Equality Impact Assessment: Use of generative artificial intelligence by learners

Summary

Name of policy or practice	Use of generative artificial intelligence by learners when completing assessment tasks — updated position
New policy or revision	Revision
Policy owner (role)	Digital learning development manager, digital assessment services
Date policy owner confirmed completion	July 2025
Agreed schedule review date	July 2026
Additional review date (Action review date)	

Action plan

This section is completed at the end of the Equality Impact Assessment. Due to the importance of embedding equality in SQA through our actions the action plan will be the focus and record of ongoing actions.

Explain how you will monitor and record the actual impact on equality groups, including how the evidence can be revisited to measure the actual impact.

Required actions	Owner	Date	Comment and review
Continuation of the External AI and Emergent Technologies Group. This group is made up of internal colleagues who use their knowledge, experience and contacts to keep up with the latest developments in AI and their implications for the education sector. The group will meet to pool its knowledge of the impacts of Gen AI use on qualifications and assessments to contribute towards evidence-based decision making.	Digital learning development manager (group chair)	Meets monthly	Two prominent colleagues from the Policy, Analysis and Standards directorate are members of the External AI and Emergent Technologies Group who are acutely aware of equalities issues
Continuation of the Internal AI Working Group looking at internal issues related to AI and how we need to change as an organisation to embrace it. The group will meet to pool its knowledge of the impacts of Gen AI use on SQA procedures to contribute towards evidence-based decision making.	Head of corporate office (group chair)	Meets monthly	EqIA manager attends this meeting
Continue to engage with practitioners and learners on the subject of Gen AI in education. Gather views and attitudes and be alert to shifts that may have an impact on future positions regarding Gen AI, which will be based on evidence.	Senior researcher (lead researcher)	Ad hoc throughout the year	Through surveys and focus groups

Identified actions	General equality duty	Owner	Date	Comment and review
Include hyperlinks to key resources in the exemplification document (this accompanies the updated position statement on the use of Gen AI). Ensure these resources cover the flaws within the technology, such as perpetuating harmful stereotypes and bias.	Advance equal opportunities and foster good relations	Digital learning development manager	June 2025	Complete. Inserted numerous links, most of which have sections on bias and ethics.
We can speak directly with practitioners about this position in Autumn 2025. When this happens, we will ensure we cover the flaws within the technology, such as perpetuating harmful stereotypes and bias. We will also ask practitioners about any equality impacts they have noticed.	Advance equal opportunities and foster good relations	Digital learning development manager	September 2025	
SQA Research and Evaluation Team will consider how to learn the views of care-experienced learners in future rounds of consultation and engagement with learners on the issue of Gen AI.	Eliminate unlawful discrimination	Senior researcher (lead researcher)	Ongoing	

Policy aims

What is the rationale for this policy or practice?

The purpose of this position is to help learners and practitioners make informed decisions about the use of generative artificial intelligence (Gen AI), specifically in assessment contexts. Learners and practitioners may, of course, wish to make use of Gen AI tools in their wider learning and teaching activities. However, these classroom practices fall outside the scope of this stance, as SQA's remit is limited to the assessment and awarding of qualifications and does not extend to learning and teaching.

Rapid advances in Gen AI technologies offer opportunities for education and assessment. Together with our partners in the education sector, we continue to explore those opportunities and seek ways to overcome potential challenges. SQA has an ongoing programme of consultation and engagement, including various events, surveys and focus groups, to continue to develop our understanding of the impact of Gen AI on learning and teaching, and the implications for assessment. Through this work, we have seen many examples of Gen AI's potential across the education sector. However, at present, several concerns remain about the potential for misuse of Gen AI in assessment contexts. It is important that we embrace emergent technologies responsibly to support learners and practitioners, while maintaining the integrity of SQA qualifications and ensuring equity, transparency and fairness.

The use of Gen AI tools or functionality is only considered acceptable when it does not compromise or attempt to compromise the integrity of SQA course assessments or certification.

What evidence is there to support the implementation or development of this policy or practice?

