Derby City Council

Equality impact assessment form

Directorate	Chief Executive's Directorate
Service area	Digital & Physical Infrastructure & Customer Engagement
Proposal	**Transforming the Council using AI Technology** • **The overarching Artificial Intelligence Technology** • **People Services – Adults:** AI and Occupational Therapy led reviews of community care packages **-£2.904m** • **People Services – Adults:** Use of AI to reduce the need for residential placement - keeping clients in the community **-£0.125m** • **People Services – Adults:** Use of AI to allow Citizens & Professionals to obtain FAQ responses, signposting to services, self-assessment and create enquiries & notifications **-£0.050m** • **People Services – Adults:** Use of AI - outbound proactive chasing of financial debt. The solution is anticipated to generate improved recovery of the existing debt **-£0.210m** • **People Services – Children:** Use of AI - reduction in 3rd party translation costs through the ability to translate documents within the AI solution **-£0.025m** • **Chief Executive's:** Use of AI - outbound proactive chasing of Council tax debt. The solution is anticipated to generate improved recovery of the existing debt **-£0.336m** • **Council-Wide:** AI Management of Customer Service enquiries, filtering and signposting responses, increased Citizen self-service through new skills to handle most common complex tasks **-£0.275m**
Reason for proposal	The Benefits Management Approach for the AI discovery focused on identifying and quantifying cost and time savings opportunities for the Council. The qualification process focussed on identifying the AI opportunities that provided a cost saving against the savings criteria: **Time Saving:** Process efficiencies that reduce employee time required to complete activities and contributing towards potential future FTE savings **Cost Reduction:** Improvements that are anticipated to result in reduction to cost of delivery of services

	Cost Avoidance: Solutions that would facilitate a reduction in future planned spend
	Revenue Collection: Efficiencies in the collection of owed monies
	Revenue Generation: Solutions that facilitate the generation of new monies to the Council
	In addition to the significant cost saving opportunities, there are also a number of other benefits that will be derived from the delivery of the programme:
	Automated Processes: AI can automate routine and repetitive tasks, allowing employees to focus on more complex and strategic activities, and undertaking more regular review and analysis than human capacity allows for
	Enhanced Decision-Making: AI can analyse large datasets quickly and provide valuable insights - this can empower decision-makers with accurate and timely information, leading to more informed and effective decision-making
	Streamlined Operations: AI can optimise workflows and streamline operations by identifying bottlenecks and inefficiencies
	Risk Mitigation: AI can predict potential issues or risks, allowing the Council to take proactive measures to mitigate them - this can enhance resilience and reduce the likelihood of unexpected disruptions
	Skill Enhancement: Implementing AI often requires upskilling the workforce. This can lead to increased job satisfaction as employees acquire new skills and adapt to evolving technologies
	Innovation and Adaptability: Introducing AI should encourage a culture of innovation within the Council - employees are more likely to explore creative solutions and embrace change, fostering adaptability
Sign off (Director/Head of Service)	Lee Haynes – Head of Digital Enablement & Automation
Date of assessment	22/01/2024

Please read the support notes to help you in <u>Appendix 1 on page 4</u> before completing your assessment

The form

You need to attach the completed form to any report to help councillors and colleagues make their decisions by taking equality implications into account.

The assessment team or name of individual completing this form

Team leader's name and job title – Lee Haynes – Head of Digital Enablement & Automation

Other team members if appropriate

Name	Job title	Organisation	Area of expertise
Jane Witherow	Head of Customer Engagement and Registration Services	Derby City Council	Customer Contact

Name	Job title	Organisation	Area of expertise
Emily Freeman	Head of Safeguarding & Professional Standards	Derby City Council	Adult Social Care
Keiley Freeman	Head of Projects & Change	Derby City Council	Project / Change Management
Lauren Stephenson-Mabb	Digital Development Manager	Derby City Council	Digital Services

Step 1- setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side- tracked.

