

Checklist

Practical & Ethical Issues Surrounding the Use of AI in Communication

29-30 May 2024, Ljubljana, Slovenia





Acknowledgments

This publication is prepared based on discussion sessions with coordinators of Equinet's Communication Strategies and Practices Working Group. It provides detailed information and recommendations on themes identified during the "Practical and Ethical Issues Surrounding the Use of AI in Communication" training which was held on 29 and 30 May 2024 in Ljubljana, Slovenia. The training was attended by members of the Communication Strategies and Practices Working Group.

Author

Ruona Meyer

The following individuals are acknowledged for their recommendations on the first draft of this document:

- Ana Tretinjak, Co-Moderator of Equinet's Communication Strategies and Practices Working Group, Ombudswoman of the Republic of Croatia
- Teresa Pedreira, Equinet European Network of Equality Bodies
- Chiara D'Agni, Equinet European Network of Equality Bodies
- Ilaria De Capitani, Equinet European Network of Equality Bodies

Table of Contents

Definitions ad Abbreviations1				
S	ource	25	2	
Ove	erviev	Ν	3	
1.	1. Needs Assessment			
1	.1	Your AI Needs Assessment Template	5	
2.	Ethi	cs and Responsible Use of AI in Communication	6	
2	.1	Anonymisation	6	
2	.2	Transparency and Exposure	7	
	AL	Ise Statement, Tagline and Disclaimers Templates	8	
2	.3	Environmental and Social Impact	9	
3.	Risk	Reduction	.10	
•••	Risk	Stock Content Creation Guidelines		
3			ed.	
3	.1 .2	Stock Content Creation Guidelines	ed. . 10	
3	.1 .2	Stock Content Creation Guidelines Crisis Response Guidelines	ed. . 10 . 10	
3	.1 .2 Cris	Stock Content Creation Guidelines Error! Bookmark not define Crisis Response Guidelines is Response Statement Templates	ed. . 10 . 10 . 12	
3	.1 .2 Cris .3 .4	Stock Content Creation Guidelines Crisis Response Guidelines is Response Statement Templates Internal Protocols	ed. . 10 . 10 . 12 . 13	
3 3 3 3	.1 .2 Cris .3 .4	Stock Content Creation Guidelines Error! Bookmark not define Crisis Response Guidelines is Response Statement Templates Internal Protocols Auditing your AI Input	ed. 10 10 12 13	
3 3 3 3	.1 Cris .3 .4 Al In .5	Stock Content Creation Guidelines Error! Bookmark not define Crisis Response Guidelines is Response Statement Templates Internal Protocols Auditing your Al Input nput Audit Template	ed. 10 12 13 13	
3 3 3 3	.1 Cris .3 .4 AI II .5 AI C	Stock Content Creation Guidelines	ed. 10.10.12.13.13.14.14	
3 3 3 3 3 3 4.	.1 Cris .3 .4 AI II .5 AI C	Stock Content Creation Guidelines	ed. .10 .10 .12 .13 .13 .14 .14 .14	

Definitions and Abbreviations

- **Artificial Intelligence** (AI)
- **European Union** (EU)
- European Union Artificial Intelligence Act (AI Act): Legislation regulating the use and supply of AI systems in the EU
- Al system: A machine-based system designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. Also referred to as 'Al tool' in this document
- Al Provider: A natural or legal person, public authority, agency or other body that develops an Al system or a general-purpose Al model or that has an Al system, or a general-purpose Al model developed and places it on the market or puts the Al system into service under its own name or trademark, whether for payment or free of charge
- AI Deployer: A natural or legal person, public authority, agency or other body using an AI system under its authority except where the AI system is used in the course of a personal non-professional activity
- Conformity Assessment Bodies: A body that performs third-party conformity assessment activities, including testing, certification and inspection (to ensure high-risk AI systems meet their obligations under Chapter 3 of the EU AI Act)
- **Equality Bodies (EBs):** European Public institutions that assist victims of discrimination, monitor and report on discrimination issues, and promote equality
- Equinet: The European Network of Equality Bodies
- General-Purpose AI Model: An AI model (including models trained with a large amount of data using self-supervision at scale), that displays significant generality and is capable of competently performing a wide range of distinct tasks regardless of the way the model is placed on the market, and that can be integrated into a variety of downstream systems or applications, except AI models that are used for research, development or prototyping activities before they are placed on the market
- General-purpose AI system: An AI system capable of serving a variety of purposes, both for direct use as well as for integration in other AI systems. They may be used as high-risk AI systems or may be a component of other high-risk AI systems
- Generative AI: Artificial intelligence systems that create new content (e.g. text, image, audio, or video) in response to prompts, based on the data the models have been trained on

