**Equality Screening Form**

**INTRODUCTION**

The information contained in this Equality Screening Form has been extracted from the Equality Commission for Northern Ireland’s Guide for Public Authorities (2010). Additional information about the 5 parts of the form and a flowchart to demonstrate the process of completion is detailed in [**Appendix 1**](#Appendix1) of the form.

This template document and further guidance can be found by clicking the following link - [www.equalityni.org/S75duties](https://www.equalityni.org/S75duties)

**PART 1- POLICY SCOPING**

The first stage of the screening process involves scoping the policy under consideration. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy, being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

Public authorities should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

**Information about the policy**

|  |  |
| --- | --- |
| **Name of Policy** | Generative AI Policy |
| **Is it existing, revised or a new policy?** | Existing |[ ]  New |[x]  Revised |[ ]
| **If revised, please outline main updates:** |  |
| **What is it trying to achieve?** **(Intended aims/outcomes)** | Generative AI (GenAI) refers to artificial intelligence systems designed to create new content, such as text, images, audio, or code, based on patterns learned from large datasets. These tools, like ChatGPT or Co-Pilot, generate outputs in response to user prompts by predicting the most relevant or likely results. GenAI is widely used for tasks such as drafting documents, answering questions, creating visuals, or coding. It offers significant efficiency and creativity benefits, and the technology is growing rapidly.However, its reliance on training data and algorithms raises ethical, legal, and operational challenges, and the information users enter into these systems can be kept by the model to train itself.This policy is to ensure that we use Generative AI technology in a lawful, ethical and responsible way.**For clarity, this policy does not relate to the use of AI in areas such as direct customer interaction, recruitment practices etc. which can have major equality impacts – it is a ‘starting point’ on AI-assisted content creation.**Until the adoption of the policy, Translink neither approved nor forbade the use of such technology. The policy now actively permits the use of the technology (innovation), but places safeguards and responsibilities around that use (responsibility).It defines acceptable and prohibited uses and outlines employee (and contractor/consultant) obligations related to the use or development of GenAI models and applications (e.g. Co-Pilot, ChatGPT etc.)One of the main drivers is to ensure the protection of Translink’s confidential information and staff/customer personal data which should not be entered into open source models. |
| **Are there any Section 75 categories which might be expected to benefit from the intended policy? If so, explain how.**  | * Staff using GenAI tools can produce clearer, more accessible communication materials, ensuring information is easily understood by all groups, including those with disabilities or limited language proficiency. These tools are useful in better tailoring messages to audiences.
* Clear guidance to be aware of biased or discriminatory outputs ensures that GenAI tools do not perpetuate stereotypes or inequalities when used in customer communications or policy drafting. The policy ensures staff understand the need to review and validate output.
* GenAI tools, particularly those integrated with existing systems such as licenced Co-Pilot, can help staff respond more efficiently to queries or issues, reducing delays that may disproportionately impact groups like older people, those with disabilities, those with dependents etc. who rely heavily on timely public transport services.
 |
| **Who initiated or wrote the policy?**  | Data Governance Manager, Legal and Governance Dept. in consultation with CTO and SIRO |
| **Who owns and who implements the policy?** | **Owner:** Data Governance Manager**Implementation:** various teams including information governance team, IS/IT, Digital Steering Group and line general line management across the business. |

**Implementation Factors**

|  |  |
| --- | --- |
| Yes |[x]  No |[ ]

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

If yes, are they: (Select all applicable)

|  |
| --- |
|[ ]  Financial |
|[ ]  Legislative |
|[x]  Other – please specify:  | * Ability to restrict unapproved GenAI tools, which are being developed rapidly;
* Communication to staff of various levels
 |

**Main stakeholders affected**

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

|  |
| --- |
|[x]  Staff |
|[x]  Service Users |
|[ ]  Other Public Sector Organisations |
|[ ]  Voluntary/ Community/ Trade Unions |
|[x]  Other – please specify: | General public |

##### [Other policies with a bearing on this policy](#Onefour) (please list):

|  |
| --- |
| * IT Security Policy
* Cyber Liability Policy
* Information Governance Policy
* Data Protection Policy
* HR disciplinary policies
 |