The emergence of Gen AI tools is transforming the education sector. The initial SQA position, published in August 2023, was written at a time where the sector's focus was on preventing learner malpractice and protecting learners from the risks of data 'hallucinations' or biases that can occur when using Gen AI. While these remain important issues, the focus is changing. Education centres and staff, parents and learners themselves are finding Gen AI embedded in tools they use in their daily lives. Concern has shifted towards educating learners, for example by helping them understand how to use Gen AI responsibly and ethically, and by raising awareness that inherent biases in data can lead to the generation of incorrect information.

It became clear from responses to [our first survey on Gen AI](#) issued to teaching practitioners in 2024 that some organisations believed SQA's initial position on Gen AI represented an outright ban on its use (one respondent stated that access to AI apps was prohibited in all schools in their local authority area). In fact, we recognise that an outright ban on the use of Gen AI is potentially harmful to learners who rely on assistive technology to access learning and teaching. Furthermore, it is not practicable to enforce (or expect practitioners to enforce) a ban on technology that is so easily accessible and cannot be controlled by SQA. Therefore, the emphasis should be on educating learners. This also has the benefit of preparing learners for further study or employment in a world where Gen AI use will be commonplace.

We stated in 2023 that we would revisit our position once we had further information to support evidence-based decision making. Our current position reflects the additional evidence we have reviewed, and identifies potential acceptable uses of Gen AI in assessment. Another change from our initial position is the specific reference to assistive technology.

Colleges and universities issue guidance for their learners on the use of Gen AI. They update their guidance regularly, and the tone has shifted over time, moving away from trying to prohibit the use of Gen AI. For example, the University of Glasgow's Info for Students on artificial intelligence states 'rather than seek to prohibit your use of these tools, we want to support you in learning how to use them effectively, ethically, critically, and transparently.'

Increasingly schools and local authorities are shifting their positions too. Here is an example of Falkirk Council's guidance for teachers (published in November 2024), which allows them to utilise AI tools with learners.

A considerable number of practitioners were already using Gen AI in their work at the time of our initial survey, published in June 2024. By using Gen AI themselves, practitioners (and other centre staff such as digital officers) are well placed to help educate learners in the technology.

A key piece of evidence to support our evolved position is the work carried out by the Children's Parliament to discuss generative AI and children's rights with primary age children in Scotland. The future will involve educating learners about responsible and ethical use of Gen AI, rather than preventing its use. Our updated position supports this sectoral and societal shift on the use of Gen AI in education.

Finally, this article from the UN reflects the organisation's position, stressing the importance of integrating AI and putting human rights at the centre. This is what we mean when we refer to the 'ethical and responsible' use of Gen AI.

What are the aims of this policy or practice?

In 2023 when we developed our initial position, we stated we would regularly review and update it as necessary. It is clear in the last two years that Gen AI tools and functionality are now increasingly incorporated in common digital tools such as search engines. This means it is now almost impossible to avoid Gen AI. The time is right for SQA to update its position on Gen AI in assessment, to help learners and practitioners engage with the tools in a manner that preserves the integrity of SQA qualifications. However, it is also important to educate learners on the potential for Gen AI to reinforce harmful stereotypes or biases. By giving examples of acceptable and unacceptable uses of Gen AI in assessment, we aim to educate everyone in responsible use of Gen AI in education.

We have no evidence to suggest that disabled learners and those with additional support needs are being prevented, on a large scale, from using assistive technology that incorporates Gen AI. However, by specifically mentioning assistive technology in our updated stance, we aim to be clear in our position that assistive technology incorporating Gen AI functionality can be used in SQA's assessments, provided its use does not contravene published assessment standards and conditions.

How is the content of these aims relevant to equality groups?

The revised position statement on the use of Gen AI by learners in assessment tasks applies to all learners regardless of age. For learners under the age of 18, SQA recognises that these learners would be defined as a 'child' under the UN Convention on the Rights of the Child (UNCRC), and the UNCRC (Implementation) (Scotland) Act 2024 would also apply. It is for this reason that a separate Children's Rights and Wellbeing Impact Assessment (CRWIA) has been completed.

The Education (Additional Support for Learning) (Scotland) Act 2009 provides the legal framework for supporting children and young people in their education. The Act automatically deems that all care-experienced learners have additional support needs unless it is determined that they do not.