- High-Risk AI System: AI systems used in products within the EU's product safety legislation and AI systems used in: Management and operation of critical infrastructure; Education and vocational training; Employment, worker management and access to self-employment; Access to and enjoyment of essential private services and public services and benefits; Law enforcement; Migration, asylum and border control management; and Assistance in legal interpretation and application of the law
- **Predictive AI:** AI systems that can generate outputs such as recommendations, or decisions that can influence physical or virtual environments
- **Notifying Authority:** The national authority responsible for setting up and carrying out the necessary procedures for the assessment, designation and notification of conformity assessment bodies and for their monitoring
- **Victims:** Individuals who have witnessed unfair treatment, and/or been directly subjected to unfair treatment (discrimination)

Sources

- EU AI Act: First regulation on Artificial Intelligence
- Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024
- <u>"AI, data governance and privacy: Synergies and areas of international co-operation", OECD</u> Artificial Intelligence Papers, No. 22
- <u>European Parliament Briefing on Artificial Intelligence Act (September 2024)</u>
- Equinet: About Us

Overview

This document presents guidelines for using Artificial Intelligence (AI) systems in communications processes undertaken by Equality Bodies (EBs). In this Framework, yellow tables present recommended procedures and requirements. These recommendations prioritise compliance with the European Union's AI Act (AIA). Blue tables present templates to complement written text used in communication materials or outputs.

It is advised that all individuals and offices using (or planning to use) AI systems consider this Framework when planning or executing decisions that require responsible AI use.

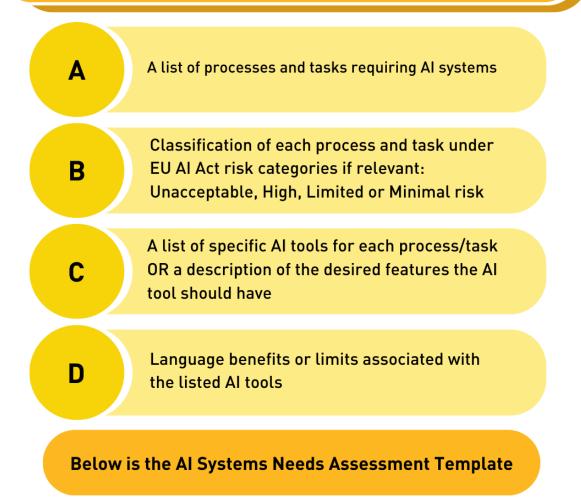
Due to the constantly changing nature of AI systems and policy interventions worldwide, this framework adopts a futureproofing, technology-neutral approach. It enables Equality Bodies to develop standardised communication strategies for anticipating, preparing for and minimising risks in AI outputs, regardless of which AI systems are procured. Communications experts in Equality Bodies are therefore encouraged to adapt the recommendations in this document to their unique operating environments.



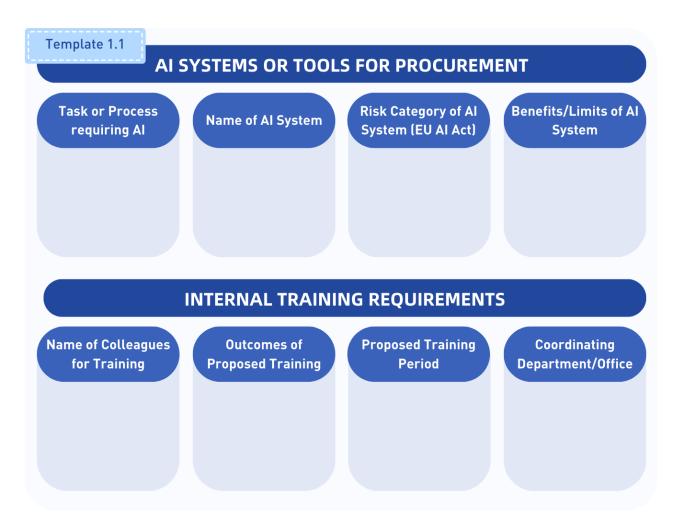
1. Needs Assessment

NEEDS ASSESSMENT

To determine which AI System are required for communications functions, the following procedures are recommended:

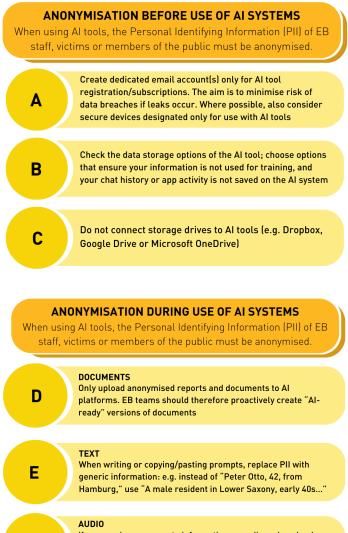


1.1 Your AI Needs Assessment Template



2. Ethics and Responsible Use of AI in Communication

2.1 Anonymisation



If you receive or generate information as audio, only upload anonymised, transcribed versions of the audio on AI platforms.

*Note that virtual meeting software where audio is automatically recorded, summarised and transcribed may also require anonymisation of sensitive information before further use on AI tools.

VICTIM/CLIENT AUDIO

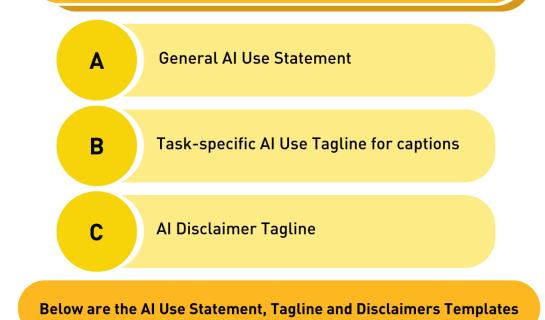
F

If audio files come from victims of discrimination, EB staff should create a second, new audio file that anonymises the voice and information of the victim and use that version for AI tasks (e.g. to generate a podcast). Victims' voices should never be uploaded on any AI platform.

2.2 Transparency and Exposure

TRANSPARENCY AND EXPOSURE

To support EBs in achieving standards of transparency and protect Equality Bodies' offices from potential exposure to AI system-based risks, the following measures are recommended



AI Use Statement, Tagline and Disclaimers Templates

Template 2.3	
	AI STATEMENTS
Al Use Statement* (General announcement) *At the discretion of each EB, a Disclaimer Statement may be added after the general Al Use Statement.	The [EB Name/Department/Team] uses AI for [list purposes] and discloses this by using clear captions and labels attached to each task or process. Example: "We do not use AI without human oversight. We do not input confidential and sensitive information into any AI tool and only use AI tools/systems that comply with EU GDPR regulations. Therefore, in submitting your discrimination claims to us, please be assured that we do not use AI for any of: [list sensitive in-house processes where AI use is banned]. To learn more about how we use AI and audit our oversight processes, contact [add details]"
Al Use Tagline* (To be amended for specific tasks or content types) *At the discretion of each EB, a Disclaimer Statement may be added after the Al Use Tagline.	 To [name of task], [type of AI software] was used. All [sensitive aspects of content output] are fact-based, fact-checked and production tasks were undertaken by us. If you have any questions or feedback, contact us on: [add details]. Examples: "To provide information about your rights in your language, this caption was ethically translated using artificial intelligence. All pictures were taken by humans, all quotes are genuine, and all individuals were also interviewed by our team. If you have any questions on our ethical translation process, or feedback, contact us on" "To provide information in more accessible formats, this podcast was made with GDPR-compliant audio generation software. All quotes are genuine, as all individuals cited were interviewed by our team. For more details and to view our Al policy, contact" "Voice generation software was used only to protect victims' identities. All words, names and dates are fact-based and fact-checked, through human oversight by the Office of the Public Defender."
Disclaimer Statement (General or task-based use)	"All artificial Intelligence service providers used by [EB name] are vetted for compliance with the General Data Protection Regulation, the EU AI Act and [add name of relevant national legislation]. While we routinely monitor AI platforms directly in use, AI companies may initiate partnerships with third-party entities and sub-processors without our immediate knowledge. By engaging with our products, services and staff, you acknowledge that [EB name] assumes no liability or responsibility for the conduct or outputs of third-party sub-processors or entities beyond our designated compliance reporting periods."