**Available Evidence**

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data. The following document should help you source data - [Section 75 - Evidence Signposting Guide](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/S75DataSignpostingGuide.pdf)

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

|  |  |
| --- | --- |
| **Section 75 category** | **Details of evidence/information** |
|  | Open-source GenAI models are often trained on large datasets scraped from the internet, which may include biased, unrepresentative, or discriminatory content. The use of these tools can present discrimination risks when used without proper care, checking and safeguards. Below are key risks associated with their use. These include:**Bias in Training Data:** Outputs may reflect stereotypes due to biased datasets.**Lack of Accountability:** Limited transparency makes biases harder to identify or correct.**Inappropriate Outputs:** Tools can generate harmful or discriminatory content.**Over-Reliance:** Employees may trust biased outputs without critical review.**Underrepresentation:** e.g. of a particular racial group, sexual orientation etc.Gen AI is an emerging technology and recent studies have found that its proliferation can be both positive and negative in relation to equality-related issues. For example: Capraro et al, The impact of generative artificial intelligence on socioeconomic inequalities and policy making [PNAS Nexus, Volume 3, Issue 6, June 2024, pg. 191]:*Generative artificial intelligence (AI) has the potential to both exacerbate and ameliorate existing socioeconomic inequalities. In this article, we…highlight how generative AI could worsen existing inequalities while illuminating how AI may help mitigate pervasive social problems.*Translink will continually review the evidence and learning as may arise over time. Importantly, however, it should be noted that the intention of the relevant policy is one of ***mitigation against*** the negative outworkings of Gen AI tools, requiring staff attention and checking, and encouraging staff not to accept at face value the outputs generated. |
| Religious belief | As above |
| Political opinion | As above |
| Racial group | As above |
| Age | As above |
| Marital status | As above |
| Sexual orientation | As above |
| Men and women generally | As above |
| Disability | As above |
| Dependants | As above |

**Needs, Experiences and Priorities**

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision?

Specify details for each of the Section 75 categories.

|  |  |
| --- | --- |
| **Section 75 category** | **Details of needs/experiences/priorities** |
|  | All section 75 groupings can potentially be impacted by a lack of checking, care and oversight of generative AI outputs. Depending on the scenario, these impacts may be positive (whereby evidence is indicating that algorithms or large language models can bias towards certain ‘majority’ groups) or negative (where the opposite can be true for minority groups). It should be noted that the intention of the relevant policy is one of ***mitigation against*** the negative outworkings of Gen AI tools, requiring staff attention and checking, and encouraging staff not to accept at face value the outputs generated. |
| Religious belief |  As above |
| Political opinion |  As above |
| Racial group |  As above |
| Age |  As above |
| Marital status |  As above |
| Sexual orientation |  As above |
| Men and women generally |  As above |
| Disability |  As above |
| Dependants |  As above |

**PART 2 - SCREENING QUESTIONS**

**Introduction**

In making a decision as to whether or not there is a need to carry out an equality impact assessment, the public authority should consider its answers to the questions 1-4 which are given on pages 66-68 of the Guide: [Guide for Public Authorities April 2010](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/S75GuideforPublicAuthoritiesApril2010.pdf)

Taking into account the evidence presented above, consider and comment on the likely impact on equality of opportunity and good relations for those affected by this policy, in any way, for each of the equality and good relations categories, by applying the screening questions given overleaf and indicate the level of impact on the group i.e. minor, major or none.

**Impact: Major / Minor / None**

If the public authority’s conclusion is **major** in respect of one or more of the Section 75 equality of opportunity and/or good relations categories, then consideration should be given to subjecting the policy to the equality impact assessment procedure.