1. What are the main aims, objectives and purpose of the decision you want to make?	Derby City Council and Derby Homes partnered with a leading AI company in January 2023 and in April 2023, Derby City Council launched Darcie and Derby Homes launched Ali as web Digital Helpers. In May 2023, Derby City Council and Derby Homes launched Darcie and Ali on the contact centre telephony solution, becoming the first council in the UK to replace its main switchboard with a phone-based AI assistant proficient in council services. Following on from the implementation of Darcie and Ali, the Council commissioned the AI Partner to conduct a number of discovery workshops, tasked with compiling further specific business cases where the application of AI technology could enhance efficiency, reduce operational costs, and support the Council's objective of delivering cumulative cost savings. The business cases, supported by huge and continuing advancements in AI have identified a minimum savings total combined of £12.25m, and will contribute towards the Council's Medium Term Financial Plan. There were 261 AI opportunities identified at the discovery workshops of which 54 have AI solutions proposed to deliver the minimum savings total combined. The plan to deliver the AI transformation programme is 18 months, split into three phases. **Phase 1** involves the introduction of AI co-pilots and language models in key areas such as Adult Social Care and Children's Services. This phase is centred around enhancing communication and automating routine tasks, allowing staff to focus on more complex and critical aspects of their roles. **Phases 2 and 3** expand the scope of AI integration, targeting areas like Debt Management and Revenue & Benefits checks. This phase aims to refine existing AI systems, incorporate more sophisticated algorithms, and extend AI capabilities to more complex decision-making processes. Phase 3 has not yet been fully scoped as it is anticipated that AI technology will have developed even further by the time this phase of the programme is ready for implementation. **Phase 1 (4 Months)** o Adult Social Care External Co-pilot o Wider Staff Co-pilot o Customer Service Co-pilot o Debt Management

Phase 2 (8 Months)

o   Childrens Services External Co-pilot

o   Adult Social Care Internal Co-pilot

o   Customer Service Additional Skills

o   Derby Homes Co-pilot

Phase 3 (6 Months)

o   Childrens Services Internal Co-pilot

o   Revenue & Benefits Skill

o   Information Governance and IT

The minimum savings total combined of £12.25m is made up from the following areas of the business:

Adult Social Care -£8.9m

o   Care Reviews -£6m

o   Managing Demand -£0.100m

o   Placement Management -£0.050m

o   Independent Services (Reablement/TEC/DLA) -£1m

o   Enquiry Management - self-service enquiry management, signposting and deflection -£0.050m

o   Financial Assessments -£0.100m

o   Increase in Continuing Health Care -£0.075m

o   Maximisation of benefit entitlement -£0.025m

o   Reduction in Self Funders -£0.050m

Children's Services -£0.950m

o   Reduction in Child Allowances over payments, checking addresses and automation -£0.430m

o   Reduction in Care Placements through improved brokerage, increase in fostering placements -£0.250m

o   Increase in Supporting Families payments -£0.100m

o   Increase in Continuing Health Care -£0.070m

o   Reduction in spend on 17 year olds as part of the transition process by applying ASC eligibility earlier and moving to a package that person would have at 18 -£0.050m

o   Maximisation of benefit entitlement -£0.025m

o   Reduction in IFA expenditure through increased fostering placements -£0.025m

o   Cost avoidance by managing increase demand through using AI to manage demand at the front end

Customer Channels & Wider Council Internal Automation including Debt Management -£2.4m

o   Enquiry Deflection - increased self-service simple enquiry management, signposting and deflection -£0.300m

	o Skill Deflection - complex request management through skills providing self-service notification and request management and follow up -£0.600m
	o Inbox Management - AI management of inbound e-mails, filtering and triggering deflections and signposting -£0.100m
	o IT Self Service and through AI Ticket Management -£0.150m
	o Application of AI for Information Governance redaction -£0.100m
	o Implementation of dynamic multi-lingual interpretation and translation over all front doors -£0.100m
	o Reduction of benefit overpayments from notification of Change of Circumstances -£0.100m
	o Generation of daily press summaries on outbound content generation -£0.050m
	o Debt Consolidation
	o Debt Chasing (Finance) -£0.420m
	o Debt Chasing (Council Tax) -£0.480m
	This is the minimum savings total combined saving. However, to reflect the partial year effect during the implementation period and the urgency surrounding the earliest possible contribution to the Medium Term Financial Plan, savings of £3.925m are included in the Medium Term Financial Plan proposal for 2024/25 across these 7 areas:
	People Services – Adults: AI and Occupational Therapy led reviews of community care packages **-£2.904m**
	People Services – Adults: Use of AI to reduce the need for residential placement - keeping clients in the community **-£0.125m**
	People Services – Adults: Use of AI to allow Citizens & Professionals to obtain FAQ responses, signposting to services, self-assessment and create enquiries & notifications **-£0.050m**
	People Services – Adults: Use of AI - outbound proactive chasing of financial debt. The solution is anticipated to generate improved recovery of the existing debt **-£0.210m**
	People Services – Children: Use of AI - reduction in 3rd party translation costs through the ability to translate documents within the AI solution **-£0.025m**
	Chief Executive's: Use of AI - outbound proactive chasing of Council tax debt. The solution is anticipated to generate improved recovery of the existing debt **-£0.336m**
	Council-Wide: AI Management of Customer Service enquiries, filtering and signposting responses, increased Citizen self-service through new skills to handle most common complex tasks **-£0.275m**
	The main objectives of the AI transformation programme across the 7 areas are as follows:

(i) Adult Social Care Internal Co-pilot: Implement AI solutions to support self-service inquiry management and improve assessments and checks in Adult Social Care.