2.3 Environmental and Social Impact

BOX 1 TIPS FOR RATIONING AI USE

SENTENCE LEVEL

Reduce the number of text-based prompts by typing in paragraphs, rather than single lines. Remove greetings or extra words, to limit the energy used by the tool.

Example Prompt

Pasting or typing this: "July 14 is International Non-Binary People's Day-please suggest a 5-day campaign for a national anti-Discrimination agency in Finland" is one part of a task and generates one answer. It is better to type for various aspects of the topic, so that the tool responds in one prompt, instead of three or four. Be direct, and clear.

Suggested Batch Prompting: "Suggest a 5-day International Non-Binary People's Day campaign for Finland's anti-Discrimination agency; best times to post these campaigns; add Instagram posts."

FORMAT LEVEL

Try requesting several formats in a single generative AI prompt.

Example Prompt for a PDF upload

"Summarise this into a 12-slide presentation, a podcast and suggest LinkedIn captions."

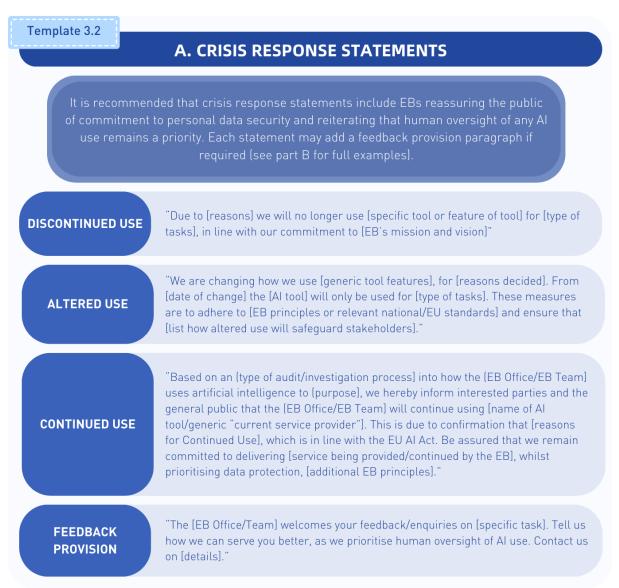
THEME-BASED LEVEL

EB Teams may create a document containing AI outputs based on the same topic. Re-using and editing the prompts will reduce the number of queries or forecast reports generated by the AI system.

