeting duration – Appropriate duration to facilitate good environmental conditions for assessment and inclusion
   b. Venue location and arrangements to accommodate needs
   c. Broad ranging panel membership
   d. Meeting management/Chair/robust assessment criteria

| Question | Response |
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| 1. **Name of policy/funding activity/event being assessed** | Evaluating the benefits, costs and utility of synthetic data funding opportunity |
| 2. **Summary of aims and objectives of the policy/funding activity/event** | ESRC is providing a new Funding Opportunity to evaluate the use of low-fidelity synthetic versions of datasets held securely within the UK Data Service (UKDS), the ONS Secure Research Service (SRS), and other trusted research environments (TREs), and then coming up with a set of recommendations based on this for how synthetic data production and provision can be achieved at scale.<br><br>The call is for three complementary pieces of work totalling £375,000 (at full economic cost (fEC)). The call will open in early August and close in October 2023. |
| 3. **What involvement and consultation has been done in relation to this policy?** *(e.g., with relevant groups and stakeholders)* | Extensive consultation with academics, government staff, and data support services through a number of different routes, including through ADR UK's Training and Capacity Building Task & Finish Group which met monthly between November 2021 and March 2022, and a workshop at the International Population Data Linkage Network conference in Edinburgh in September 2022, has identified making synthetic versions of secure datasets widely available as a key dependency for accelerating research using these data and for enabling training on how to use these data.<br><br>This work builds on previous ESRC-funded work by the Behavioural Insights Team, which identified opportunities and barriers for the use of synthetic versions of securely held datasets for research for the public good, and which also generated an easy-to-use- tool for generating low-fidelity synthetic data. |
| 4. **Who is affected by the policy/funding activity/event?** | • Applicants to the Funding Opportunity (Social Science Researchers across the academic life-course are eligible to apply)<br>• Grant Independent Expert Panel (IEP) members reviewing the applications for this Funding Opportunity and making funding recommendations<br>• ESRC decision group members<br>• ESRC staff supporting and attending the IEP and DMP meetings |

| 5. What are the arrangements for monitoring and reviewing the actual impact of the policy/funding activity/event? | Grant recipients are required, on a quarterly basis, to report on their deliverables, milestones, finances, risks, and issues. ESRC will also track specified outputs from the projects.<br><br>Reporting information is to be provided in the form of a highlight report covering:<br><br>• Overall Status including summary of progress and actual or potential issues/risks, and narrative that points to particular issues or areas of concern and any wider contextual information that might be helpful in situating the information. This section would also include vignettes/success stories and commentary<br>• Deliverables - reporting linked to milestones and project outputs identified by successful applicants as part of the application process.<br>A final End of Award report will also be required on completion of the award. |

## GENERAL EQUALITY AND DIVERSITY CONSIDERATIONS

ESRC's research commissioning processes are designed with fairness in mind.

**Eligibility and criteria:**
• The scheme is open to all eligible research organisations (RO)
• Panel members are instructed to assess the application on its merits and not to 'read between the lines' or give the benefit of the doubt based on the reputation of the individual applicant or team, as this would be a form of confirmation bias.

**Standard Grant Terms and Conditions:**

• UKRI standard Grant Terms and Conditions comply with UK equality legislation and include provisions designed to mitigate against potential negative impacts (e.g. sick pay, parental and adoption leave, the possibility of part-time and flexible working, and grant extensions).
• Research Organisations are subject to equality legislation and have a duty to comply with it. RGC 8 states that 'The Research Organisation must assume full responsibility for staff funded from the grant and, in consequence, accept all duties owed to and responsibilities for these staff, including, without limitation, their terms and conditions of employment and their training and supervision, arising from the employer/employee relationship.' Universities are therefore required to make reasonable adjustments as required to support their staff.

