

Integrated Impact Assessment – Summary Report

1. Title of proposal

Adoption and Approval of the Generative AI Policy within the City of Edinburgh Council

2. What will change as a result of this proposal?

Generative Artificial Intelligence tools are becoming increasingly accessible and are already being used, formally and informally, across many public sector organisations, including UK and Scottish Governments and neighbouring authorities.

Without a clear policy framework, there is a risk of inconsistent practice, legal non-compliance, ethical and sustainability concerns, and unintended harm to citizens, and staff.

This policy is required to ensure that the use of Generative AI within the Council:

1. Supports service improvement and efficiency while maintaining human judgement (Human in the Loop), as outlined in service efficiency and improvement pilots such as Magic Notes within the Health and Social Care partnership
2. Complies with statutory duties including equality, human rights, data protection and applicable cyber security standards
3. Maintains staff and public trust through transparency and accountability
4. Aligns with Scottish Government policy, the Council's digital and smart city strategy.

It should be noted that the use of Generative AI within the Council will be overseen through the Data Ethics Governance Board.

A draft Terms of Reference (TOR) has been developed for this board, setting out how Generative AI will be governed, managed and monitored, including the controls that will apply.

The Generative AI policy does not introduce new AI services. Instead, it acts as a guide for staff, setting out the standards and requirements **they must** follow when considering or using Generative AI within the Council

Each new Generative AI use case will be required to have the right governance in place before it is introduced. This will include completing Integrated Impact Assessments, Data Protection Impact Assessments (DPIAs), and appropriate security assurance documentation, in line with Council requirements.

3. Briefly describe public involvement in this proposal to date and planned

No public involvement to date and none planned as this is an Internal Governance Policy

4. Is the proposal considered strategic under the Fairer Scotland Duty?

The socio-economic impacts have been considered, and information detailed within this IIA.

4. Date of IIA

February 2026

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title	Date of IIA training
Roddy Bremner	Customer Contact Team Manager - facilitator	5/11/2019
Mike Brown	Cyber Security Manager – Report Writer	N/A
Heather Robb	Chief Digital Officer – Lead Officer & Main Stakeholder	N/A
Kevin Wilbraham	Information Governance and Data Protection Manager	N/A

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need – where available use disaggregated data		Whilst there is very little data published around this, in general AI can provide low-cost access to public information across many sectors including health and education, especially improving reach for more underserved and digitally excluded communities. As outlined by demonstrations by our Education and Health and Social Care colleagues, the use of AI, and how this benefits pupils and citizens who currently receive often complex and varied care and educational needs.
Data on service uptake/access	<p>Renfrewshire Council AI Case Study</p> <p>Care Connect AI - Developing an AI-Powered 'No Wrong Door Chatbot' for Scottish Social Services - DigitalNation.scot</p>	<p>AI assistants provide 24/7 responses, reducing waiting times and improving access. Renfrewshire’s “Millie” already handles high enquiry volumes outside office hours, see link opposite for further details</p> <p>Conversational support increases engagement and ease of access, including for people who struggle with phone or web forms. Projects like Care Connect AI aim to offer a simple “no wrong door” route to support.</p> <p>Automating routine enquiries frees staff to focus on complex, high-need cases, improving service quality and capacity and citizen engagement</p> <p>AI helps identify service-use patterns and gaps, enabling</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		data-driven redesign under structured, secure governance.
Data on equality outcomes	<p>https://www.gov.uk/data-ethics-guidance/artificial-intelligence-in-public-services</p> <p> Digital Office Scottish Local Government</p> <p>Artificial intelligence in public services - GOV.UK</p> <p>Artificial Intelligence (AI) Resources and Guidance Scottish AI Playbook</p>	<p>Bias and inequality risk</p> <p>AI systems trained on existing public sector data can reproduce or amplify historical biases. If the source data reflects disparities (e.g., under-representation of certain ethnic or protected groups), AI may produce outputs that worsen unequal outcomes or misinform decision-making. This is a recognised risk in public service use of AI. This will however be monitored and governed by the AI Data Ethics Governance Board through individual IIA's for each use case, and to ensure there is always a human in the loop.</p> <p>Data quality matters for fairness</p> <p>The accuracy of AI predictions and assessments depends heavily on the representativeness and quality of equality and demographic data.</p> <p>Poor-quality or incomplete data can lead to incorrect inferences, undermining monitoring of equality outcomes and potentially masking inequalities that require intervention.</p> <p>Legal and regulatory requirements</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Public Sector Equality Duty: specific duties in Scotland EHRC</p>	<p>City of Edinburgh Council must meet the <i>Public Sector Equality Duty</i> (PSED) under the UK Equality Act when using AI in ways that affect individuals or groups.</p> <p>Failing to consider equality impacts in AI deployment can lead to discrimination risks and legal challenges.</p> <p>Necessity of oversight and mitigation</p> <p>Ethical and governance frameworks, such as the <i>Scottish AI Playbook</i> and equality guidance by the Equality and Human Rights Commission, emphasise ongoing monitoring, transparency and impact assessment to ensure AI supports rather than undermines equality outcomes. Again - This will however be monitored and governed by the AI Data Ethics Governance Board through individual IIA's for each use case, and to ensure there is always a human in the loop</p>
Research/literature evidence	<p>Transforming Local Government: How Fife Council and CGI Are Using AI to Build Smarter Services</p> <p>Renfrewshire Council AI Case Study</p>	Some case studies / links to use of AI in Local Authorities is transforming public sector in Scotland