(ii) Organisational Language Models: Develop language models tailored to specific Council departments (e.g., Adult Social Care, Children's Services) to facilitate more effective communication and service delivery.

(iii) Care Assessments and Plans: Automate the creation of care plans and brokerage requests following assessments, incorporating technologies like reablement and community services.

(iv) Scheduled Reviews: Implement AI for scheduled care reviews, focusing on opportunities for reablement, community services, and standardisation of care.

(v) Financial Assessments: Assist staff in conducting financial assessments for care contributions, including income, savings, assets, and benefits analysis.

(vi) Continuing Health Care Assessments: Automate health care assessments to determine financial contributions and medical needs eligibility.

(vii) Circumstance Checks: Use AI to conduct checks for clients receiving pre-pay card payments and self-contributors.

(viii) Customer Service Enhancements: Improve the Customer Service Co-pilot with additional skills for handling various citizen inquiries, like street cleaning notifications and information requests.

(ix) Debt Management Integration: Expand data sources for debt management and automate data uploads to the finance system.

(x) Revenue & Benefits Checks: Implement a system to perform proactive checks on benefit and council tax reduction recipients to minimize overpayments.

(xi) Multi-lingual Interpretation and Translation and Booking Features: Enhance AI systems to recognise and in multiple languages and facilitate appointment bookings.

(xii) Integration with Existing Systems: Ensure seamless integration of AI solutions with current systems.

(xiii) The programme demonstrates a commitment to leveraging AI for enhancing service delivery, operational efficiency, and decision-making across various departments of the Council. The outlined objectives focus on improving internal processes, citizen engagement, financial management, and overall service effectiveness.

2. Why do you need to make this decision?	• The AI transformation programme will generate a minimum savings total combined of £12.25M annually once fully delivered. However, to reflect the partial year effect during the implementation period and the urgency surrounding the earliest possible contribution to the Medium Term Financial Plan, savings of £3.925m are included in the Medium Term Financial Plan proposal for 2024/25 • To further our aim to deliver digital services that are so easy to use that people prefer to use them, while not excluding those that do not (Assisted Digital and existing traditional contact channels such as Face to Face, email, letter etc)
3. Who delivers/will deliver the changed service/policy including any consultation on it and any outside organisations who deliver under procurement arrangements?	• Digital Services • Teams across the Council including Adult Social Care, Children's Services, Customer Management, Debt Management and Project / Change Management • Council Partner organisations and individuals • Application system owners where the system has a public facing portal and has been identified as being able to integrate with the AI solutions
4. Who are the main customers, users, partners, colleagues or groups affected by this decision?	• Users and customers: anybody who has access to Derby City Council and Derby Homes' digital channels. Citizens, businesses, employees (both internal and external) councillors, partners. • Anyone who provides services for the customer channels: temporary and permanent employees, partners, contractors, third party providers.

Step 2 – collecting information and assessing impact

5. Who have you consulted and engaged with so far about this change, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as	**Consultation** The business cases have been co-produced by leaders within the AI field, experienced local government Directors, including in Adult Social Care, and key personnel and lead professionals from all areas of the Council within the scope of the programme. The Council recognises that not all customers can access every channel, so are committed to providing accessible channels for all customer groups with unique accessibility requirements.

accessible locations, interpreters and translations, accessible documents.	The Council is collaborating with the Access, Equality and Inclusion Hub and a range of forums to identify additional measures that can be implemented and will continue to offer face-to-face, human telephony channels and specific accessible channels albeit with potentially modified capacity, to cater for customers' needs. Assisted Digital is the term now being used to describe a range of developments, strategies, and actions aimed at ensuring that no one is left behind.

The Council has set up a Working Group (The Customer Communications Reference Group) of key colleagues and disabled people with a range of impairments to look at the whole range of customer contact channels, AI just being one of them.

Furthermore, a comprehensive marketing plan is being developed aimed at supporting the Council's more vulnerable customers, helping them grasp the new channels, their usage, and the adjustments that are in place to facilitate seamless access.

