EQUINET
European Network
of Equality Bodies

Framework

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.

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

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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

- **AI 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 'AI tool' in this document

- **AI Provider:** A natural or legal person, public authority, agency or other body that develops an AI system or a general-purpose AI model or that has an AI system, or a general-purpose AI model developed and places it on the market or puts the AI 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](#)
- ["AI, data governance and privacy: Synergies and areas of international co-operation", OECD Artificial Intelligence Papers, No. 22](#)
- [European Parliament Briefing on Artificial Intelligence Act (September 2024)](#)
- [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:

A   A list of processes and tasks requiring AI systems

B   Classification of each process and task under EU AI Act risk categories if relevant: Unacceptable, High, Limited or Minimal risk

C   A list of specific AI tools for each process/task OR a description of the desired features the AI tool should have

D   Language benefits or limits associated with the listed AI tools

Below is the AI Systems Needs Assessment Template

1.1   Your AI Needs Assessment Template

AI systems traditionally have tiered-payment plans, and generative AI typically provides single modes of output. This means a platform may only generate text responses, so Users will need to purchase a second AI tool for video. Therefore, it is recommended that:

- ☑ Equality Bodies should prioritise the use of free tiers (to save costs) and reduce risk through strategic anonymisation measures (see 2.1);

- ☑ Shared user-accounts between internal teams/offices or between partner Equality Bodies may be explored to cut costs, and provide a greater variety of AI system options;

- ☑ Price comparisons of AI tools should be periodically conducted, to maintain cost effectiveness over time.

AI Systems Needs Assessment Template

Template

AI SYSTEMS OR TOOLS FOR PROCUREMENT

Task or Process requiring AI	Name of AI System	Risk Category of AI System (EU AI Act)	Benefits/Limits of AI System

INTERNAL TRAINING REQUIREMENTS

Name of Colleagues for Training	Outcomes of Proposed Training	Proposed Training Period	Coordinating Department/Office

2. Ethics and Responsible Use of AI in Communication

AI systems generally save the data that users upload or type in. This is typically disclosed as being used to enhance user-experience and enable further training of the AI system's machine learning models. All AI tools should therefore be considered as liable to data breaches. The recommended measures for ethical and responsible use of AI systems by Equality Bodies include anonymisation; demonstrating transparency of use whilst preventing the EB's reputational exposure to AI system failure; reducing the environmental impact of the EB's use of AI systems and setting in-house standards to monitor and evaluate AI use.

2.1 Anonymisation

When using AI tools, the Personal Identifying Information (PII) of EB staff, victims or members of the public must be anonymised.

- Anonymisation is mandatory for free-tier generative AI tools, which traditionally store users' information for machine learning purposes;

- According to EU policy, PII includes personal names, driver's licence numbers, IBAN, licence plate numbers, passport numbers, phone numbers, VAT ID numbers, TAX ID numbers and National ID numbers.

ANONYMISATION BEFORE USE OF AI SYSTEMS
When using AI tools, the Personal Identifying Information (PII) of EB staff, victims or members of the public must be anonymised.

A Create dedicated email account(s) only for AI tool registration/subscriptions. The aim is to minimise risk of data breaches if leaks occur. Where possible, also consider secure devices designated only for use with AI tools

B Check the data storage options of the AI tool; choose options that ensure your information is not used for training, and your chat history or app activity is not saved on the AI system

C Do not connect storage drives to AI tools (e.g. Dropbox, Google Drive or Microsoft OneDrive)

ANONYMISATION DURING USE OF AI SYSTEMS

When using AI tools, the Personal Identifying Information (PII) of EB staff, victims or members of the public must be anonymised.

D

DOCUMENTS
Only upload anonymised reports and documents to AI platforms. EB teams should therefore proactively create "AI-ready" versions of documents

E

TEXT
When writing or copying/pasting prompts, replace PII with generic information: e.g. instead of "Peter Otto, 42, from Hamburg," use "A male resident in Lower Saxony, early 40s…"

F

AUDIO
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
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

The EU's Artificial Intelligence Act (AIA) requires transparency from creators of AI tools and systems. It specifies labelling whenever content is either generated or modified using AI. The Act also notes that larger, public-facing AI models may be susceptible to widespread risks.