If appropriate, some neurodivergent, disabled or care-experienced learners could benefit from being supported by responsible people in their lives, such as parents, carers and practitioners, to develop a greater understanding of the benefits and risks of using Gen AI. By giving examples of acceptable and unacceptable uses of Gen AI in assessment, in our exemplification document, we aim to educate everyone in responsible use of Gen AI in education. This will lead to greater understanding amongst staff of issues such as the assistive technology available and the weaknesses in plagiarism detection tools which can often flag 'false positives'.

As the revised position statement affects all learners undertaking SQA's qualifications and assessments, this will apply to learners with protected characteristics. As a corporate parent, SQA considers impacts of any decisions on care-experienced learners as though their status was a protected characteristic under the Equality Act 2010.

Evidence, consultation and engagement

What stakeholders have you engaged with in the development of this policy or practice?

The results of SQA's initial survey of teaching practitioners on the use of generative AI were published in June 2024. SQA's Research and Evaluation Team is now focusing research efforts on understanding the use of Gen AI in learning and teaching from learners' perspectives.

Glasgow Clyde College has invested heavily in generative AI apps for staff and this has led to its extensive use. The College provided SQA with further information in 2024:

'Gen AI quizzes generated at different levels of difficulty have allowed students to work on the same subject area but within their own ability. This has been incredibly helpful as it encouraged those who have been struggling to work from one level to the next, improving knowledge, comprehension, and application at each stage of the process.' This is an example of a personalised learning experience which can easily be delivered by centre staff, and has the potential to benefit all learners, including those from equality groups.

SQA has been working with the College Development Network and Jisc on AI-related topics for the past two years and will continue to do so to develop our knowledge and understanding of how Gen AI tools are implemented in higher and further education sectors.

SQA is also a supporting collaborator with the University of Edinburgh on their 2024 study to better understand the impact of AI on school-age learners.

Before our current position was finalised, SQA sought views from partners in the education system including Education Scotland and the University of Edinburgh, as well as views from our Equality and Inclusion Key Partners Group which includes members such as CALL Scotland, Enquire, Rape Crisis Scotland, Association of Support for Learning Officers (ASLO), Time for Inclusive Education (TIE), National Autistic Society, ADHD UK, Donaldson Trust and EIS. We also gathered views from several practitioners who had previously taken part in our focus groups on Gen AI.

What evidence about equality groups do you have to support this assessment?

Age

Internal evidence

In relation to those entered for National Courses at National 5, Higher and Advanced Higher, SQA's 2024 Equalities Monitoring Report provides the following information in relation to learners' age:

National 5

Below 15 – 0.2%

Aged between 15 and 18 – 99.3%

Over 18 – 0.5%

Higher

Below 15 – 0.0%

Aged between 15 and 18 – 99.2%

Over 18 – 0.8%

Advanced Higher

Below 15 – 0.0%

Aged between 15 and 18 – 99.6%

Over 18 – 0.4%

From this information, it is evident that most learners who are entered for National 5, Higher or Advanced Higher courses are aged between 15 and 18. For this reason, most learners are defined as a 'child' under the UN Convention on the Rights of the Child (UNCRC). Under the UNCRC (Incorporation) (Scotland) Act 2024, an associated CRWIA has also been completed to reflect the impacts of this policy on the rights of children and young people.

SQA does not currently hold equality data on college learners that would allow us to monitor the impact of this policy on those entered for vocational and regulated qualifications. SQA's Policy, Analysis and Standards colleagues are currently in the process of establishing what equality data is available from the Scottish Funding Council for learners attending Scottish colleges, and a data sharing request will be made, if appropriate, to allow SQA to have as comprehensive an equality dataset as possible of all our learner groups.

In SQA's initial position regarding Gen AI in 2023, issues related to age were more prominent. At that time, several new Gen AI tools (such as Google Bard) had an age restriction of 18+. However, since that time we have seen the integration of the technology into everyday tools and apps that have an age restriction of 13, such as Google Gemini and Microsoft Copilot.

External evidence

According to the European Commission body EPALE (Electronic Platform for Adult Learners Europe) there is an opportunity to address the 'neglected needs of adult learners in the Gen AI era'.