A marketing plan will also be developed to ensure colleagues understand and are able to use the new solutions.

The Council will also be consulting with residents over the next few months on this transformation programme.

Compliance Board and Ethics

AI Solutions introduced will always remain ethical and under the control of the Council. A Derby AI Compliance Board will be created to ensure that AI solutions operate within ethical boundaries and legal frameworks, safeguarding against bias and protecting vulnerable residents, following guidance from appropriate bodies such as the Equality and Human Rights Commission.

The AI compliance board will cover the following areas:

- **Governance and Ethics:** The board will ensure that AI solutions operate within ethical boundaries and legal frameworks, safeguarding against bias and protecting vulnerable populations.
- **Performance and Risk Management:** The board will monitor and evaluate the AI's performance, addressing risks and ensuring the technology meets its intended objectives while maintaining a human-in-the-loop for critical decision making.
- **Compliance and Engagement:** The board will oversee adherence to data protection laws and engage with stakeholders to maintain transparency and trust in the AI's operations and its impact on residents and employees.
- **Human-in-the-loop:** Recognising the importance of human judgment and oversight in AI solutions, AI Solutions introduced will always have a human-in-the-loop. This means that critical decisions are overseen or reviewed by human experts, ensuring that AI solutions are not operating in isolation and that human values and insights are integrated into AI decision-making processes. Having a human-in-the-loop

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is also essential to provide ethical oversight, ensure accountability, and address complex, unforeseen situations that AI systems may encounter, ultimately fostering responsible development and deployment.

Protecting against Hallucinations, Prejudice and Bias

AI Solutions introduced will protect against hallucinations, prejudice and bias as the Council's AI partner follow best practice and align themselves with the Microsoft policies:

"Your prompts (inputs) and completions (outputs), your embeddings, and your training data:

- *are NOT available to other customers.*
- *are NOT available to OpenAI.*
- *are NOT used to improve OpenAI models.*
- *are NOT used to improve any Microsoft or 3rd party products or services.*
- *are NOT used for automatically improving Azure OpenAI models for your use in your resource (The models are stateless, unless you explicitly fine-tune models with your training data).*
- *Your fine-tuned Azure OpenAI models are available exclusively for your use."*

The Azure OpenAI Service is fully controlled by Microsoft; Microsoft hosts the OpenAI models in Microsoft's Azure environment and the Service does NOT interact with any services operated by OpenAI (e.g. ChatGPT, or the OpenAI API).

Protecting against hallucinations in the context of introducing AI solutions means implementing measures to prevent the AI system from generating or perceiving false or misleading information, images, or experiences. It involves creating safeguards to ensure that the AI accurately interprets and responds to the real world, avoiding instances where it might produce distorted or incorrect outputs that could be perceived as hallucinations.

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6. Using the skills and knowledge in your assessment team or what you know yourself, and from any consultation you have done, what do you already know about the equality impact of the proposed change on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. Only fill in the mitigation box if you think the decision will have a negative impact and then you'll need to explain how you are going to lessen the impact.

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
Age – older and younger people	**Demographic**	**Yes**	**Yes**	**Adult Social Care Reviews**

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
	According to the 2021 census, Derby City had a population of 261,400.

As of 28th February 2023, 3466 people were being supported by the Council:

• 800 in Care or Nursing Homes

• 2666 in the Community.

In 2021-22 there were 9,360 new requests for support:

• 3533 new requests from people aged 18-64 of which 2,443 became unique customers.

• 5,827 for over 65s of which 3608 become unique customers.

We expect this demand to have increase throughout 2022-23, driven almost exclusively by increased demand from older adults. The Office for National Statistics has predicted an ongoing increase in demand for health and social care for the next two decades.

In a report to UK parliament published on 29th June 2023, it is noted that in the UK "age remains one of the most significant predictors of digital exclusion. Around 3.9 million people over 65 (31% of this age group) do not use the internet at home, compared with just 320,000 (4%) for those aged 35-44. More than 3.8 million internet users over 65 are categorised as 'narrow users.' Of the 2.4 million adults with zero basic digital skills, more than half are over 75. But younger groups are also affected. More than one in five users (approximately 1.8 million people) aged 35-44 are 'narrow users.' During the pandemic which began in 2020, one in five children did not have access to an appropriate | | | In terms of the Adult Social Care Review's, they are not about reducing care. An advanced Occupational Therapist led review process of a number of care packages will be undertaken in advance of the AI element of the Adult Social Care Review project and will also inform the development and machine learning of the AI.