**Independent Expert Panel (IEP) recruitment:**

- We will aim to ensure that the composition of the review and decision panel is diverse, with at least a 60:40 gender balance.
- Whilst panel members are appointed, first and foremost, based on expertise, we will aim to appoint a diverse panel membership.  Final decisions take into account trying to balance the panels by gender and geography and seek to ensure a diversity of career stage and institutions.  We will only make recruitment decisions which compromise diversity when it is objectively justified by the necessity to ensure the required breadth of subject expertise with high quality candidates.
- A tool has been developed which allows ESRC staff to assess the EDI characteristics of commissioning panels, and this will be used when appointing panels.


**Process**

- All meetings will be held virtually. We will take account of access needs and review these continuously.
- All panel members will receive guidance which covers issues including fairness, objectivity and unconscious bias.
- An induction session will also be held for all panellists, where full guidance will be provided.
- It is the role of panel members to individually review and score applications, paying close attention to the assessment and scoring criteria and definitions. They will then collectively discuss and agree final scores for each proposal at the panel meeting day.
- For each proposal, two IEP panellists will be appointed to formally assess and score the proposal, with all panel members then asked to participate in discussions in order to ensure that an open and transparent assessment process is undertaken, and a diverse range of views are represented.
- The IEP will then collectively rank and make recommendations to an ESRC Decision Group which will consider the Panel's advice, and make the final funding decision for this call

| Protected Characteristic Group | Is there a potential for positive or negative impact? | Please explain and give examples of any evidence/data used | Action to address negative impact (e.g. adjustment to the policy) |
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| **Disability (both mental and physical)** | Potential negative | Also see above, under General Equality and Diversity Considerations.<br><br>Participants with visual and hearing disabilities may have difficulties if virtual activities cannot cater for their needs.<br><br>Participants with neuro-disabilities may experience difficulties with concentration and focus during virtual activities.<br><br>The current situation may present additional challenges for those intending to apply. We recognise that due to the shift to homeworking that has followed enforced lockdown (which is now lifted), people with disabilities may find the | Also see above, under General Equality and Diversity Considerations.<br><br>Solicit information from online participants (in confidence) about any additional requirements they may have in order to fully participate.<br><br>Online meeting platforms offer an accessible and inclusive environment for participants. Depending on the needs identified, considerations might include:<br><br>• The chat function and closed captioning can be enabled, and volume adjusted, to support those with hearing requirements;<br>• Adequate lighting, alternative document formatting and potential use of screen readers for the visually impaired;<br>• Provision of documents in sans-serif, dyslexia-friendly fonts; and dyslexia-friendly formats; |

| | | current circumstances particularly challenging for a variety of reasons. | • Avoiding colours, lighting etc that may trigger migraines, epilepsy;<br>• Where there are particular constraints consider opportunities for participants to engage in a different way (e.g., tele-conference);<br>• Consider the length of any online meetings, shorten if necessary, and ensure that plenty of breaks are built into the agenda;<br>• Recording of online webinars (e.g., panel induction) so that it can be made available for access at any time. |
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| **Gender reassignment** | Unlikely | Also see above, under General Equality and Diversity Considerations.<br><br>Use of non-gender-neutral language can present a barrier to participation.<br><br>There could be potential discrimination against a panel member, or an applicant due to their perceived or actual experience of gender reassignment. | Also see above, under General Equality and Diversity Considerations.<br><br>UKRI terms and conditions are flexible in nature and absence as a result of medical treatment. We would expect that absence related to transition would be covered by the Research Organisation's medical policy and strongly encourage ROs to treat absence relating to transition like any other medical absence.<br><br>Consideration needs to be given at UKRI level as to how records (including Gateway to Research and |

| | | Trans people may be absent from work as a consequence of transition and UKRI records may show the wrong gender. | other communications materials) might be adjusted. |
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| **Marriage or civil partnership** | Probably not. | Applicant eligibility is not based on marital status. | N/A |
| **Pregnancy and maternity** | Potential negative | Also see above, under General Equality and Diversity Considerations. Childcare responsibilities may be a barrier to attending events and meetings. Completion of the work may be affected by maternity and parental leave and leave related to surrogacy and adoption. | Also see above, under General Equality and Diversity Considerations. The costs of additional childcare for grant-holders, beyond that required to meet the normal contracted requirements of the job, and that are directly related to the project, may be requested as a directly incurred cost if the institutional policy is to reimburse them. However, childcare costs associated with normal working patterns may not be sought. Dates will be agreed and publicised in advance to allow potential attendees to make arrangements to attend, and events will be held during core working hours and avoiding school holidays, half term, or other key dates which may |