**In favour of ‘MAJOR’ impact**

|  |  |
| --- | --- |
| **A** | The policy is significant in terms of its strategic importance; |
| **B** | Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them; |
| **C** | Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged; |
| **D** | Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities; |
| **E** | The policy is likely to be challenged by way of judicial review; |
| **F** | The policy is significant in terms of expenditure. |

If the public authority’s conclusion is **minor** in respect of one or more of the Section 75 equality categories and/or good relations categories, then consideration should still be given to proceeding with an equality impact assessment, or to:

* Measures to mitigate the adverse impact; or
* The introduction of an alternative policy to better promote equality of opportunity and/or good relations.

**In favour of ‘MINOR’ impact**

|  |  |
| --- | --- |
| **A** | The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible; |
| **B** | The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures; |
| **C** | Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people; |
| **D** | By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations. |

If the public authority’s conclusion is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then the public authority may decide to screen the policy out. If a policy is ‘screened out’ as having no relevance to equality of opportunity or good relations, a public authority should give details of the reasons for the decision taken.

**In favour of ‘NONE’**

|  |  |
| --- | --- |
| **A** | The policy has no relevance to equality of opportunity or good relations. |
| **B** | The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.  |

**Screening Questions 1 - 4**

|  |
| --- |
| **Screening Question 1**  |
| What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? Minor/ Major/ None |
| Section 75 category | Details of policy impact | Level of impact? Minor/Major/None |
| Religious belief | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |
| Political opinion | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |
| Racial group | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |
| Age | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |
| Marital status | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |
| Sexual orientation | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |
| Men and women generally | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |
| Disability | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |
| Dependants | Proper application of the policy will ensure that any impacts on individuals will be negligible. | Minor |

|  |
| --- |
|  **Screening Question** **2**  |
| Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories? |
| Section 75 category | If **Yes**, provide details | If **No**, provide reasons |
|  |  | The central intention of the policy is to ensure an appropriate use of Gen AI technology, with a view to data security and mitigating against negative outworkings of Gen AI tools. Any potential equality-related benefits available through the use of the technology, but those would require fuller consideration at a later time and are not the intention of this policy. |
| Religious belief |  |  No |
| Political opinion |  | No |
| Racial group |  | No |
| Age |  | No |
| Marital status |  | No |
| Sexual orientation |  | No |
| Men and women generally |  | No |
| Disability |  | No |
| Dependants |  | No |

|  |
| --- |
| **Screening Question** **3**  |
| To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Minor/ Major/ None |
| Good relations category | Details of policy impact | Level of impact Minor/Major/None |
| Religious belief | The central intention of the policy is to ensure an appropriate use of Gen AI technology, with a view to data security and mitigating against negative outworkings of Gen AI tools. Any potential equality-related benefits available through the use of the technology, but those would require fuller consideration at a later time and are not the intention of this policy. | None |
| Political opinion | As above | None |
| Racial group | As above | None |

|  |
| --- |
| **Screening Question 4**  |
| Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group? |
| Good relations category | If **Yes**, provide details | If **No**, provide reasons |
| Religious belief |  | The central intention of the policy is to ensure an appropriate use of Gen AI technology, with a view to data security and mitigating against negative outworkings of Gen AI tools. Any potential equality-related benefits available through the use of the technology, but those would require fuller consideration at a later time and are not the intention of this policy. |
| Political opinion |  | As above |
| Racial group |  | As above |

**Additional Considerations**

**Multiple Identity**

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?  (For example: disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

|  |
| --- |
| None |

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

|  |
| --- |
| None |

**PART 3 - SCREENING DECISION**

If the decision is **not** to conduct an **equality impact assessment**, please provide details of the reasons.

|  |
| --- |
| No equality impact assessment required – only minor potential issues have been identified, on which it is actually the policy’s intention to better guide staff. |

If the decision is not to conduct an equality impact assessment the public authority should consider if the policy should be **mitigated or an alternative policy be introduced**.

|  |
| --- |
| The intention of the relevant policy itself is one of ***mitigation against*** the negative outworkings of Gen AI tools, requiring staff attention and checking, and encouraging staff not to accept at face value the outputs generated. |

If the decision **is to** subject the policy to an **equality impact assessment**, please provide details of the reasons.

|  |
| --- |
| N/A |

All public authorities’ equality schemes must state the authority’s arrangements for assessing and consulting on the likely impact of policies adopted or proposed to be adopted by the authority on the promotion of equality of opportunity. The Commission recommends screening and equality impact assessment as the tools to be utilised for such assessments. Further advice on equality impact assessment may be found in a separate Commission publication: Practical Guidance on Equality Impact Assessment.