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Socio-Economic	<p>Artificial Intelligence (AI) Resources and Guidance Scottish AI Playbook</p> <p>More than 3,400 jobs and targeted support for local communities to help tackle the cost of living as Lanarkshire named latest AI Growth Zone - GOV.UK</p> <p>Box: AI technologies: Adoption by Scottish businesses and potential influence on the economic outlook - Scottish economic bulletin: December 2025 - gov.scot</p> <p>Productivity boost from Generative AI could add £31 billion of GDP to the UK economy</p>	See detailed information published by the Scottish Government on the Adoption of AI Technologies
Public/patient/client experience information	<p>Renfrewshire Council AI Case Study</p> <p>Edinburgh social workers used AI for reports with council leader calling trial "a success"</p>	<p>2 cases studies, 1 carried out in Edinburgh in the use of Magic Notes.</p> <p>Magin Notes is an AI-powered, web application, developed by Beam, designed for social workers and frontline staff to record, transcribe, and summarise client conversations, allowing Health and Social Care staff to focus on care provision rather than note-taking.</p>
Evidence of inclusive engagement of people who use the	<p>Edinburgh social workers used AI for reports with council</p>	Whilst the wholesale use of Generative AI has not been used within Edinburgh, a

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service and involvement findings	leader calling trial "a success"	number of pilot projects such as Magic Notes in Health and Social Care, and Co-Pilot in Education have both delivered positive outcomes for our citizens and learners alike, and they have expressed a wish to build on these pilots with further adoption of AI throughout the Council.
Evidence of unmet need	AI: Consultation on the use of artificial intelligence in government Local Government Association	<p>Ongoing shortages in digital and AI skills could limit the council's ability to adopt and scale AI effectively, in addition to this, wage structures may mean talent be drawn to private sector rather than public sector.</p> <p>Funding and resource constraints - could prevent investment in AI infrastructure, training, and long-term development, making it hard to move beyond proof of concepts or fund significant transformational AI projects within the Council</p> <p>Poor data quality, fragmented systems, and legacy platforms may hinder AI readiness within the council and increase implementation complexity and cost potential impacts.</p>
Good practice guidelines	NCSC AI and cyber security: what you need to know NCSC Secure AI system development	See links opposite for some of the good practice guidelines published by UK Gov and their respective agencies the procurement and onboarding

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	ICO Artificial intelligence ICO25 National AI Strategy Scottish AI Strategy Open AI Safety Best Practices Understanding artificial intelligence ethics and safety - GOV.UK	<p>These are also clearly outlined in the draft Generative AI Policy v1.5</p>
Carbon emissions generated/reduced data	What is the climate impact of Artificial Intelligence? — Scottish AI Alliance	<p>Estimates suggest the training of LLM’s (Large Language Models) can emit significant volumes of CO2 into our environment. Estimates on the carbon footprint of AI models may vary, as some providers lack transparency, as outlined in the Generative AI policy.</p> <p>Staff will be encouraged and trained to use any form of Gen AI in the Council responsible and will only be used where approved.</p> <p>The Council where possible will commit to using only sustainable cloud services and can provide evidence in their use of energy efficient AI tools and hosted infrastructure</p>
Environmental data	What is the climate impact of Artificial Intelligence? — Scottish AI Alliance	<p>Estimates suggest the training of LLM’s (Large Language Models) can emit significant volumes of CO2 into our environment. Estimates on the carbon footprint of AI models may vary, as some providers</p>