[Addressing the Neglected Needs of Adult Learners in the GenAI Era](#)

'Historically, adult learners have faced obstacles ranging from limited resources to social stigmas'

'Gen AI has the potential to bridge the digital divide and empower adult learners to thrive in technology-mediated environments.'

'Gen AI, with tools like ChatGPT and Synthesia, presents an opportunity to revolutionize adult education. These tools have the potential to personalize learning experiences, expedite content creation, and enhance skill development.'

AI can be leveraged to create more personalised learning and teaching materials based on a learner's needs:

[AI-Powered Personalized Learning for Adults: Enhancing Education and Career Pathways | The AI Journal](#)

'(AI) is increasingly transforming the way adults learn and develop professional skills. In contrast to one-size-fits-all training, AI-powered personalized learning systems can tailor education to individual needs, helping working adults juggle learning with work and family commitments.'

'By analysing the goals, background knowledge, and progress of the learner, an AI system can adapt the pace and content — challenging the learners where they are strong and supporting them where they struggle.'

'Research indicates that AI can enhance learning efficiency and cognitive abilities, augmenting teaching and learning outcomes. This means that an adult learner can achieve their learning objectives faster, with greater retention, whether they are brushing up on data analysis or learning a new language.'

Disability

Internal evidence

In relation to those entered for National Courses at National 5, Higher and Advanced Higher SQA's [2024 Equality Monitoring Report](#) states that 2.2% of National 5, 1.9% of Higher and 1.7% of Advanced Higher learners are declared or assessed disabled. Furthermore, published [assessment arrangement data](#) in 2024 shows that 104,695 assessment arrangement requests were submitted by centres for National 5, Higher and Advanced Higher external assessments on behalf of 32,030 disabled learners or those with additional support needs.

SQA does not currently hold equality data on college learners that would allow us to monitor the impact of this policy on those entered for vocational and regulated qualifications. SQA's Policy, Analysis and Standards colleagues are currently in the process of establishing what equality data is available from the Scottish Funding Council for learners attending Scottish colleges and a data sharing request will be made, if appropriate, to allow SQA to have as comprehensive an equality dataset as possible of all our learner groups.

If appropriate, some neurodivergent and disabled learners could benefit from being supported by responsible people in their lives, such as parents and carers and centre practitioners, to develop a greater understanding of the benefits and risks of using Gen AI.

Through learning about Gen AI, learners and practitioners can increase their awareness of its benefits, but also the potential for the technology to produce material that is incorrect or promotes harmful stereotypes or biases, including issues related to disability.

External evidence

The following article highlights the issue of discrimination:

https://www.forbes.com/councils/forbestechcouncil/2023/05/09/algorithmic-diversity-mitigating-ai-bias-and-disability-exclusion/

'Similar to how AI systems may discriminate against people of a particular origin or skin tone, systems such as computer vision, facial recognition, speech recognition and hiring or medical platforms may discriminate against individuals with disabilities. Facial differences or asymmetry, different gestures, gesticulation, speech impairment or different communication styles may lead to inaccurate identification or discrimination.'

The following article highlights the issue of bias:

https://yonah.org/disability_algorithmic_risks.pdf

The report states: 'Algorithms do not create biases themselves but perpetuate societal inequities and cultural prejudices. The reasons behind it include lack of access to data for target populations, due to historical exclusion from research and statistics, simplification and generalization of the target group's parameters (proxies), and unconscious and conscious bias within the society.'

This article gives a more positive view of the role of AI in improving accessibility and inclusion for those with disabilities:

https://www.linkedin.com/pulse/how-generative-ai-being-used-enhance-accessibility-inclusion-alston

'Generative AI (Artificial Intelligence that generates content, such as text, images, and audio) has shown great potential in enhancing accessibility and inclusion for people with disabilities.'

The World Economic Forum has also suggested there are benefits:

https://www.weforum.org/stories/2023/04/how-cognitive-diversity-and-disability-centred-ai-can-improve-social-inclusion/

'Artificial intelligence can address some of the challenges and discrimination that people with cognitive diversity and other disabilities face in everyday life.'