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

- Create a general AI Use Statement. This should be published as: a vertical on official websites; as an FAQ section; or as a scrolling banner on the website;
- Create task-specific AI Use Tagline(s). Where necessary, publish the tagline: within designed graphics; at the end of captions for social media posts; as footnotes on official documents; within meta-data of AI-created content, or as alt-text on images;
- Create a Disclaimer Tagline. This should accurately state the boundaries of the EB's use of AI, and efforts made to reduce risks. Use of the Disclaimer Tagline should be at the discretion of EB officers;
- Avoid naming specific AI products, to prevent accusations of brand promotion or bias. Instead, clearly cite the specific functions of the AI tool system, and the reasons why it was used.

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

A General AI Use Statement

B Task-specific AI Use Tagline for captions

C AI Disclaimer Tagline

Below are the AI Use Statement, Tagline and Disclaimers Templates

AI Use Statement, Tagline and Disclaimers Templates

AI STATEMENTS

AI Use Statement* (General announcement) *At the discretion of each EB, a Disclaimer Statement may be added after the general AI 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]"
AI 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 AI 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: 1. "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..." 2. "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 AI policy, contact..." 3. "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

AI systems consume significant amounts of energy and inequalities have been widely reported about wage disparities and the mental toll faced by workers. Specific recommendations for Equality Bodies to limit the environmental and social impact of AI use are as follows:

- 🌍 Generative tasks (particularly text-based) should be divided or implemented in sets by sentence, format or theme—see Box 1 for details;

- 🌍 Image and video-based tasks should be used only as a final option—use more original content and human oversight, to reduce energy use;

- 🌍 Tasks that analyse large sets of data for trends should be done only as necessary, to reduce frequent processing and production of reports. Frequent use of AI causes more environmental impacts;

- 🌍 Large tasks should be scheduled for the cooler months of the year, to minimise data infrastructure cooling costs. Where possible, consider undertaking AI-related tasks during hours of lesser demand, e.g. overnight;

- 🌍 Limits should be set on outputs for each AI tool where possible, by using the "Settings" function of the AI tool;

- 🌍 AI responses should be upcycled for future tasks, to prevent waste. Previous outputs should be transferred into editable platforms. This also reduces intellectual property, data breach and reputational risks for the EB.

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

Several AI systems used for communication purposes are cited as having ingrained bias from training source data. Furthermore, the need to increase features within these systems also contributes to continuous changes in the sub-processor partners offering the AI-based services. For example, your favourite image generation tool may partner with text-generating AI companies to add caption features. In general, the rapidly changing state of AI development means one AI tool may swing between compliance and non-compliance with EU and GDPR guidelines at any given time. These factors therefore require Equality Bodies to minimise or eradicate the reputational risk that may come with the changing status of the AI tools they use. High-risk areas within communications practice that require proactive safeguarding are content creation tasks, crisis responses to AI use and feedback obligations to the public.

3.1   Stock Content Creation Guidelines

Often, a single AI tool may have various features being provided by different third-party developers. This multiplies the Equality Bodies' exposure to intellectual property and copyright infringement risks, AI hallucinations[1] and data breaches. Specifically, images, video and music are the main pitfalls identified for AI-based communication tasks. To minimise these risks:

- Equality Bodies should independently create stock images, video and soundtracks to be used in AI content generation;

- Stock content should prioritise protecting the identities of persons, as any content inserted into AI tools may be used for training by the AI system Provide. Images and videos may therefore be taken of body parts (with no identifying features) or of persons in profile (e.g. a picture of their shadow);

- If images or videos require showing the full identity of an individual (e.g. Equality Body staff, models or clients filing complaints), then written informed consent must be obtained;

- Consent release forms should be created for AI stock content use where needed and signed by individuals from whom content is to be obtained;

- Stock content for AI use may include images or videos of flags (e.g. national or EU flags); logos of Equality Bodies; national landmarks and famous locations; relevant institutional buildings with signs; and emblems of inclusion (e.g. LGBTQIA+ signs, disability signs onsite at toilets, etc.);

- Videos with natural ambient sound and movement should be recorded for a minimum of at least 30 seconds each, to enable use across social media platforms. Longer clips should also be included in stock content, for use on longer formats (e.g. for AI-generated podcasts);

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[1] AI hallucinations are incorrect or misleading results that AI models generate. These errors can be caused by a variety of factors, including insufficient training data, incorrect assumptions made by the model, or biases in the data used to train the model.

Equality Body Communication Experts may also create various stock content of at least five seconds each, for use as GIFs on their social media platforms;

Minimise permitting AI systems to use your Equality Bodies' original stock assets to train machine learning models. This can be achieved by finishing all communications tasks within secure/closed platforms. For example, audio translations and captions can be made using an AI tool, then the EB's stock images or video are added in a separate non-AI editing tool, to create the final desired content or output.