3. Risk Reduction

3.1 Crisis Response Guidelines

Crisis Response Statement Templates

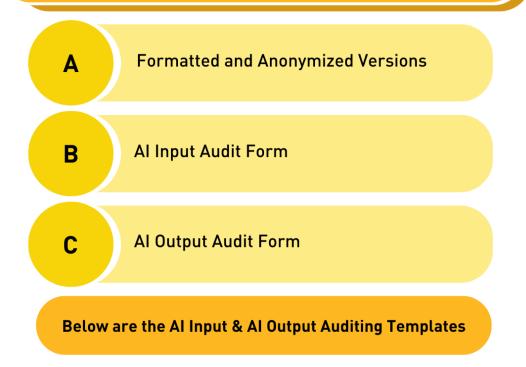


Template 3.2	. CRISIS RESPONSE STATEMENTS IN FULL
DISCONTINUED USE	"Due to data breaches beyond our jurisdictional control, the Ombudswoman of Croatia hereby discontinues all use of Findable AI for forecasting the level of harm faced by victims. This is in line with our commitment to providing stigma-free legal support and assistance to victims of discrimination."
ALTERED USE	"The Slovak National Centre for Human Rights is changing how we translate languages in our communications procedures, to further protect the identity of stakeholders, particularly whistleblowers. From January 2025, artificial intelligence/Translations AI will only be used for audio translation of extensively anonymised data. These measures will ensure maximum reach of our services in all 24 official languages of the EU and ensure that whistleblower statements remain protected in accordance with national and EU law."
CONTINUED USE	"Based on an internal/independent audit into how the Public Defender of Rights uses artificial intelligence to reduce waiting times for housing allocation emergencies, we hereby inform interested parties and the general public that the Public Defender of Rights will continue using Findable Al/our current service providers. This is due to confirmation that all sub-processors associated with the platforms under investigation have accurate reporting standards in line with the EU Al Act. Be assured that we remain committed to delivering efficient housing services for the most vulnerable in Czechia, prioritising data protection, timely service, and your human rights."
FEEDBACK PROVISION	"The Equality Council welcomes your feedback/enquiries on our use of AI in delivering this service. Tell us how we can serve you better as we prioritise human oversight of AI use. Contact us on"

3.2 Internal Protocols

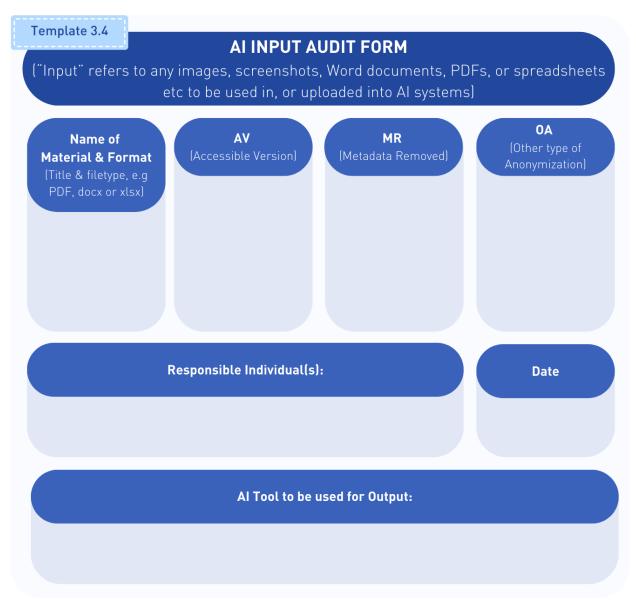
INTERNAL PROTOCOLS

To standardise the type of material used in AI systems by EBs, to enable EBs to methodically audit their use of AI the following procedures are recommended:



3.3 Auditing your Al Input

Al Input Audit Template



3.4 Auditing your Al Output

Al Output Audit Template



4. Communications

4.1 Victim Awareness Communications Strategy

BOX 2						
VICTIM AWARENESS CAMPAIGN ON AI-BASED DISCRIMINATION (EXAMPLES)						
FLOWCHART	CHECKLIST					
HAVE YOU BEEN TREATED UNFAIRLY WHILE USING AIX If you think you have been a victim of AI based discrimination duration when using the AI tool? Image: Comparison of the second and th	HAVE YOU BEEN TREATED UNFARLY WHILE USING APP Evidence can be:					
AR NAUDOJANT SU SUJUMS ELGETAS NETITIKAT DI?	Σχετε υποστεί άδικη μεταχείριση κατά τη χρήση της τεχνητής νοημοσύνης. Τα αποδεικτικά στοιχεία μπορεί να είναι:					

5. AI Tools

This section summarises the functions and potential flaws of some AI tools demonstrated and discussed in the training session on Practical and Ethical Issues Surrounding the Use of AI in Communication in May 2024.

EB experts aiming to use these tools should note that:

- The information contained in this section are suggestions;
- The AI tools listed are primarily for communications duties or tasks;
- Al tools/systems generally exhibit hallucinations and errors in output;
- Neither the Author nor Equinet are affiliated with or benefitting from the listing of these AI systems/tools;
- This information was compiled and deemed accurate as of 6 February 2025; AI system capabilities may change (improvement or otherwise), or tools may be discontinued by their deployers.

Google Gemini

RELEVANT FUNCTIONS

- Brainstorming ideas into content;
- Analysing uploaded images;
- Image generation from prompts;
- Translation across more
 languages than most AI tools;
- Summarising texts;
- Generating presentations, scripts, etc.;
- Provides multiple output choices, is recorded as exhibiting lower bias and more context;
- Connects to Google Search to allow you verify Google Gemini results in real time;
- Can be integrated with your other Gmail products (e.g. Google Drive);
- Accessible by voice prompts.

