

South Cambridgeshire District Council Equality Impact Assessment (EqIA)

Introduction – Please read

Equality Impact Assessments (EqIAs) allow the Council to:

- Show that the Council are meeting its legal duty, demonstrating due regard for the provisions of the [Public Sector Equality Duty](#) as below:
 - Eliminate unlawful discrimination, harassment, and victimisation
 - Advance equality of opportunity between those who share a protected characteristic and those who do not
 - Foster good relations between those who share a relevant protected characteristic and those who do not
- Methodically consider and assess the impacts of proposals across the [nine protected characteristics](#)
- Allow the Council to develop and implement high quality proposals that maximise positive outcomes for all.

EqIAs should be completed during the development and review of all Council policies, strategies, procedures, projects or functions. Where there is any doubt, the completion of an EqIA is always recommended.

When the form is completed, please send an electronic copy to equality.schemes@scambs.gov.uk. Further support and guidance, [including a video on how to fill out EqIAs](#), is available on Insite or you can contact the Policy and Performance Team.

Equality Impact Assessment Complete Form

Section 1: Identifying Details

- 1.1 Officer completing EqIA:
Sonia Constant
- 1.2 Team and Service:
PMO, Transformation
- 1.3 Title of proposal:
AI Customer Interaction Project
- 1.4 EqIA start date:
01/10/2024
- 1.5 Proposal implementation date:
28/10/2024
- 1.6 Who will be responsible for implementing this proposal (Officer and/or Team):
Representatives across the Council; contact centre, transformation, 3C ICT and supporting officers.

Section 2: Proposal to be Assessed

- 2.1 Type of proposal:
Service
If other, please specify
N/A
- 2.2 Is the proposal:
New
- 2.3 State the date of any previous equality impact assessment completed in relation to this proposal (if applicable):
N/A

2.4 What are the headline aims of the proposal and the objectives that will help to accomplish these aims? (Max 250 words)

This is to undertake the purchase and implementation of an AI system that will support the Contact Centre with chat and voice enquiries from customers. The system is designed to help the public with their enquiries, faster than a human could. However, there are additional benefits, one of which is that AI reduces the impact on the Contact Centre as it will deflect calls to a human agent. This project will explore the data gathered in the AI tool to help us understand what could be further supported by using this technology, this will support continual service improvement. The project team are identifying risks and opportunities, their severity and this is being captured in the AI risk log in SmartSheet.

2.5 Which of the Council's equality objectives (as detailed in the Council's Equality Scheme) does this proposal link to or help to achieve?

- Identify, prioritise and deliver actions that will narrow the gap in outcomes between disadvantaged groups and the wider community
- SCDC is an employer that values difference and recognises the strength that a diverse workforce brings.
- Protected characteristic groups have a voice and are represented in forming the future shape of the district.
- None.

2.6 Which groups or individuals will the proposal affect:

- Service Users
- Councillors
- External Stakeholders
- Other
- Employees

If other, please specify [Click or tap here to enter text.](#)

2.7 Broadly speaking, how will these groups or individuals be affected? (you will be asked to provide more detail on the specific impacts on different protected characteristic groups later in the form) (max 250 words)

There are positive impacts on the groups or individuals that are affected: increased accessibility as the tool is available 24/7, multilingual support and ease of use. AI can answer questions quickly, in most cases instantly. The tool can automate processes meaning they can be standardised and streamlined. The answers from AI can be tailored to users to offer personalised responses and will be in a consistent tone.

Some negative impacts are AI may not understand the more complex enquiries, for example understanding why a customer may have got into arrears with their rental payments. Sometimes AI can misunderstand the questions, meaning responses might not make sense to the customer. In some cases, AI can misinterpret emotion and not offer emotional responses where it may have been needed. Some customers may be concerned about how their data is stored and if the product is securely set up. Technical barriers might be due to unfamiliarity with the technology or misunderstandings of subtle cultural or linguistic cues.

Mitigating against these the Council will:

Provide a Human Alternative: Allow users to escalate issues to a human agent when needed.

Transparency: Inform users about data usage and security measures.

Continuous Improvement: Regularly update the chatbot to address user feedback and improve performance.

Inclusive Design: Ensure the chatbot is accessible to people with disabilities and supports diverse languages and dialects.



- 2.8 If any part of the proposal is being undertaken by external partners, please specify how the Council will ensure that they will meet equality standards?
(Max 250 words)

The services will be provided by a third party, although there may be some local support during implementation by 3CICT and the services involved. Suppliers will comply with the Council's policies on equality and with the Equalities Act. This will be monitored in regular contractual meetings with suppliers, and if any standards are not being met this will be remedied immediately as per the GCloud 13 Framework Contract.

