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):

A new way of accessing the EdHelp service, the EdHelp Chatbot (branded as AskEdHelp) uses generative AI to provide answers to queries on Student Administration, Finance, IT and Library topics to students. The EdHelp Chatbot is trained on information in the EdHelp Knowledge base, which is created and maintained by the EdHelp team. As it is written by people there is always the possibility of bias, but as it is based on very specific information provided by the relevant departments of the university, we believe the risk of bias is low.

The EdHelp Chatbot will provide a 24-hour online service, providing information in a friendly and easily accessible format. It is being launched in a pilot version in the first instance, with a view to expansion based on usage statistics and feedback.

B. Reason for Equality Impact Asessment (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: **Gosia Such**

Job title: **Director of User Services Directorate (USD), USD Directors Office**

School/service/unit: **USD, Information Services Group**

D. An Impact Assessment should be carried out if any if 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

The EdHelp Chatbot is an extension of the EdHelp service, providing online information in an easy-to-use manner. It will provide another route to access EdHelp online information, in addition to the current methods (online self-service portal, web enquiry form, online live chat, and in person service desks.

It will cover the areas EdHelp provides frontline support for: Student Administration, Library, IT and Student Finance, as well as other related areas of knowledge that have been built up by EdHelp. It will be available 24/7 to students and staff using their EASE login.

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 partnership[1]

The new service does have the potential to impact on all 9 protected characteristics as the Chatbot will be available around the world and to all staff and students using the UniDesk portal. It has the potential to affect both the staff and the students using it.

All content is added to the Chatbot database by EdHelp staff and must not discriminate against any of the protected characteristics. Any content that is found to discriminate against any of the protected characteristics would be corrected. The University vision is a continuing commitment to equality and diversity for both students and staff. The University has a single equality strategy to ensure that equality and diversity are guiding principles in our pursuit of academic excellence.

The Chatbot database consists of the EdHelp Knowledge Base, which is created and maintained by EdHelp staff through a review process. The dataset to only Knowledge Items which are written by EdHelp staff and reviewed regularly. The Chatbot will not have access to general knowledge and will not respond to queries outside of its scope. The limited scope prevents the Chatbot from making up information or hallucinating, reducing the risk of biased data. The welcome message to students and branding are clear that this is an AI-based automated chatbot, and a disclaimer at the bottom advises users how to check information that they are unsure about.

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[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.

The branding and communication materials have been considered from an accessibility point of view but also from the angle of trying to make them as inclusive as possible. This increased offering of services online may make the service more accessible for some disabled users, those with caring/childcare responsibilities and those who observe times of religious observance as it allows greater freedom in terms of time, as the service is available 24/7 and can be accessed remotely without travelling to a specific location.

The prompts governing the Chatbot's behaviour have been designed to allow it to answer in clear and plain English. The Chatbot is capable of translating answers into other major languages. There is a potential impact on Race as the answers and moderation tool are likely to be less accurate in languages other than English. We have reduced this risk by not advertising the ability to use languages other than English. As English but as this is the main teaching language of the University we do not believe this should create any disadvantage. There may be an impact on students who attempt to access the Chatbot from countries where internet access is restricted.

Students will gain access to the service via their EASE credentials, which means when they log an enquiry, their name and email will be pulled through from their University credentials. EdHelp staff have access to EUCLID and this has been approved within a Data Protection Impact Assessment. EdHelp staff are trained to ensure they maintain confidentiality and specific areas of EUCLID such as a disabled student's learning profile are not visible. EUCLID does include information on a student's age and gender and information on their marital status may be available via their emergency contacts.

Queries submitted to the EdHelp Chatbot will be logged in Unidesk and reviewed by the EdHelp team for acceptable use and accuracy of answers. Knowledge Base content will be updated where appropriate.

A moderation process is in place to flag messages with words related to threats of harm, violence, hate speech, self-harm and suicide. A process is in place to provide an immediate automated response with sources of support, a well as a message to EdHelp Management who will make referrals to appropriate services. Staff will have to use this information in an appropriate manner and any discriminate actions taken on the basis of this information would meet with disciplinary action. Staff have attended training on unconscious bias so they are aware of any potential unconscious bias. Staff are required to attend training which covers a wide range of issues including: disability awareness training, dealing with distressed students, responding to disclosures of sexual violence, unconscious bias etc. Staff have access to and are familiar with the University guidance on dealing with distressed students.