3.2   Crisis Response Guidelines

In the event of accidental, unintentional mistakes concerning AI use (hallucinations, data leaks, or discrimination), the following measures are recommended for reputational crisis management; Discontinued Use, Altered Use and Continued Use:

⚠ **Discontinued Use**: Relevant EB staff assess the extent of reputational damage and status of the AI system, then determine it is not fit for purpose;

⚠ **Altered Use**: EB staff determine the crisis incident was due to internal factors and decide to make internal changes;

⚠ **Continued Use**: EB staff determine that the crisis was minor, not dependent on the AI system, but based on negligible challenges and maintains usage.

While all crisis responses should be communicated internally, selected responses may be communicated externally, after the EB's evaluation of each crisis incident (see Crisis Response Statement Templates A&B below for examples).

Crisis Response Statement Templates

A. CRISIS RESPONSE STATEMENTS

It is recommended that crisis response statements include EBs reassuring the public of commitment to personal data security and reiterating that human oversight of any AI use remains a priority. Each statement may add a feedback provision paragraph if required (see part B for full examples).

DISCONTINUED USE

"Due to [reasons] we will no longer use [specific tool or feature of tool] for [type of tasks], in line with our commitment to [EB's mission and vision]"

ALTERED USE

"We are changing how we use [generic tool features], for [reasons decided]. From [date of change] the [AI tool] will only be used for [type of tasks]. These measures are to adhere to [EB principles or relevant national/EU standards] and ensure that [list how altered use will safeguard stakeholders]."

CONTINUED USE

"Based on an [type of audit/investigation process] into how the [EB Office/EB Team] uses artificial intelligence to [purpose], we hereby inform interested parties and the general public that the [EB Office/EB Team] will continue using [name of AI tool/generic "current service provider"]. This is due to confirmation that [reasons for Continued Use], which is in line with the EU AI Act. Be assured that we remain committed to delivering [service being provided/continued by the EB], whilst prioritising data protection, [additional EB principles]."

FEEDBACK PROVISION

"The [EB Office/Team] welcomes your feedback/enquiries on [specific task]. Tell us how we can serve you better, as we prioritise human oversight of AI use. Contact us on [details]."

B. 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 AI/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 AI 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..."

3.3   Internal Protocols

This section discusses internal measures for standardising the type of material used by Equality Bodies in AI systems. The aim is to enable Equality Bodies to methodically audit their use of AI.

Documents, meeting minutes, audio or visual assets belonging to Equality Bodies will often be partially or fully written/uploaded onto AI tools/systems. Equality Bodies are therefore encouraged to adopt the following additional standards when using AI for tasks with high reputational risk:

- ✅ Accessible (plain, easy-to-read text) versions of PDFs should be developed at initial production. These versions are less prone to hallucinations from AI tools, whilst being compatible with machine learning systems. AI-friendly documents should have no images but may include tables or graphs with clearly labelled axes;

- ✅ To enhance output (e.g. summaries) from AI systems, EB documents should be formatted: text-heavy documents should have bold headings; relevant paragraphs should be made into bullet points with subheadings, or changed into Question-and-Answer segments;

- ✅ Formatting may also include translating documents and text during production, as most AI tools are trained on/generate responses in English, or some European languages;

- ✅ Before uploading, always anonymize or remove sensitive metadata from files (images, screenshots, Word documents, PDFs, spreadsheets, etc);

- ✅ Sensitive metadata includes details such as comments or thumbnails in the file; names of document author(s), details on the device used to create the file and the location of where the content was created.

Equality Bodies aiming to start an internal protocol for documenting standards in AI Use should consider the AI Input Audit Form and AI Output Audit Form provided (see Templates below).

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:

A — Formatted and Anonymized Versions

B — AI Input Audit Form

C — AI Output Audit Form

Below are the AI Input & AI Output Auditing Templates
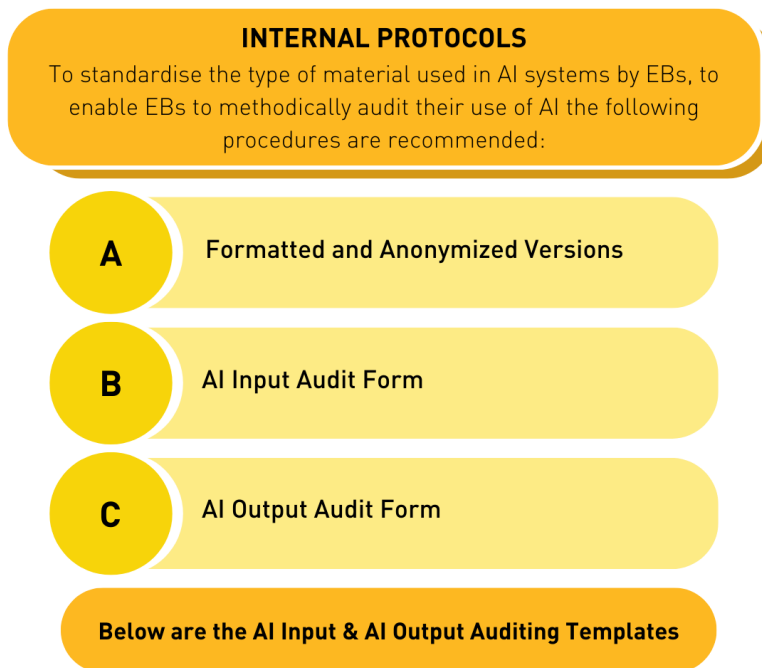
3.4   Auditing your AI Input

Audits of any input material being prepared for insertion into AI tools use may have the following labelling conventions:

- Where accessible versions of documents have been created for input into AI tools, these should be named as AV (Accessible Version);

- When EXIF and other sensitive metadata is removed from input material, these should be named as MR (Metadata Removed);

- If other methods of anonymization are used apart from metadata removal, (e.g. in-text formatting), then these measures should be labelled as OA (Other type of Anonymization).

AI Input Audit Template

Template

AI INPUT AUDIT FORM
("Input" refers to any images, screenshots, Word documents, PDFs, or spreadsheets etc to be used in, or uploaded into AI systems)

Name of Material & Format (Title & filetype, e.g PDF, docx or xlsx)	AV (Accessible Version)	MR (Metadata Removed)	OA (Other type of Anonymization)

Responsible Individual(s):

Date

AI Tool to be used for Output:

3.5   Auditing your AI Output

Materials resulting from use of AI tools (e.g. any designs, text, presentations, translations, summaries, forecast reports or prompts created with AI) should be audited for hallucinations (errors) and to assess the extent of human oversight required from EB staff.

The following protocol is advised:

- When hallucinations are factually incorrect, these should be labelled FH (Fact-based Hallucination). For example, incorrect statistics from a chatbot, wrong flag colours from an image generator are all FHs;

- If the hallucinations are factually correct but show clear bias and discrimination, these should be labelled DH (Discriminatory Hallucination). For example, an AI tool showing only wheelchair users as people living with disabilities or a tool that repeatedly generates only one gender or race despite several prompts, is exhibiting discrimination. AI tools that only cite sources from one political leaning, one religion or region, are tools that show bias.

Whenever EB staff members check the output from AI tools, human oversight has occurred. These oversight functions may be audited as follows:

- When human oversight requires quick corroboration (e.g. online searches from a few official sources), this should be labelled as MO (Minimal Oversight);

- When human oversight extends to multiple sources for corroboration (e.g. various websites and desk research), the effort should be labelled as Significant Oversight (SO);

- If human oversight requires multiple sources and includes offline checks (e.g. phone calls, referring the output to others outside the EB staff's immediate environment) then this should be labelled EO (Extensive Oversight);

- Time spent on human oversight functions should also be recorded (see 3.6 for a template). Equality Bodies may add the monetary (wage-based) cost of oversight time expended, if audits include the cost effectiveness of specific AI systems.

AI Output Audit Template

AI OUTPUT AUDIT FORM
("Output" refers to any designs, text, presentations, translations, summaries, forecast reports or prompts created using AI systems)

AI Tool Used:

Time Start:

Time End:

Task Name
(What the AI tool was used for)

Type of Oversight Required
(Human supervision of AI task)
MO/SO/EO*

Type of Hallucinations
(Mistakes made by AI tool)
FH or DH**

Total Time Spent on Task:

Environmental/Ethical Measures taken; if any:
(E.g. batch-preparation or recycling of prompts, etc)

Responsible Individual(s) & Date:

*Outline human supervision, cross-checking, etc., and categorise each in brackets as Minimal Oversight (MO), Significant Oversight (SO) or Extensive Oversight (EO).
**Outline any errors and categorise each in brackets as: Fact-based (FH) or Discriminatory (DH) Hallucinations.

4. Communications

This section assists Equality Bodies to initiate AI-focused corporate social responsibility measures for three main stakeholders: victims of discrimination, public service entities and corporate organisations using AI systems. It starts with a summary of the links between AI systems and discrimination. Research from the Council of Europe (2018)[2] lists two types of AI-driven discrimination: direct and indirect.