Section 3: Evidence and Data

- 3.1 Describe any work you have done (this could include consultation) to understand any effects on groups of people, including those within [9 protected characteristic groups?](#) Please list any key sources (e.g. web-search, previous versions of document, customer feedback etc) that you used to reach your conclusions.
(Max 250 words)

Discussions with the supplier, EBI, to ensure the software is accessible to as many customers as possible, and that data is protected. The software has an inbuilt redaction process, which automatically redacts personal information through pattern matching, which identifies key information such as email addresses, postcodes, phone numbers, and account numbers. Additionally, a blanket redaction is applied whenever the assistant explicitly requests PII, ensuring any subsequent user input is fully redacted regardless of content. The software does not hold any personally identifiable information.

This project is focused on expanding access to council services, providing additional options rather than replacing existing services. By introducing the AI assistant, you aim to enhance accessibility, allowing individuals to choose the interaction method that best suits their needs. This will be monitored on an

ongoing basis to ensure that customers are utilising the software, and any feedback is dealt with accordingly.

For those where English isn't their first or main language, the chat version of the application supports language translation based on the browser's language settings, so customers with other language settings will automatically get translated information.

Procurement officer conducted a thorough review of the supplier's contract to ensure they will support the Council's requirements for equality and the Equality Act itself.

This project is focused on expanding access to council services, providing additional options rather than replacing existing services. By introducing the AI assistant, the Council aims to enhance accessibility, allowing individuals to choose the interaction method that best suits their needs. For example, those who prefer digital interactions now have an AI option, while others who need or prefer direct human assistance can benefit from reduced wait times on phone lines. By handling high-volume, routine inquiries through AI, we enable council staff to dedicate more time to complex or sensitive issues, enhancing service quality for residents who require additional support.

- 3.2 If you have not undertaken any consultation, please detail why not, or when consultation is planned to take place.

(Max 250)

The technology and provider could change, however, the facilities will not be reduced or the existing services will not be restricted.

Section 4: Impact of proposal on those with protected characteristics

4.1 Please select all characteristics that may or will be impacted (positive or negative). When providing details of the impact please consider the following questions

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. (both the number of persons affected and the severity of the impact)
- you will be asked to set out actions to manage these impacts in the following question (4.2)

All - general to all protected Characteristics.

Details: The AI system is to complement the services that we provide already, not to take anything away or remove capacity in the contact centre. The purpose of the tools is to enhance the services we already provide and give customers different options for support.

Age

Details: No

Disability

Details: A telephone service may have a negative impact on the hearing impaired, medium, impact. There are digital alternatives to voice and the tool can be used with screen readers such as HAL and JAWS.

The Chat Assistant may have a negative impact on the visually impaired, medium, impact. There are voice alternatives to digital as the customer can call the Council's number and receive the same level of support from the AI tools. The voice AI simply listens to the customers words, transcribes it to a text format and routes it to the correct agent and/or provide the customer with the answer. This will be dependent on whether the AI has been trained to answer the question or not. Voice AI will only



answer questions that it has been specifically trained on. If AI cannot answer the question, it will add the customer to the next available agent and the transcription will be offered to the agent, so the agent understands the customers enquiry. This avoids the customer having to repeat their enquiry.

Gender reassignment

Details: No

Marriage and Civil Partnership

Details: No

Pregnancy and maternity

Details: No

Race

Details: No

Religion and belief

Details: No

Sex

Details: No

Sexual orientation

Details: No

None of the above

4.2 Other characteristics

Some characteristics are not yet protected in law, but the Council has made declarations it will consider them in policy making.

Digital inclusion ([what is this?](#))

Details: The Digital solution and Voice solution will be one and the same, if a customer cannot use the digital version of the AI they can use the same technology via voice. So the customer will have the same choices that they do now to contact the council and will not be limited by either or. The AI will sometimes get the answer



wrong; the Council will be monitoring the feedback and re-training the AI and updating the website to ensure that the correct information is provided the next time the question is asked. This is being monitored daily.