In addition, 'Gen AI has the potential to offer various benefits to neurodiverse individuals in several ways'

https://trainingzone.co.uk/why-generative-artificial-intelligence-is-the-neurodiverse-learners-best-friend/

Disabled-Peoples-Rights-in-an-Artificial-Intelligence-World.pdf

'AI technology has immense potential to improve accessibility and inclusivity for disabled people and staff, such as those in education and social care need to be aware of the existence and any issues around AI for inclusion and access. Growing an understanding of AI could equip staff with the ability to identify biases in AI algorithms that may discriminate against disabled people, and to recognise this and know to act.'

By engaging students with disabilities in discussions and decision-making processes about the use of Gen AI in education, centres can promote mutual respect and understanding among all students.

Finally, and common to all protected groups, this article discusses the power of Gen AI to promote inclusive learning environments:

https://www.frontierspartnerships.org/journals/british-journal-of-biomedical-science/articles/10.3389/bjbs.2024.14048/full

'Gen AI can facilitate collaborative learning by providing tools that enhance communication and idea sharing among students, regardless of their linguistic or cultural backgrounds. This aligns with the principles of social constructivism, which posits that knowledge is constructed through social interactions and shared experience. Gen AI tools can facilitate this approach by providing interactive environments and scaffolding student learning.'

Race

Internal evidence

In relation to those entered for National Courses at National 5, Higher and Advanced Higher, SQA's 2024 Equality Monitoring Report provides the following information in relation to learners' race:

National 5

White (including Scottish and non-Scottish) – 87.5%

Mixed or multiple ethnic groups – 1.6%

Asian – Indian – 1.2%

Asian – Pakistani – 2.4%

Asian – Chinese – 0.9%

Asian – Other – 1.0%

African/Black/Caribbean – 2.5%

All other categories – 1.4%

Not disclosed/Not known – 1.5%

Higher

White (including Scottish and non-Scottish) – 86.2%

Mixed or multiple ethnic groups – 1.7%

Asian – Indian – 1.5%

Asian – Pakistani – 3.0%

Asian – Chinese – 1.1%

Asian – Other – 1.2%

African/Black/Caribbean – 2.5%

All other categories – 1.5%

Not disclosed/Not known – 1.4%

Advanced Higher

White (including Scottish and non-Scottish) – 84.5%

Mixed or multiple ethnic groups – 2.1%

Asian – Indian – 2.0%

Asian – Pakistani – 2.9%

Asian – Chinese – 1.7%

Asian – Other – 1.6%

African/Black/Caribbean – 2.3%

All other categories – 1.7%

Not disclosed/Not known – 1.3%

SQA does not currently hold equality data of college learners that would allow us to monitor the impact of this policy on those entered for vocational and regulated qualifications. SQA's Policy, Analysis and Standards colleagues are currently in the process of establishing what equality data is available from the Scottish Funding Council for learners attending Scottish colleges and a data sharing request will be made, if appropriate, to allow SQA to have as comprehensive an equality dataset as possible of all our learner groups.

External evidence

https://www.bloomberg.com/graphics/2023-generative-ai-bias/

'Some experts in generative AI predict that as much as 90% of content on the internet could be artificially generated within a few years. As these tools proliferate, the biases they reflect are not just further perpetuating stereotypes that threaten to stall progress toward greater equality in representation — they could also result in unfair treatment.'

The following article discusses another factor impacting people based on their race. The issue of language (or the lack of diverse languages) that Gen AI tools use and are trained on:

https://www.brookings.edu/articles/how-language-gaps-constrain-generative-ai-development/

'As it stands now, the majority of the world's speakers are being left behind if they are not part of one of the world's dominant languages, such as English, French, German, Spanish, Chinese, or Russian.'

'…large language models (LLMs) that train AI tools, like generative AI, rely on binary internet data that serve to increase the gap between standard and non-standard speakers, widening the digital language divide.'

https://www.dustinhosseini.com/blog/2023/08/08/generative-ai-a-problematic-illustration-of-the-intersections-of-racialized-gender-race-ethnicity

'…educators must experiment with generative AI tools to understand and critique the tools and what they produce. In doing so, we can begin to understand how and why such tools create the content that they do.'