POTENTIAL RISKS

- Privacy breaches could arise when integrating Gemini with other Google workspaces (e.g. Google Drive);
- It is recommended that chat history storage is disabled, and crucial email accounts are not used for logging in.

Pop Al

RELEVANT FUNCTIONS

- Analysing PDF reports for trends;
- Explaining graphs and charts;
- Preparing presentations;
- Generating mind-maps; images, podcast scripts, press release copy, SEO headlines, captions, campaign strategy, etc;
- Supports 200+ languages.

POTENTIAL RISKS

- Integrates several other AI tools which may have varied data protection risks (check this tool's privacy options/disclosures section);
- Need for information anonymisation;
- Accessible PDFs work best;
- Images may produce hallucinations.

Murf.Al

RELEVANT FUNCTIONS

- Turning text to voiceovers in 12 European languages, with options to choose from over 100 speaker voices;
- Generating explainer videos, training courses;
- Creating documentaries, podcasts of multiple speakers with soundtracks;
- Generating videos with slideshows of pictures or stock images (for copyright purposes, it is recommended you use your own stock music and videos).

POTENTIAL RISKS

- To download outputs, you need a paid basic plan;
- Anonymisation is key, because unless you hold a paid Enterprise Account, your data may be used for voice training—check your options;
- Limited languages offered.

ChatGPT

RELEVANT FUNCTIONS

- Brainstorming ideas and complex prompts;
- Summarizing and Analysing documents;
- Generating copy for podcasts, press releases, etc;
- Image generation;
- Supports file uploads e.g. charts and excel sheets;
- Allows for voice prompts;
- Features new "Reason" option to reportedly add "deep thinking" to its responses.

POTENTIAL RISKS

 Data privacy risks:

 Edit your ChatGPT settings (under Data controls) to prevent use of your data for training;

4

 Also limit connecting other apps (e.g. Google Drive, Microsoft OneDrive) to ChatGPT.

Ideogram

RELEVANT FUNCTIONS

Image, poster and logo generation from text prompts.

POTENTIAL RISKS

- While results are relatively superior compared to other tools, generation quality is not consistent or fast on the free plan;
- Avoid using images that are similar to the likeness of existing people or similar to the work of other.

Canva

RELEVANT FUNCTIONS

- Text-to-image, text-to-video; text-to-Graphics;
- campaigns;Generate branded presentations, social media

• Create visual mock-ups for

- copy, posts and visuals;
- Batch-generation of content;
- Translation of content into various languages;
- Image, photo and audio enhancement.

POTENTIAL RISKS

 Integrates several other AI tools which may have varied data protection risks (check this tool's privacy options/disclosures section);

Ţ

 Use privacy control settings to enhance data protection measures and anonymise information where necessary.

Speechify

RELEVANT FUNCTIONS

- Scan documents and listen (enhanced accessibility);
- Video generation;
- Convert content into voiceovers and download as audio files;
- Translation;
- Transcribing of files;
- Voice cloning for batchproduction of content;
- Available in 24 European languages.

POTENTIAL RISKS

 Data privacy risks may occur; reduce these by limiting features used and stringent anonymization protocols.

Google Trends

RELEVANT FUNCTIONS

- Monitor what people are searching for online by city, region or country;
- Proactively develop campaigns using insights from your population;
- Use the "real-time" and "nonreal time" filters to narrow or broaden your search topic;
- You can also set alerts.

POTENTIAL RISKS

- Relatively safe to use as the data is anonymised and you get a general overview;
- Data on trends are not always available for all countries, or for all cities in one country.

Buffer

RELEVANT FUNCTIONS

- Repurposing your content into SEO copy for various channels;
- Analysing your social media accounts (if added) to measure audience insights and schedule posts;
- Generating reports on audience reach;
- Can be integrated with other workspaces (e.g. our Canva account, Google Drive).

POTENTIAL RISKS

- Privacy breaches could arise when integrating Buffer with your social media accounts;
- Anonymization of data and limiting exposure is recommended.

Glanos

RELEVANT FUNCTIONS

- Batch anonymization of sensitive files;
- Prediction of news trends through automated news analysis.