• There is inadequate time and resource to right size care packages for both reviewing existing and future needs
• There is inadequate time and resource to carry out financial assessment backlogs and ensure those who can contribute do so
• There is inadequate time and resource to effectively and fully collect debt
• Needs are assessed using a Social Care lens rather than an Occupational Therapy and reablement focus.
• Using an OT model would reduce costs, while still ensuring that residents receive the care they need
• Amongst a range of functionality, the Adult Social Care Co-pilot will do the heavy lifting to assist the Social Worker and present them with the information from which to make care decisions |

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
	device for home study in 2021, according to the Digital Poverty Alliance." **Technical ability and access to technology** Some older people may be less confident with accessing information via electronic and web-based systems or may not have access to technology to access these channels. **Younger People** Young people are often considered the "digital natives" as they have grown up in an era of rapid technological advancements. They are generally more familiar with and adaptable to digital tools, including those powered by artificial intelligence.			• Using the Adult Social Care Co-pilot to assist our human Social Workers will ensure that all care packages are regularly OT assessed, reviewed and funded appropriately **Human-in-the-loop** If customers choose or cannot access the Digital Assistants or other AI Solutions online, they will always be able to use the phone and have the same interaction. They will also have the option to be transferred to a human advisor, during the service's opening hours should the Digital Assistants not be able to fulfil their enquiry. All other channels also remain in place such as Face to Face, email, letter etc. **Technical ability and access to technology** By providing the information from our websites via additional channels, we are helping to ensure as many people as possible can easily access this information. **Opportunities for Younger People** The programme could present opportunities for enhanced educational experiences through AI-

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				driven tools, fostering innovation and critical thinking skills. It may also create new employment prospects in technology fields, contributing to the professional development of young individuals. **Hallucinations, Prejudice and Bias** Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5.
Disability – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments	**Some disabled people with certain impairments can face barriers to accessing digital services** In a report to UK parliament published on 29th June 2023, it is noted that in the UK "people with disabilities account for a disproportionately large number of internet non-users and are more likely to report lower levels of confidence. Disabilities may involve physical or mental impairments which pose different barriers to inclusion. The Lloyds Consumer Digital Index suggests individuals with disabilities are twice as likely to lack the basic digital skills needed to navigate life online."	**Yes**	**Yes**	**Users may have lower learning levels** By providing our information through additional channels., including a WCAG compliant web chat, we are furthering the ability for disabled people to choose the most suitable way to interact with Derby City Council. The current Digital Assistants have built in spelling and grammar checks, paired with Natural Language Processing, to assist with serving answers to questions, even when those questions contain spelling and grammar errors. **Users may have cognitive learning impairments – for example, neurodiversity** By utilising Natural Language Processing, the current Digital

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				Assistants can understand questions even when asked in non-standard ways. The current Digital Assistants can also detect if a suitable answer is not provided, or if a user becomes frustrated, and can escalate this where necessary. This helps ensure the solution will work for everyone, regardless of any such cognitive impairments. **Adult Social Care Reviews** In terms of the Adult Social Care Review's, they are not about reducing care. An advanced Occupational Therapist led review process of a number of care packages will be undertaken in advance of the AI element of the Adult Social Care Review project and will also inform the development and machine learning of the AI. - There is inadequate time and resource to right size care packages for both reviewing existing and future needs - There is inadequate time and resource to carry out financial assessment backlogs and ensure those who can contribute do so - There is inadequate time and resource to effectively and fully collect debt

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				- Needs are assessed using a Social Care lens rather than an Occupational Therapy and reablement focus. - Using an OT model would reduce costs, while still ensuring that residents receive the care they need - Amongst a range of functionality, the Adult Social Care Co-pilot will do the heavy lifting to assist the Social Worker and present them with the information from which to make care decisions - Using the Adult Social Care Co-pilot to assist our human Social Workers will ensure that all care packages are regularly OT assessed, reviewed and funded appropriately **Human-in-the-loop** If customers choose or cannot access the Digital Assistants or other AI Solutions online, they will always be able to use the phone and have the same interaction. They will also have the option to be transferred to a human advisor, during the service's opening hours should the Digital Assistants not be able to fulfil their enquiry. All other channels also remain in place such as Face to Face, email, letter etc.