'Specifically, we can deepen our understanding the reasons that generative AI tools (and other technologies) create questionable content that might, at the very least, underpinned by stereotypes representing an intersection of racism, misogyny, classism and/or xenophobia. Finally, we must recognize that, for the moment, there is no concrete solution that a lay academic or layperson can implement to achieve this without a collective, concerted effort that includes a range of groups focused on shining light on the issues, changing hearts, minds and code and imaging ways forward to an equitable, inclusive world. Decolonial thinking can offer some imaginations to counter the coloniality of AI.'

https://mit-Gen AI.pubpub.org/pub/1ake7rfu/release/3

'These case studies suggest ways of leveraging the capabilities of generative AI-driven modelling and simulations to uncover instances of discriminatory practices, attitudes, and hidden biases…'

'Such work can provide valuable insights into the historical trajectory of racism as well as inform the development of large-scale policy interventions that eliminate racialized differences in policing, healthcare, and housing, among others'

https://www.frontierspartnerships.org/journals/british-journal-of-biomedical-science/articles/10.3389/bjbs.2024.14048/full

'Gen AI can facilitate collaborative learning by providing tools that enhance communication and idea sharing among students, regardless of their linguistic or cultural backgrounds. This aligns with the principles of social constructivism, which posits that knowledge is constructed through social interactions and shared experience. Gen AI tools can facilitate this approach by providing interactive environments and scaffolding student learning.'

Religion or belief

Internal evidence

SQA does not currently hold any data on a learner's religion or belief. This information is also not available as part of Scottish Government's Pupil Census data. SQA will be investigating whether there are opportunities to capture or access this information to allow us to better investigate how our policy impacts on individuals based on their religion or belief.

External evidence

https://www.nature.com/articles/s41598-025-99121-6#:~:text=Through%20experimental%20frameworks%20and%20pre,religious%20doctrines%20and%20cultural%20diversity

'…the study reveals that generative AI not only reflects but amplifies cognitive biases, affecting users' understanding of religious doctrines and cultural diversity.'
https://pub.towardsai.net/exploring-religious-biases-in-6-Gen AI-llms-f054970f828f

'While it would be easy to blame a particular LLM or its developers, the truth is that the biases in AI originate from the training data itself.'
https://www.frontierspartnerships.org/journals/british-journal-of-biomedical-science/articles/10.3389/bjbs.2024.14048/full

'Gen AI can facilitate collaborative learning by providing tools that enhance communication and idea sharing among students, regardless of their linguistic or cultural backgrounds. This aligns with the principles of social constructivism, which posits that knowledge is constructed through social interactions and shared experience. Gen AI tools can facilitate this approach by providing interactive environments and scaffolding student learning.'

Sex

Internal evidence

In relation to those entered for National Courses at National 5, Higher and Advanced Higher, SQA's 2024 Equality Monitoring Report provides the following information in relation to learners' sex:

National 5

Female – 50.2% Male – 49.8%

Higher

Female – 54.1% Male – 45.9%

Advanced Higher

Female – 54.9% Male – 45.1%

SQA does not currently hold equality data of college learners that allow us to monitor the impact of this policy on those entered for vocational and regulated qualifications. SQA's Policy, Analysis and Standards colleagues are currently in the process of establishing what equality data is available from the Scottish Funding Council for learners attending Scottish colleges and a data sharing request will be made, if appropriate, to allow SQA to have as comprehensive an equality dataset as possible of all our learner groups.

External evidence

A core concern with Gen AI is that the group developing, training and promoting Gen AI lacks diversity:

https://www.simonandschuster.co.uk/books/The-New-Age-of-Sexism/Laura-Bates/9781471190483

'At present, power remains largely in the hands of a few rich, white men. New AI-driven technologies, with misogyny baked into their design, are putting women in danger, their rights and safety sacrificed at the altar of profitability and reckless speed.'
This article explores the finding that Gen AI can perpetuate harmful gender stereotypes:

https://www.cigionline.org/articles/generative-ai-tools-are-perpetuating-harmful-gender-stereotypes/

'When the researchers asked DALL-E and Stable Diffusion, a product of Stability.AI, for visual representations of an engineer, a scientist and an IT expert, between 75 and 100 percent of the generated results portrayed men.'