| | | | compromise participants' ability to commit.<br><br>Ensure there are sufficient breaks in any online meeting to provide breaks for breastfeeding/expressing persons if necessary.<br><br>Ensure the use of gender-neutral language – parental leave, irrespective of sexual orientation. |
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| **Race (including ethnicity)** | Potential negative | See above, under General Equality and Diversity Considerations. | See above, under General Equality and Diversity Considerations (particularly in relation to panel composition and mitigations against unconscious bias) |
| **Religion or belief** | Potential negative | See above, under General Equality and Diversity Considerations.<br><br>There could be potential discrimination because it is known that somebody (either a panel member, a research applicant or research participants) has a particular faith or belief. | Also see above, under General Equality and Diversity Considerations (particularly in relation to panel composition and mitigations against unconscious bias)<br><br>Ensure that religious observances are taken into account when planning panel meetings. Considerations might include:<br><br>• Scheduling meetings to avoid major religious festivals; (if impossible to avoid then consider mitigations); |

| | | | • Allowing prayer breaks if requested |
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| **Sexual orientation** | Potential negative | Also see above, under General Equality and Diversity Considerations. | Also see above, under General Equality and Diversity Considerations. |
| **Sex (gender)** | Potential negative | Also see above, under General Equality and Diversity Considerations. | Also see above, under General Equality and Diversity Considerations.<br><br>Ensure use of gender-neutral language in call specification, guidance, etc.<br><br>Ensure that the panel has balanced gender representation (aim for no higher than 60:40 split) |
| **Age** | Potential negative | Also see above, under General Equality and Diversity Considerations. | Also see above, under General Equality and Diversity Considerations.<br><br>Use of a variety of different communication strategies including social media to ensure that our messages reach the widest possible target audience. |
| **Other characteristics not** | Potential negative. | | ESRC is committed to go above and beyond bare compliance with Equalities legislation to ensure that |

| protected under the Equality Act | | | our processes are as fair and equitable as they can be.<br><br>When developing strategies, we will ensure that we look beyond the protected characteristics to ensure general inclusivity.<br><br>We work to ensure that panels are balanced as far as possible (within the constraints of quality and appropriateness) across the range of protected characteristics, where we have the data, and across broader characteristics including participation from post-1992 and Russell Group institutions, ensuring that we have a good geographical spread of panel members across the four nations of the UK, and across a diversity of career stages and paths. |
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**Evaluation:**

| Question | Explanation / justification |
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| Is it possible the proposed change in policy, funding activity or event could discriminate or unfairly disadvantage people? | See the potential negative impacts outlined above.<br><br>The opportunity is widely publicised by UKRI/ADR UK through a variety of communication channels.  Documents which explain the application process, applicant eligibility and support provided throughout the process by ADR UK and its partners are published to support the opportunity.  ADR UK also hosts an applicant webinar and attendees are encouraged to submit questions/concerns before, during and after the event. |

| Final Decision: | Tick the relevant box | Include any explanation / justification required |
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| 1. No barriers identified; therefore activity will **proceed**. | | |
| 2. You can decide to **stop** the policy or practice at some point because the data shows bias towards one or more groups | | |
| 3. You can **adapt or change** the policy in a way which you think will eliminate the bias | | |
| 4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore you are going to **proceed with caution** with this policy or practice knowing that it may favour some people less than others, providing justification for this decision. | ✔ | See the mitigations outlined above |

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| **Will this EIA be published\* Yes/Not required** (\*EIA's should be published alongside relevant funding activities e.g. calls and events: | Yes |
| **Date completed:** | **July 2023** |
| **Review date** (if applicable): | **Not applicable** |

**Change log**

| Name | Date | Version | Change |
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