POTENTIAL RISKS

 Appears to have high privacy but is very expensive to acquire, compared to other Al tools.

Equinet Member Equality Bodies

ALBANIA Commissioner for the Protection from Discrimination www.kmd.al

AUSTRIA Austrian Disability Ombudsperson www.behindertenanwalt.gv.at

AUSTRIA Ombud for Equal Treatment www.gleichbehandlungsanwaltschaft.gv.at

BELGIUM Institute for the Equality of Women and Men www.igvm-iefh.belgium.be

BELGIUM Unia (Interfederal Centre for Equal Opportunities) www.unia.be

BOSNIA AND HERZEGOVINA Institution of Human Rights Ombudsman of Bosnia and Herzegovina www.ombudsmen.gov.ba

BULGARIA Commission for Protection against Discrimination www.kzd-nondiscrimination.com

CROATIA Ombudswoman of the Republic of Croatia www.ombudsman.hr

CROATIA Gender Equality Ombudsperson www.prs.hr

CROATIA Ombudsman for Persons with Disabilities www.posi.hr

CYPRUS Office of the Commissioner for Administration and the Protection of Human Rights www.ombudsman.gov.cy

CZECH REPUBLIC Public Defender of Rights www.ochrance.cz

DENMARK Danish Institute for Human Rights www.humanrights.dk

ESTONIA Gender Equality and Equal Treatment Commissioner www.volinik.ee

FINLAND Non-Discrimination Ombudsman www.syrjinta.fi

FINLAND Ombudsman for Equality www.tasa-arvo.fi



FRANCE Defender of Rights www.defenseurdesdroits.fr

GEORGIA Public Defender (Ombudsman) of Georgia www.ombudsman.ge

GERMANY Federal Anti-Discrimination Agency www.antidiskriminierungsstelle.de

GREECE Greek Ombudsman www.synigoros.gr

HUNGARY Office of the Commissioner for Fundamental Rights www.ajbh.hu

IRELAND Irish Human Rights and Equality Commission www.ihrec.ie

ITALY National Office against Racial Discrimination www.unar.it

KOSOVO* Ombudsperson Institution https://oik-rks.org/

LATVIA Ombudsman's Office of the Republic of Latvia www.tiesibsargs.lv

LITHUANIA Office of the Equal Opportunities Ombudsperson www.lygybe.lt

LUXEMBURG Centre for Equal Treatment www.cet.lu

MALTA Commission for the Rights of Persons with Disability www.crpd.org.mt

MALTA National Commission for the Promotion of Equality ncpe.gov.mt

MOLDOVA Equality Council www.egalitate.md

MONTENEGRO Protector of Human Rights and Freedoms (Ombudsman) www.ombudsman.co.me

NETHERLANDS Netherlands Institute for Human Rights www.mensenrechten.nl

NORTH MACEDONIA Commission for Prevention and Protection against Discrimination www.kszd.mk NORWAY Equality and Anti-Discrimination Ombud www.ldo.no

POLAND Commissioner for Human Rights of the Republic of Poland bip.brpo.gov.pl

PORTUGAL Commission for Citizenship and Gender Equality <u>www.cig.gov.pt</u>

PORTUGAL Commission for Equality in Labour and Employment <u>cite.gov.pt</u>

ROMANIA National Council for Combating Discrimination www.cncd.ro

SERBIA Commissioner for Protection of Equality www.ravnopravnost.gov.rs

SLOVAKIA Slovak National Centre for Human Rights www.snslp.sk

SLOVENIA Advocate of the Principle of Equality www.zagovornik.si

SPAIN Council for the Elimination of Ethnic or Racial Discrimination igualdadynodiscriminacion.igualdad.gob.es

SPAIN Institute of Women www.inmujeres.gob.es

SWEDEN Equality Ombudsman www.do.se

UKRAINE Ukrainian Parliament Commissioner for Human Rights www.ombudsman.gov.ua

UNITED KINGDOM - GREAT BRITAIN Equality and Human Rights Commission www.equalityhumanrights.com

UNITED KINGDOM - NORTHERN IRELAND Equality Commission for Northern Ireland www.equalityni.org

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

© Equinet 2024



Co-funded by the European Union

