



Equality Impact Assessment Template

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement and Guidance and Checklist Notes, and undertake our online training on Equality and Diversity and EqIA. These, along with further information and resources, are available at www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment

EqIA covers policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services, but will be referred to as 'policy/practice' hereinafter.

A. Policy/Practice (name or brief description): Introduction of a platform, Edinburgh Language Model (ELM), to provide responses to user queries using generative artificial intelligence (GAI). ELM aims to ease technical challenges and provide information on various topics related to academics, campus resources, and support services.

The platform will be accessible through a web interface, compatible with both desktop computers and mobile devices. It will utilize natural language processing algorithms and machine learning models to understand user queries and provide relevant and accurate responses.

The development of ELM will be led by EDINA with oversight provided by the AI Short Life Working Group and the Artificial Intelligence and Data Ethics board within the University.

The introduction of ELM aligns with the University's commitment to equality, diversity, and inclusion by providing equal free at the point of use access to information and support services. It aims to foster good relations by ensuring that all users, have access to the same level of GAI assistance and resources.

Overall, ELM has the potential to improve communications and access to information and resources for some users, including those in equality groups within the University community. It should be noted that all technology of this type may contain inherent biases and possibly indirect discriminatory output simply because of the data corpus upon which it was trained. We cannot mitigate against this at present other than to forewarn users that "ELM can make mistakes. Consider checking any important information."

B. Reason for Equality Impact Assessment (Mark **yes against the applicable reason):**

- Proposed new policy/practice **yes**
- Proposed change to an existing policy/practice
- Undertaking a review of an existing policy/practice

- Other (please state):

C. Person responsible for the policy area or practice:

Name: Anne Robertson

Job title: Interim Director

School/service/unit: EDINA, Information Services Group

D. An Impact Assessment should be carried out if any of the following apply to the policy/practice, if it:

- affects primary or high level functions of the University **YES**
- is relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' as set out in the Policy and Guidance)? **YES**
- It is one which interested parties could reasonably expect the University to have carried out an EqIA? **YES**

E. Equality Groups

To which equality groups is the policy/practice relevant and why? (add notes against the following applicable equality group/s)

- Age
- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership¹

Add notes against the following applicable statements:

ELM will be available to all staff and students at the university with an accredited EASE login. Therefore, ELM has the potential to impact all 9 protected characteristics. ELM implements OpenAIs Moderation API which flags unacceptable content which may infringe the University's use of OpenAIs services. Flagged Moderation is logged and reported at a summary level weekly but not proactively monitored 'real time'. Flagging a moderation will terminate the current chat in ELM. Note that all technology of this type may contain inherent biases and possibly indirect discriminatory output simply because of the data corpus upon which it was trained. We ensure users are aware of this by stating "Please be aware that due to the nature

¹ Note: only the duty to eliminate discrimination applies to marriage and civil partnership. There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect.

of this technology, responses may include inaccurate, fictitious or completely wrong information.”

We include the following warning:

“All technology of this type may contain inherent biases and possibly create discriminatory output simply because of the data corpus upon which it was trained. We cannot prevent this at present but aim to mitigate and warn users by stating “Please be aware that due to the nature of this technology, responses may include inaccurate, fictitious or completely wrong information.”

However, the protected characteristic of disability may experience the greatest impact, as this relates to accessing the ELM service through the use of IT equipment (either desktop or mobile and via the internet). The ELM application and accompanying information will be embedded on the ELM webpages. The ELM website contains an Accessibility Statement, as per The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 based on manual testing of the application against the Web Content Accessibility Guidelines 2.2 AA standards. Reasonable adjustments will be in place should a disabled user prove unable to use the platform, and that we were unable to rectify. We will continue to consult with relevant groups and monitor all feedback positive and negative for anything related to the 9 protected characteristics and act accordingly

ELM may have the potential to have a positive effect on disability, whereby it will provide another method for users to get responses to frequently asked questions about accessibility and support services for disabled students and parents. This will likely apply to other protected characteristics as well . ELM will be accessible on standard browsers (including Edge, Chrome, Firefox, and Safari) on desktop and mobile device, be available 24/7, accessible from anywhere to all staff and students with a valid EASE login. ELM has not been specifically trained on University specific content ELM is a general purpose chatbot capable of advanced language comprehension and processing capabilities including (but not limited to): Content Creation; Translation; Writing code; Debugging; Code completion; Code documentation; Text summarisation.