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		<p>lack transparency, as outlined in the Generative AI policy. The Council have pledged that the use of AI is proportionate, responsibility with environmental sustainability principles.</p> <p>Staff will be encouraged and trained to use any form of Gen AI in the Council responsible and will only be used where approved.</p> <p>The Council where possible will commit to using only sustainable cloud services and can provide evidence in their use of energy efficient AI tools and hosted infrastructure</p>
Risk from cumulative impacts	See Policy.	<p>The risks of cumulative impact of Gen AI within the Council isn't just one risk in isolation it is the combined effect of but not limited to.</p> <p>Data and Privacy Issues Cyber Security Vulnerabilities Misinformation Governance Gaps Bias and Unfairness</p> <p>The Council will adopt and already have in place strong governance controls, to reduce the risk of these risks materialising, whether that be individually or cumulatively.</p> <p>Governance is outlined in the Policy and further defined in the TOR for the AI Data Ethics Governance Board.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Other (please specify)	N/A	N/A
Additional evidence required	N/A	N/A

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights and Children’s Rights	Affected populations
<p>Positive</p> <p>Positive examples could include Improved accessibility (e.g. translation, text-to-speech, simplified information for disabled people and minority language users.</p> <p>More consistent handling of routine administrative tasks, reducing individual decision-maker variability</p>	<p>People with Protected Characteristics Children and Young People Vulnerable Adults General Public Council Staff Disabled</p>
<p>Negative</p> <p>Negative examples could include the risk of bias reinforcing discrimination against protected groups if training data is biased.</p> <p>Digital exclusion for people with limited access to technology or low digital skills.</p>	<p>People with Protected Characteristics Children and Young People Vulnerable Adults General Public Council Staff Disabled</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive</p> <p>AI could support the Council by improving workflow efficiency, such as optimising route planning for Waste Collection and Home Help Services, thereby reducing unnecessary travel and associated carbon emissions.</p> <p>Generative AI could also improve the analysis of environmental data (e.g., emissions, land use, flood risk, biodiversity) more quickly and at scale than traditional methods.</p>	<p>All</p>
<p>Negative</p> <p>It is well understood that the training and operation of Generative AI models, require significant electricity and</p>	<p>All</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>can increase greenhouse gas emissions where energy supplies are not fully renewable.</p> <p>In addition, the data centres that host AI services have high energy and water demands, particularly for cooling, which may increase local emissions where low-carbon infrastructure is not used.</p> <p>As noted in the policy – “The Council will prioritise cloud and AI providers that can demonstrate progress in reducing carbon emissions, improving data-centre efficiency, responsible water management, and increasing the use of renewable energy, and whose sustainability commitments align with the Council’s”</p>	

Economic	
<p>Positive</p> <p>Refer to Section 7 Links provided under Socio-Economic</p>	
Negative	

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?

In line with the Council’s commitment to responsible innovation and robust governance, all proposals to use artificial intelligence whether by Council officers or by Contractors must be submitted to the AI Data Ethics and Governance Board for approval.

Service Areas are required to complete an Integrated Impact Assessment (IIA) as part of this process.

The IIA will assess potential ethical, legal, social, and environmental impacts, alongside data protection, security and equality considerations.

The Board will review and oversee these assessments to ensure risks are identified and mitigated, and that AI solutions align with the Council's values and statutory obligations prior to implementation.

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

Young children: Schools will develop and implement their own policies governing the use of AI within educational settings. Where possible, these policies will align with the Council's Corporate AI policy, while allowing for the specific needs and responsibilities of schools.

Young people and supported employees: This includes employees classified as young people, such as Modern Apprentices, JET Programme students, Project SEARCH interns, as well as employees with sensory or speech impairments, learning difficulties, low levels of literacy or numeracy, or for whom English is a second language.

Communication and guidance for these groups will be delivered through existing channels, including ORB, Newsbeat, email, and the Council website, alongside tailored engagement and support from line managers. This will support awareness, understanding, and the safe and secure use of Generative AI

11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.

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12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

N/A

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Data and Ethics Governance Board will be responsible for ensuring all governance is in place when adopting Gen AI within the Council,	Chair of Data Ethics Board		1 year from

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

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15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

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16. Sign off by Head of Service

Name Nicola Harvey

Date 17th February 2026

17. Publication

Completed and signed IIAs should be sent to:

integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care
sarah.bryson@edinburgh.gov.uk to be published at
www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/