**Mitigation**

When the public authority concludes that the likely impact is ‘minor’ and an equality impact assessment is not to be conducted, the public authority may consider mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Can the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations?

If so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative policy.

|  |
| --- |
| No. |

**Timetabling and Prioritising**

Factors to be considered in timetabling and prioritising policies for equality impact assessment.

If the policy has been **‘screened in’** for equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

|  |  |
| --- | --- |
| **Priority Criterion** | **Rating (1-3)** |
| Effect on equality of opportunity and good relations  | Not Applicable |
| Social need | Not Applicable |
| Effect on people’s daily lives | Not Applicable |
| Relevance to a public authority’s functions | Not Applicable |

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the public authority in timetabling. Details of the Public Authority’s Equality Impact Assessment Timetable should be included in the quarterly Screening Report.

Is the policy affected by timetables established by other relevant public authorities?

If yes, please provide details:

|  |
| --- |
|  |

**PART 4 - MONITORING**

Public authorities should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007).

The Commission recommends that where the policy has been amended or an alternative policy introduced, the public authority should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Effective monitoring will help the public authority identify any future adverse impact arising from the policy which may lead the public authority to conduct an equality impact assessment, as well as help with future planning and policy development.

|  |
| --- |
| The policy will be kept under regular review as the technology evolves. Further, Translink can consider complaints from the public relating to AI-generated content.It should be noted that AI tools have been in regular use among some staff for a while without major issue, and that the main policy intent is not around equality concerns but on safeguarding information being inputted. |

**PART 5 - APPROVAL AND AUTHORISATION**

|  |  |  |  |
| --- | --- | --- | --- |
| **Policy Title:** | Generative AI Policy | **Version No:** | **1.0** |
| **Screened By:** |
| Conor Creaney | Data Governance Manager  |  | 16 January 2025 |
| **Approved by:** |
| Priscilla Rooney | General Counsel  |  | 29 January 2025 |

Note: A copy of the Screening Template, for each policy screened should be ‘signed off’ and approved by a senior manager responsible for the policy, made easily accessible on the public authority’s website as soon as possible following completion and made available on request.

**APPENDIX 1**

|  |  |  |
| --- | --- | --- |
| **Part**  | **Part Title** | **Description** |
| **1** | [**Policy Scoping**](#Part1) | Asks public authorities to provide details about the policy, procedure, practice and/or decision being screened and what available evidence you have gathered to help make an assessment of the likely impact on equality of opportunity and good relations |
| **2** | [**Screening Questions**](#Part2) | Asks about the extent of the likely impact of the policy on groups of people within each of the Section 75 categories. Details of the groups consulted and the level of assessment of the likely impact. This includes consideration of multiple identity and good relations issues.  |
| **3** | [**Screening Decision**](#Part3) | Guides the public authority to reach a screening decision as to whether or not there is a need to carry out an equality impact assessment (EQIA), or tointroducemeasures to mitigate the likely impact, or the introduction of an alternative policy to better promote equality of opportunity and/or good relations. |
| **4** | [**Monitoring**](#Part4) | Provides guidance to public authorities on monitoring for adverse impact and broader monitoring. |
| **5** | [**Approval and Authorisation**](#Part5) | Verifies the public authority’s approval of a screening decision by a senior manager responsible for the policy. |

Policy Scoping

* Policy
* Available data

Screening Questions

* Apply screening questions
* Consider multiple identities

Screening Decision None/Minor/Major

Mitigate

Publish Template

Re-consider screening

Publish Template for information

Publish Template

EQIA

Monitor

**‘None’**

Screened out

**‘Major’**

Screened in for EQIA

**‘Minor’**

Screened out with mitigation

Concerns raised with evidence

Concerns raised with evidence re: screening decision