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				Hallucinations, Prejudice and Bias Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5. **BSL** Deaf people will continue to use British Sign Language (BSL) interpreters and the Council will work closely with the Deaf and Hard of Hearing Peoples Commitment Group.
Gender identity- trans and those people who don't identify with a particular gender, for example, non-binary, genderfluid, genderqueer, polygender and those who are questioning their gender or non-gendered identity.	Not applicable to this project – gender identity has no impact upon the solution, or the service it provided.	**Yes**		**Gender-Neutral Language** The AI solutions will use gender-neutral language throughout and interactions will acknowledge and respect individuals' gender identities. This applies to all characteristics. **Hallucinations, Prejudice and Bias** Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5.
Marriage and Civil Partnership	Not applicable to this project – Marriage and Civil Partnership has no impact upon the solution, or the service it provided.			**Hallucinations, Prejudice and Bias** Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5.
Pregnancy and maternity - women who are pregnant or who have recently	Not applicable to this project – Pregnancy and maternity has no impact upon the solution, or the service it provided.			**Hallucinations, Prejudice and Bias**

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
had a baby, including breast feeding mothers				Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5.
Race - the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community	12.95% of Derby residents do not have English as a first language according to the 2021 census.	**Yes**	**Yes**	**Hallucinations, Prejudice and Bias** Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5. **Multi-lingual Interpretation & Translation** The functionality of current Digital Assistants, Darcie and Ali will be expanded as part of the programme to allow multi-lingual interpretation and translation on both web and phone channels, allowing residents who do not have English as a first language to ask questions, and receive answers, in their preferred language.
Religion or belief or none - the effects on religious and cultural communities, customers and colleagues	Not applicable to this project – Religion or belief has no impact upon the solution, or the service it provided.			**Hallucinations, Prejudice and Bias** Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5.
Sex - the effects on both men and women and boys and girls	Not applicable to this project – Sex has no impact upon the solution, or the service it provided.			**Hallucinations, Prejudice and Bias** Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5.

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
Sexual orientation - the effects on lesbians, gay men, bisexuals, pansexual, asexual and those questioning their sexuality	Not applicable to this project – Sexual orientation has no impact upon the solution, or the service it provided.			**Hallucinations, Prejudice and Bias** Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5.
Those who experience socio-economic disadvantages Please see notes on page 4 to help with this section	**Digital Divide** The digital divide refers to the gap between those who have access to modern information and communication technology (ICT) and those who do not. This divide can be influenced by various factors, including socio-economic status. **Poverty and Access to Technology** In many cases, individuals or households with lower incomes face challenges in accessing technology, including the internet. The cost of devices like computers, smartphones, and broadband services can pose a significant barrier for those on a tight budget. **Socio-economic Disadvantages** The intersectionality of socio-economic disadvantages with other aspects of diversity and protected characteristics, such as disability and age, adds another layer of complexity to the challenges individuals may face. *Disability:* Disabled people may face additional barriers to digital inclusion. Physical, sensory, or cognitive disabilities can affect the use of technology unless accommodations are made.	Yes	Yes	**Human-in-the-loop** If customers choose or cannot access the Digital Assistants or other AI Solutions online, they will always be able to use the phone and have the same interaction. They will also have the option to be transferred to a human advisor, during the service's opening hours should the Digital Assistants not be able to fulfil their enquiry. All other channels also remain in place such as Face to Face, email, letter etc. **Hallucinations, Prejudice and Bias** Any AI Solutions introduced will protect against hallucinations, prejudice and bias – see section 5. **Smartphones** The majority of customers have a smartphone with internet connectivity and all-inclusive minutes. **Digital Inclusion**

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
	Accessible technology, including devices and websites, is crucial for ensuring disabled people can fully participate in the digital world. Affordability of assistive technologies, which can be essential for disabled people, can be a significant challenge for those with lower incomes. *Age:* Older individuals may encounter difficulties in adopting and adapting to new technologies. This can be due to factors such as lack of familiarity or discomfort with digital devices. Economic challenges may intersect with age-related barriers, as older individuals on fixed incomes may find it harder to afford the necessary technology. *Race:* Historical and systemic factors have led to economic disparities among different racial and ethnic groups. For example, people from marginalised racial or ethnic backgrounds may face challenges in terms of income and employment opportunities. *Language Barriers:* Language can be a significant barrier to digital inclusion. Individuals from non-dominant language groups may encounter challenges in accessing online information and services, limiting their participation in the digital space.			We are committed to upholding our socio-economic duty, ensuring that all members of our community can access our services regardless of their financial status or educational background. We provide free Wi-Fi in all Council buildings, allowing users to access the internet without incurring any charges or encourage the use of our Self-Service PCs should they not own a device. We have established Warm Hubs throughout the city, serving as welcoming spaces for residents. These hubs provide not only a warm and friendly environment but also offer hot refreshments and access to internet-enabled devices, ensuring that everyone can stay connected when needed. Our dedicated Welfare Reform team is actively collaborating with our most disadvantaged residents. We are working to provide them with access to devices and affordable or free Wi-Fi solutions. Additionally, we offer Digital Training programs to help them build confidence in using technology, thereby fostering digital inclusion within our community. We have partnered with local charities and the voluntary support

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				sector to create programs that provide financial aid, food assistance, housing support, and other essential services to those in need.