Another significant consideration is race, whereby information will primarily be provided in English, which is mitigated by the fact that the main teaching language of the University is also English. There is a potential positive effect in that by providing the service online, users can access the information and subsequently use browser translation tools to convert it into a preferred language.

Future phases of development will be informed by further and ongoing consultation with a wide range of stakeholders across the university. On initial release the full

range of potential use cases and applications of ELM are unknown due to the generic utility of the technology to a vast range of research, teaching and administrative uses. The ELM Service Owner will continually review emergent use cases. This will ensure that we are identifying and enhancing relevant and important information for all equality groups.

The University vision involves a continuing commitment to equality, diversity, and inclusion for both students and staff. The University has a single [Equality Strategy](#) to ensure that equality, diversity, and inclusion are guiding principles in our pursuit of academic excellence.

- On any available information about the needs of relevant equality groups: A manual accessibility audit has been carried out comparing ELM with the Web Content Accessibility Guidelines 2.2 AA standard, and areas have been identified where improvements to accessibility can be made and these have been actively addressed. We will continually review our accessibility performance in light of evolving technology upgrades and user feedback. An accessibility statement in line with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 is published on the system pages.

Additionally, ELM has been presented to the AI and Data Ethics Board (AIDE) as well as the University's AI Short Life Working Group, Legal colleagues at EI and the Director of Student Wellbeing and the ISG Ethics Board. Should disabled users prove unable to access ELM, and we were also unable to rectify this issue, reasonable adjustments would be put in place. This could include assistance in utilising ELM by the service, which would be free of charge to the user and given upon request.

- Any gaps in evidence/insufficient information to properly assess the policy, and how this will be addressed:

At this stage, we feel we have sufficient information to proceed.

- If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups

We do not believe the ELM will not lead to any form of prohibited conduct for the reasons detailed above and below. If a disabled user was unable to access ELM and we were unable to rectify this then we would ensure that reasonable adjustments were put in place such as staff assistance in accessing the tool.

ELM provides an Acceptable Use Policy and a Terms of Use document. It is mandatory to accept these Terms of Use (which cites the Computer Regulations and the University's guidance on the use of generative AI) prior to

use. The ELM interface clearly provides pointers to the University's staff and student specific guidance as well as a statement that clearly states "Please be aware that due to the nature of this technology, responses may include inaccurate, fictitious or completely wrong information.

Reminder: You are not talking to a human - If you are seeking or need welfare assistance please see Student Wellbeing [\[link\]](#).

".ELM also implements OpenAIs Moderation API which flags unacceptable content which may infringe the University's use of OpenAIs services. Flagged Moderation is logged but not proactively monitored. Flagging a moderation will terminate the current chat in ELM.

- If the policy/practice contributes to advancing equality of opportunity ELM will improve access to information and resources for all users. It will provide 24/7 access to GAI services, ensuring that no students/staff are disadvantaged due to having to pay for access to the service (as would be the case without ELM). There are minor caveats that users need to have a valid EASE account, internet access and a reasonably up to date device (browser/tablet/mobile)..This should help to ensure that those who may experience high living costs such as some disabled users etc get to access the same tools that others with more disposable income may be able to utilize..

- If there is an opportunity in applying this policy/practice to foster good relations:

It is hoped that by considering impacts, positive and negative, on all the protected characteristics via this Equality Impact Assessment, we are showing that the University is committed to equality, diversity, and inclusion. We have considered (and will continue to consider) ways to mitigate and provide support and information to users in these groups. ELM provides a prominent user Feedback form to gather anonymous means for users to feedback their experiences. We will actively monitor such Feedback to inform and prioritise future improvements (functional and non-functional) to ELM. As noted earlier ELM uses a Moderation API to prevent flagged queries being promulgated. Our Acceptable Use policy clearly states that "Use of ELM is monitored and entering certain content into the query field will be flagged.."