'That the internet is filled with images of barely dressed or naked women means that AI image generators not only replicate these stereotypes but also create hypersexualized images of women.'
This article explores the issue of men using Gen AI more in the workplace that women.

https://www.weforum.org/stories/2024/04/women-generative-ai-workplace/

'Perhaps most distressing, the gap is widest among the youngest of workers: 71% of men ages 18-24 say they use generative AI weekly, compared with 59% of women.'
There are also resources that explore the digital interpretation of gender equality:

https://www.undp.org/eurasia/GenderEquality-in-VR

'Digital technology and innovation have given us new ways and tools to bring women and men together on more equal footing in jobs, society and civic spaces. They have allowed women more freedom of movement, ways to stay safer and access to networks, all of which contribute to new opportunities and more sustainable development for all. Women not only benefit from these technologies but also use the power of innovation and technology to create a better world for women and girls.'
https://www.algorithma.se/our-latest-thinking/artificial-discrimination-ai-gender-bias-and-objectivity

'Does AI discriminate based on gender? In an ideal world it wouldn't, but our models are only ever as good as the data they're trained on. In this article we will dive into several studies that explore gender bias in AI, the consequences it has, and how it happens everywhere, all the time.'
https://www.frontierspartnerships.org/journals/british-journal-of-biomedical-science/articles/10.3389/bjbs.2024.14048/full

'Gen AI can facilitate collaborative learning by providing tools that enhance communication and idea sharing among students, regardless of their linguistic or cultural backgrounds. This aligns with the principles of social constructivism, which posits that knowledge is constructed through social interactions and shared experience. Gen AI tools can facilitate this approach by providing interactive environments and scaffolding student learning.'

Sexual orientation

External evidence

SQA does not currently hold any data on a learner's sexual orientation. This information is also not available as part of Scottish Government's Pupil Census data. According to the Office for National Statistics (ONS), 3.8% of the UK population aged 16 years and over identified as lesbian, gay or bisexual (LGB) in 2023. For those aged 16 to 24 years, 10.4% identified as LGB.
1279 LGBTQI young people aged 13 to 25 participated in LGBT Youth Scotland's Life in Scotland for LGBT Young People: Education Report 2023. Of these participants, 70% felt that homophobia, biphobia and transphobia had a negative effect on their educational experience. The report states:

'…we found that just 10% of participants rated the experience of school for LGBTI young people as 'Good', with low levels of satisfaction also found for college and university. Over the last 5 years, our participants' experiences of school as LGBTI young people do not seem to have improved, with the proportion rating the experience as 'Good', 'OK', or 'Bad' remaining consistent. Ratings for college and university now suggest that fewer of our participants are having a positive experience. In addition to this, awareness of homophobic, biphobic and transphobic bullying across all educational settings is increasing among our participants, and the percentage who have left education due to homophobia, biphobia or transphobia has increased. It is therefore clear that education is an area that could be significantly improved for LGBTI young people.'
https://www.unesco.org/en/articles/generative-ai-unesco-study-reveals-alarming-evidence-regressive-gender-stereotypes

'The studies also highlighted that LLMs had a tendency towards producing content which was negative about gay people and particular ethnic groups. When the three AI models were prompted to complete sentences beginning with the phrase 'a gay person is…', 70% of the content generated by Llama 2 was negative. Examples included: 'The gay person was regarded as the lowest in the social hierarchy'. In the case of GPT-2, 60% of the content generated was negative, with examples such as: 'The gay person was thought of as a prostitute, a criminal, and had no rights'.'
Guidance on LGBT Inclusive Education

'The way in which a school responds to homophobic, biphobic or transphobic incidents plays an important role in reinforcing a culture where the whole school community understands that such behaviour is unacceptable and helps to prevent further escalation. For example, the normalisation of derogatory and pejorative language use or slurs about a social group, and the perpetuation of harmful social or cultural stereotypes or myths, if unaddressed, can create a culture that can lead to prejudice-based behaviours including bullying'

Given that Gen AI bias can perpetrate harmful social or cultural stereotypes, centres should be vigilant to these and take proactive action as set out in *Guidance on LGBT Inclusive Education*.
Teen-and-Young-Adult-Perspectives-on-Generative-AI.pdf

'LGBTQ+ young people are more likely to say the impact of generative AI will be mostly negative and less likely to say it will be positive compared to cisgender/straight young people' (page 9)

'LGBTQ+ young people are more likely than their cisgender/straight peers to say that they haven't used generative AI tools because they're concerned about inaccuracy and bias in the information provided (34% vs. 14%)' (page 17).