SCDC have specified an accuracy rate of 90% to go live, industry benchmarks are set at around 85% for contact centre services. We expect the AI tool to understand 90%+ intent from our customers, whether the tools can answer the question sufficiently will depend on training, access to information from our website and access to back-office systems to seek further clarity to some enquiries. As we develop and train the tools the intent understanding will increase and improve, this is something that is likely to develop across the first year of using the software. The system will never be 100% accurate, this is unfortunately down to the fact that everyone will ask a question in a different way, and we can never be fully prepared for every instance of question. However, the more questions the AI receives, the more it learns.

The Council is currently updating the website content and look and feel, this means all content should be relevant and accurate. This will support the AI tools and ensure answers to customers are also relevant and accurate. So, we expect to see a rise in response accuracy from the AI tools once the website has been published. Response accuracy across the chat bot industry is between 70-90%.

The AI Tools have a confidence threshold, this is set to 80%, the contact centre are manually adding in fallback responses for if the confidence is low and this is continually monitored to help train the tools as it is being used.

Care experience ([what is this?](#))

Details: No

Rurality

Details No

Socio-economic

Details No

4.3 Considering the above impacts you have identified above, please detail any actions (specific or general) which may help to enhance or mitigate impacts.

Please include the timescale for completing the action.

Action and timescale	Officer
<p>Accessibility enhancements:</p> <p>Ensure compatibility with screen readers such as HAL and JAWS for visually impaired users.</p> <p>Provide clear instructions on using both digital and voice services for customers with disabilities.</p> <p>Implement ongoing updates to maintain alignment with accessibility standards.</p> <p>Timescale = by December 2025</p>	<p>Nicole Stimson / Sonia Constant</p>
<p>Alternative channels:</p> <p>Maintain traditional communication methods (e.g., telephone) for those who may struggle with digital platforms, including the elderly and those with disabilities.</p> <p>Ensure that both digital and voice AI options provide equivalent access to services.</p> <p>Timescale = completed</p>	<p>Rachael Fox- Jackson / Sonia Constant</p>
<p>Language and translation:</p> <p>Ensure the chat assistant supports multiple languages, automatically translating based on browser settings.</p> <p>Offer manual language support options where automatic translation is insufficient.</p> <p>Timescale = completed.</p>	<p>Rachael Fox- Jackson / Sonia Constant</p>
<p>Digital inclusion measures:</p> <p>Promote digital literacy initiatives to ensure that all users, including those from rural and socio-economically</p>	<p>Sonia Constant / Kate Yerbury ?</p>

disadvantaged backgrounds, can effectively use the digital tools provided.

Offer support for users unfamiliar with AI systems, such as step-by-step guides and video tutorials.

Timescale = by December 2025.

4.4 How will you monitor that the above actions have been completed and that this proposal, once implemented, is impacting fairly on everyone it affects? In answering this question, please include information about feedback you will seek and/or data you will collect and analyse, and how often you will do this

Monitored as part of AI Board.

Section 5: Summary

5.1 Briefly summarise the key findings of the EqIA and any significant equality considerations that should be taken into account when deciding how to proceed with the proposal (this section can be included within the 'equality implications' section of any committee reports). (Max. 250 words)

We are putting a chatbot on the website to support customers with enquiries, 24/7, the chatbot can answer any information request that comes through and in some cases localised requests (when is my bin date). This not only gives the customer a quicker response than a human, but at a time that suits them.

We are complementing this service by providing AI over our phone lines, to support customers that call us in the same manner: answering all information requests and in some cases localised requests. This means a customer could call us after closing times and still get support at a time that suits them.

Some services will still require a human to support the customer, this will be communicated by the AI tool and captured in the telephony system. If within

operating hours the agents will support the customer at the time of passing through, if this is outside operating hours the call will be logged for an agent to complete the next working day.

5.2 Confirm the recommendation of the officer completing the EqIA:

Proceed with the proposal (with any actions identified as required within Section 4 of the EqIA). Analysis demonstrates that the proposal is robust, we have taken all appropriate opportunities to advance equality and foster good relations between groups.

Reject the proposal: Analysis demonstrates that the proposal will cause unlawful discrimination and it must be removed or changed

Section 6: Sign Off

6.1 Signature of individual completing EqIA:

Sonia Constant

6.2 Date of completion:

11/11/2024

6.3 When will this proposal next be reviewed and who will this be? (when in doubt 3 years minimum)

01/11/2027

6.4 Approving officer signature *, this should be your Head of Service, Service Area Manager, or Project Sponsor:

Jeff Membery

6.5 Date of approval:

19/02/2025



Please send the completed document to Equality.Schemes@scambs.gov.uk for publishing on the website.

**in the event that this EqIA is completed by Head of Service, then no additional approving signature is required.*