- If the policy/practice create any barriers for any other groups?

To use ELM, users will need access to an internet-enabled device (e.g., desktop computer, mobile, or tablet). Therefore, this has the potential to impact users with socioeconomic considerations and lower incomes, since this is predicated on accessing the internet via IT equipment (desktop, laptop, tablet and / or mobile device). However, all staff and students have free, 24 / 7 IT facilities at the University, principally at the George Square Main Library. IT facilities are also provided at other campuses across Edinburgh. Public libraries in the UK also facilitate free access to the internet. Finally, other countries have similar options available.

- How the communication of the policy/practice is made accessible to all groups, if relevant?

Communication about ELM, including instructions and user guides (default in HTML), can be provided in a variety of formats. The web pages provided on the website through the ELM interface have been tested against the Web Content Accessibility Guidelines 2.2 AA standards and the accessibility statement for ELM covers these information HTML pages as well. Alternative formats will be available free of charge on request. Communications and Marketing (both EDINA and ISG) will be asked to communicate about the launch of the new ELM to students, staff using a variety of communication channels which may include face to face workshops to be held in accessible premises. Any feedback captured at these events will inform future improvements and enhancements to ELM where practicable and feasible. We can also use aggregated Moderation statistics to review and adjust the service if needed.

- How equality groups or communities are involved in the development, review, and/or monitoring of the policy or practice?

ELM explicitly provides a user feedback form information from which will be used to inform future phases of development. Development of ELM to date has been under the aegis of the AI & Data Ethics Board and the AI Short Life Working Group, Legal and Director of Student Wellbeing and the ISG Ethics Board. We will continue to consult with relevant groups and monitor all feedback positive and negative for anything related to the 9 protected characteristics and act accordingly.

- Any potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality, and promote good relations:

Nothing other than mentioned above.

F. Equality Impact Assessment Outcome

Select one of the four options below to indicate how the development/review of the policy/practice will be progressed and state the rationale for the decision

Option 1: No change required – the assessment is that the policy/practice is/will be robust.

For the reasons stated above and below.

~~**Option 2:** Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.~~

~~**Option 3:** Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified~~

~~**Option 4:** Stop the policy or practice as there are adverse effects cannot be prevented/mitigated/or justified.~~

G. Action and Monitoring

1. Specify the actions required for implementing findings of this EqIA and how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).

The ELM Service Owner will be responsible for ensuring the EQIA and all other relevant policy documents are regularly reviewed and updated accordingly.

We will monitor all feedback for any comments, positive or negative, related to any of the nine protected characteristics and act accordingly. Staff operating the service will also be made aware of the need to make reasonable adjustments for some users where appropriate, including providing information in alternative formats, free of charge, upon request.

As noted earlier, ELM implements a Moderation process that ensures compliance to OpenAI's Usage Policy. The issues these moderation violations flag may be viewed as negative uses of the AI. We actively terminate conversations that are in violation of these prechecks. Responses from the service rely on the implementation of similar protocols at OpenAI's end and we cannot guarantee that responses may not be biased or discriminatory in content. To mitigate this, we do clearly state beside all responses that "ELM can make mistakes. Consider checking any important information."

2. When will the policy/practice next be reviewed?

Ongoing - given that ELM is a new service we will continually review feedback received including any feedback that relates to protected characteristics. The Policy will be formally reviewed at least once every 12 months at which point the EqIA will be updated

A review of ELM will take place upon receipt of any feedback, positive or negative, related to any of the nine protected characteristics. On each of these occasions, the EqIA will be updated as required.

H. Publication of EqIA

Can this EqIA be published in full, now? Yes/No

If No – please specify when it may be published or indicate restrictions that apply:

I. Sign-off

EqIA undertaken by (name(s) and job title(s)): James Reid, Head of Services, EDINA, Information Services Group

Accepted by (name): Anne Robertson, Interim Director, EDINA, Information Services Group

[This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]

Date: 26.04.2024

Retain a copy of this form for your own records and send a copy to equalitydiversity@ed.ac.uk