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups:

We have consulted with the Information Services Disability Information Team and the Student Disability and Learning Support Service, the Student Counselling Service and Student Wellbeing Service, and the Edinburgh University Student's Association. The system has been tested for compliance with the Web content Accessibility Guidelines 2.2 AA standard and an

accessibility statement published in line with The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018

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

At this stage, we feel there is sufficient evidence 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 this change will lead to any form of prohibited conduct for the reasons detailed above and below. If a user was unable to use the chatbot and we were unable to resolve this, the information is available by other means such as email, phone, website, enquiry form and in person. The system will automatically flag unacceptable and concerning content. EdHelp managers will be notified of any flagged messages and address with reference to Student Wellbeing or Student Conduct as necessary.

- If the policy/practice contributes to advancing equality of opportunity[2]

The ability to access clear information online and increased self-service options mean it is not a necessity to have to travel to a physical location to access some services. This means that it may be more accessible to those with caring/parental responsibilities and individuals with certain disabilities as well as to those who observe times of religious observance by enabling them to access assistance at a closer location or remotely, but also being able to access information via the self-service provision at whatever time they wish. The ease of access by asking a question rather than having to search a list of topics may make it more accessible to some disabled users.

Students who have tested the Chatbot found it much easier and quicker to find and process information provided by the Chatbot compared to the same information available through browsing or using the search engine in the Self-Service Portal.

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

We hope that by demonstrating our commitment to considering equality issues and taking account of the needs of various protected characteristics we have demonstrated our desire not only to meet our needs under the legislation but to promote good practice and therefore prompt and foster good relations. We have engaged with students in the process to date and will continue to do so and monitor all feedback for any comments positive or negative related to any of the nine protected characteristics. Where appropriate we will seek input from the Student Disability and Learning Support Service, the Student Wellbeing Service, the Chaplaincy, The International Office and the Edinburgh University Student's Association and

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[2] This question does not apply to the protected characteristic of marriage or civil partnership

any other relevant bodies or groups. We hope this demonstrates that we take our duty to be as inclusive as possible very seriously.

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

There should not be any barriers to any other groups e.g. such as those on low incomes as there is no cost to access this service. Students will need access to an internet-enabled device (e.g., desktop computer, mobile, or tablet). IT facilities are provided at the University's libraries and campuses, ensuring access to internet-enabled devices for all users. These facilities are available 24/7. Students in financial hardship have access to long-term use of laptops and internet through the University's Long-Term Laptops and Mifi programme. Libraries in UK offer free IT access as well and other countries have similar arrangements. Students and staff have free 24 hours access to IT facilities so there should be no disadvantage for those on low incomes.

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

Any information about the service is available in alternative formats upon request free of charge. Information about the service is available on the Website which is part of EdWeb (the Universities website) and this is based on the Web Accessibility Compliance Guidelines 2.2 AA standard in line with the Universities Web Accessibility Policy. As per the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 an accessibility statement has been added to the website and the EdHelp Chatbot interface.

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

Feedback from users is gathered on a continuous basis and analysed to note any potential positive or negative impacts on the 9 protected characteristics that need to be addressed. Any mechanism used to gain feedback from users is available in alternative formats. The service is evaluated and feedback gathered from all users, including questions on how accessible the service is and is continually assessed in terms of accessibility when any developments are made. Where appropriate we will seek input from the Student Disability and Learning Support Service, the Chaplaincy, the International Office and the Edinburgh University Student's Association and any other relevant bodies or groups.

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

For the reasons detailed above and below. We realise that AI has the potential for bias but with the safeguards we have put in place and the data the system is based on we believe the risk to be low. We will continue to monitor and review this.

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).

   - **Review all feedback for any comments positive or negative related to any of the 9 protected characteristics**
   - **Ensure staff are appropriately trained to sensitively respond to queries flagged for moderation.**
   - **Ensure staff are reminded of the need to make reasonable adjustments and provide documents in alternative formats on request.**

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

The policy will be reviewed and updated as and when any changes to the service are made, or when we receive any feedback (positive or negative) related to any of the 9 protected characteristics.

H. Publication of EqIA

Can this EqIA be published in full, now? **YES**

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)): **Brenda Welch, EdHelp Service Delivery Manager, User Services Division, Information Services Group**

Accepted by (name): **Gosia Such, Director of User Services Directorate (USD), USD Directors Office, Information Services Group**
[This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]

Date: 30th April 2024

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