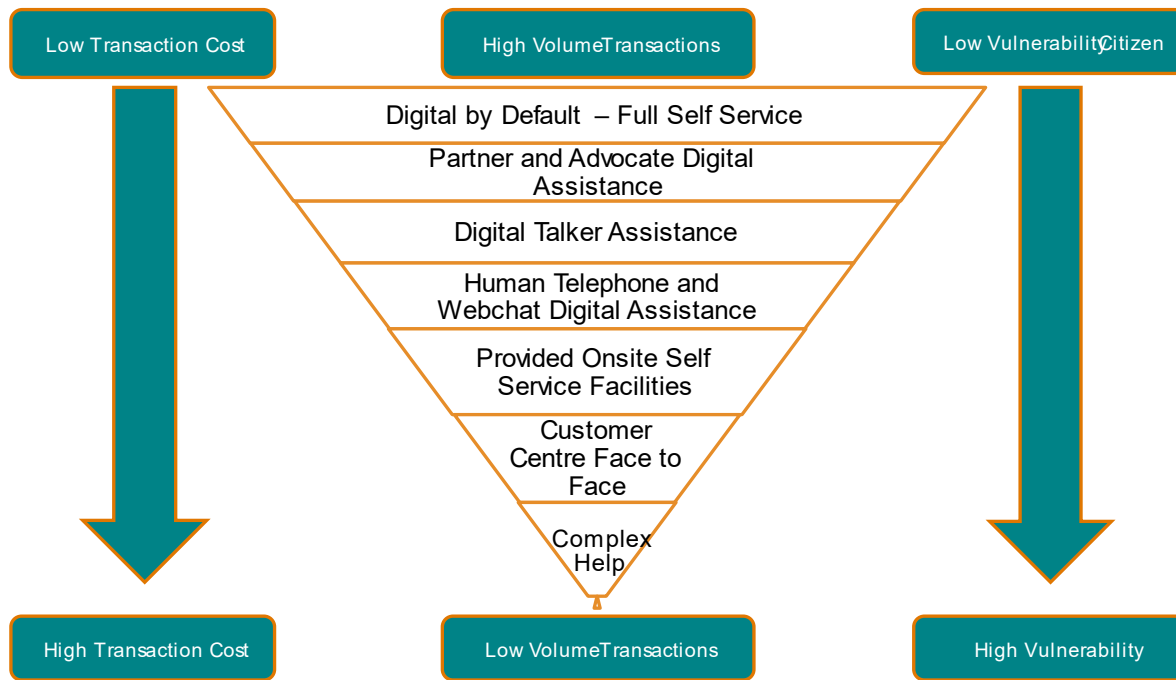We envision no negative impact on any of the equality groups. This AI solutions provide additional functionality or additional channels for residents to receive information from Derby City Council, making it easier for everyone, and especially those with accessibility requirements who may prefer alternative ways of contacting us.

An "Assisted Digital" provision will always be provided via Derby Direct (telephone), Front of House (Face to Face), Advocate access (personal or council partner organisation), provision of equipment, or focussed / tailored support for individual complex needs. The AI solutions will be set up in such a way that if they cannot assist a user they will assist them in finding the help they need, in line with the Preventing Exclusion principle of Assisted Digital, as follows:

Preventing Exclusion by "Assisted Digital"
Leveraging self-service, but supporting those who can't

Low Transaction Cost

High Volume Transactions

Low Vulnerability Citizen

Digital by Default – Full Self Service

Partner and Advocate Digital Assistance

Digital Talker Assistance

Human Telephone and Webchat Digital Assistance

Provided Onsite Self Service Facilities

Customer Centre Face to Face

Complex Help

High Transaction Cost

Low Volume Transactions

High Vulnerability

Step 3 – deciding on the outcome

7   What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?

Outcome 1	Yes	**No major change needed** – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
Outcome 2	No	**Adjust the proposal** to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
Outcome 3	No	**Continue the proposal** despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are: • sufficient plans to stop or minimise the negative impact • mitigating actions for any remaining negative impacts • plans to monitor the actual impact.
Outcome 4	No	**Stop and rethink** the proposal when the EIA shows actual or potential unlawful discrimination

Why did you come to this decision?