⚖ Direct discrimination is AI-driven discrimination based on legally recognised and protected characteristics–e.g. Disability, age, gender, etc.;

⚖ Indirect discrimination occurs when AI systems invent new characteristics that are not legally recognised or protected (i.e. neutral) but can still result in discrimination. For example, AI-driven price discrimination may make a person/group of persons pay higher costs for a service, compared to others;

⚖ Indirect discrimination has a higher burden of proof, as it may be invisible, unintentional or argued as being unavoidable by the creator (Provider) or corporate user (Deployer) of the AI System. The EB communication expert's goal should be educating stakeholders that: such complaints require victims and investigators to determine if/how indirect discrimination occurred, and whether it was intentional;

⚖ Victims generally assist the EB by providing evidence and assessing if the AI system provides essential public or private services. The evidence gathered then shows whether the discrimination was intentional, or not;

⚖ AI systems are typically based on various technological or business service providers (e.g. sub-processors, developers or retailers) that deliver products and services to various entities (e.g. private organisations, employers, law enforcement, medical authorities or civil service offices). Therefore, awareness campaigns should assist victims to identify parties connected to acts of discrimination (see 4.1), and assist corporate bodies and public service providers (or their proxies) in maintaining non-discriminatory AI systems).

4.1   Victim Awareness Communications Strategy

EB communication campaigns should prioritise educating the public on:

📖 The types of AI discrimination;

📖 How to determine if the AI system involved provides an essential service;

📖 Identifying other parties that may have contributed to the reported discrimination;

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[2] Zuiderveen Borgesius, F. (2018). Discrimination, artificial intelligence, and algorithmic decision-making. Council of Europe, Directorate General of Democracy.

📖 How to submit legally admissible forms of evidence (see Box 2 for example of a Flowchart that may be used in a communications campaign).

EB case-based questions should also be integrated into communication strategies as graphics, short-form videos, etc. (also see Box 2 for example of a Checklist that may be used in awareness campaigns).

BOX 2

VICTIM AWARENESS CAMPAIGN ON AI-BASED DISCRIMINATION (EXAMPLES)

FLOWCHART	CHECKLIST

5. Evaluation of External Engagement

The effectiveness of external communication campaigns on AI-driven discrimination should be evaluated. The following metrics are recommended for assessing the EB's engagement with the public, victims, and private/public service providers:

- Number of Downloads (of relevant EB material);

- Number of written Feedback/Complaints on EB's AI-produced material;

- Number of written Feedback/Complaints on EB's AI-discrimination awareness campaigns;

- Number/Types of Unique Victim Complaints Filed (after direct/indirect engagement with the EB's communications material);

- Number/Types of Verified Follow-Ups (AI-related feedback from Audiences, AI Providers or Deployers);

- Audience Reactions and Votes (non-written feedback such as likes, thumbs-downs, smiling emojis, etc. on social media posts);

- Number of Attendees at the EB's Engagement Sessions (panels, trainings, etc);

- Feedback from AI System Providers and Deployers (on EB awareness campaigns).

6. Peer-based Exchanges: Equality Body Protocol

As a member of Equinet, all Equality Bodies automatically collaborate with each other at continent-level, through Equinet's Communication Practices & Strategies Working Group, and the AI Working Group.

At peer-level, the following areas of exchange may be embarked on, to boost efficiency and enhance the impact of Equality Bodies' communication and case processing strategies:

- **AI System Review Notes**: EB Communications Experts may exchange feedback on AI systems for cost effectiveness, language output, privacy etc., to encourage best practices and prudent procurement within the network;

- **Exchange on AI-driven Complaint Outcomes**: Here, EB Communication Experts may share commentary on their contributions to cases of AI-driven discrimination. Commentary may be formal or informal in tone and must be anonymized or paraphrased for data protection purposes;

- **AI Communication Projects**: Examples of AI system outputs (graphics, prompt examples, etc) may be shared, to compare experiences of effective communication strategies and assist peers with engagement campaign ideas;

- **Knowledge exchange through uploading of AI Audit Reports**: These may be anonymized or summarised if/where applicable, before being uploaded.

7. 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;

- AI 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 AI

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.AI

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;
  - 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;
- Create visual mock-ups for campaigns;
- Generate branded presentations, social media 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);
- 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 batch-production 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 "non-real 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 AI 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
www.cig.gov.pt

PORTUGAL
Commission for Equality in Labour and Employment
cite.gov.pt

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.

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Co-funded by the European Union