The overall aim of this programme is to transform the Council using AI Technology. The AI solutions introduced represent a forward-thinking approach to public sector innovation. By strategically implementing AI technologies, the Council aims to revolutionise its service delivery, set new standards in public administration efficiency, and better serve the community.

If customers choose or cannot access the Digital Assistants or other AI Solutions online, they will always be able to use the phone and have the same interaction. They will also have the option to be transferred to a human advisor, during the service's opening hours should the Digital Assistants not be able to fulfil their enquiry.

All other channels also remain in place such as Face to Face, email, letter etc.

Appendix 1

Equality impact assessment form– please read this section first before you do the assessment

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact, you need to do an equality impact assessment whenever a decision is needed about our services and functions that affects people and **before** that decision is made. This also includes quick Covid 19 related decisions.

We use the term 'policy' as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories…

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures.
- Key decisions such as allocating funding to voluntary organisations, budget setting.
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays.

So why do we need to do equality impact assessments?   Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases.   This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to complete them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have '**due regard'** to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a '**relevant protected characteristic'** and people who don't. The nine protected characteristics are age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race religion and belief, sex and sexual orientation.

Having 'due regard' means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

Assessing Socio-Economic Duty (SED) as part of the EIA

The Council agreed to voluntarily implement the Socio-Economic Duty alongside our Public Sector Equality Duty categories in May 2022.

We have added a section to this impact assessment template on the Socio-Economic Duty) to make sure we actively consider how our decisions can contribute to reducing inequalities resulting from socio-economic disadvantage.

Areas to actively consider in the decision-making process when assessing the SED include thinking about:

- what are the
- intended aims and/or outcomes of the policy or decision being made?
- whether the assessment of the duty taking place is through all stages of development?
- whether there a particular socio-economic impact for certain groups?
- how people in communities can have an active say in the decision-making process
- whether the policy/decision actively can contribute to reducing inequality outcomes?
- considering how you can engage with people with lived experience of SED?
- collecting and actively considering evidence and stories of residents' lived experiences in implementing the SED. You can get more information on the [corporate insight](#) pages on SharePoint.

When you consider the SED you need to identify if the decision requires analysis of socio-economic factors such as:

- people who live in deprived areas

- households with low income
- people who are in low paid employment
- people who are homeless or are at risk or homelessness
- people who face barriers to employment such as low levels of educational attainment
- people who are or have been care experienced
- people who care for others
- people who face multiple deprivation through a combination of these factors

This completed form should be attached to any Corporate Leadership, Senior Leadership, Cabinet or Personnel Committee report to help decision makers take the equality implications into account when they make the decision. Equality impact assessments **must be done before** decisions are made.

You'll find that completing these assessments will help you to:
- understand your customers' and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Unless this is a quick Covid 19 decision, don't do the form by yourself. Get a small team together and make sure you include key people in the team such as representatives from our Equality Hubs and Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment.   Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

Remember, we need to complete these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010. If in doubt – it's better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website.** It is a public document so must not contain any jargon and must be easy to understand.

Contact for help

Ann Webster – Lead on Equality and Diversity
ann.webster@derby.gov.uk
Tel 01332 643722 mobile 07812301144 Relay UK 18001 01332 643722
Sign Language Service

Shelley Harrod – Policy and Consultation Manager
shelley.harrod@derby.gov.uk
Tel 01332 640995 Relay UK 18001 01332 640995
Sign Language Service

We can give you this information in any other way, style or language that will help you access it. Please contact us on **01332 643722, 07812301144** or **derby.gov.uk/signing-service/**

Punjabi
ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਇੱਥੇ ਸੰਪਰਕ ਕਰੋ: **01332 64XXXX** ਜਾਂ **derby.gov.uk/signing-service/**

Polish
Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku. Prosimy o kontakt: **01332 64XXXX** lub **derby.gov.uk/signing-service/**

Slovak

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Prosím, kontaktujte nás na tel. č.: **01332 64XXXX** alebo na stránke **derby.gov.uk/signing-service/**

Urdu

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم **01332 640000** یا **derby.gov.uk/signing-service/** پر ہم سے رابطہ کریں