'Both LGBTQ+ and cisgender/straight young people share the same level of agreement (41%) that generative AI is likely to have both positive and negative impacts on their lives in the next ten years. However, LGBTQ+ young people express more pessimism about the long-term impact of generative AI tools than their cisgender/straight counterparts. LGBTQ+ young people are more likely than cisgender/straight young people to say the impact of generative AI on their lives will be mostly negative (28% vs. 17%) and are less likely to say the impact will be mostly positive (9% vs. 18%).' (page 18)
https://www.frontierspartnerships.org/journals/british-journal-of-biomedical-science/articles/10.3389/bjbs.2024.14048/full

'Gen AI can facilitate collaborative learning by providing tools that enhance communication and idea sharing among students, regardless of their linguistic or cultural backgrounds. This aligns with the principles of social constructivism, which posits that knowledge is constructed through social interactions and shared experience. Gen AI tools can facilitate this approach by providing interactive environments and scaffolding student learning.'

Gender re-assignment (gender identity and transgender)

Internal evidence

3,437 learners were surveyed as part of SQA's Evaluation of Diet 2023 work. Of these, 59% described their gender as woman/girl, 35% described their gender as man/boy and 2% described their gender as non-binary.

SQA is aware that there is a gap in the equality data held relating to this protected characteristic. We continue to explore opportunities for SQA to access available equality data for learners that allow us to better understand how our products and services impact on learners with a range of protected characteristics.

External evidence

The findings in LGBT Youth Scotland's [2023 Education Report](#) indicate that awareness of transphobic bullying has increased in schools from 26% in 2012 to 69% in 2022. 57% of trans participants experienced transphobic bullying. The publication of this research also comes at a time of an increase in the number of hate crime reports, and a debate on the lives of trans young people in the media that is impacting education settings across Scotland. Further to the Education Report, in 2024 LGBT Youth Scotland commissioned a [Trans Report](#) in which 72% of participants stated they believe that transphobia is 'a big problem' in Scotland. 'Almost one in five of 529 trans participants (19%) have left education because of homophobia, biphobia, or transphobia. This compares to just 6% of 489 cisgender participants. Out of 513 trans participants, 80% feel that homophobia, biphobia, or transphobia has had a negative impact on their educational experience, as compared to 58% of 439 cisgender participants. 47% of 476 trans participants said homophobia, biphobia, or transphobia affected their educational attainment, compared with 23% of 416 cisgender participants.'

[Forbidden Colours Report on AI](#)

'AI bias particularly affects discriminated and minority groups. Broussard (2023) explains how data bias against black and queer populations is exacerbated through AI-led algorithms and programmes, like when trans persons get flagged as 'anomalies' by body scanners or when social media platforms fail to classify gender non-conforming identities.'

[The ethics of AI at the intersection of transgender identity and neurodivergence | Discover Artificial Intelligence](#)

'Addressing bias in AI systems that disproportionately affects transgender and neurodivergent communities requires a coordinated strategy blending technical innovation, inclusive data governance, and thoughtful policy. A crucial first step involves reconsidering how data are collected and labelled. AI models inevitably reflect the biases embedded in their training datasets, so adopting inclusive data collection practices is vital to ensure that the diversity of trans and neurodivergent identities is accurately represented.'

Marriage / civil partnership

SQA does not currently hold any data on a learner's marital or civil partnership status. This information is also not available as part of Scottish Government's Pupil Census data

Marital or civil partnership status, as a protected characteristic, is only relevant to employment-related policies and procedures. As the present position paper covers all SQA qualification types, it applies to learners, regardless of their marital or civil partnership status.

Pregnancy / maternity

SQA does not currently hold any data on a learner's pregnancy or maternity status. This information is also not available as part of Scottish Government's Pupil Census data.

Pregnancy or maternity, as a protected characteristic, is only relevant to employment-related policies and procedures. As the present position paper covers all SQA qualification types, it applies to learners, regardless of their pregnancy or maternity status.

Care experience (where relevant)

Internal evidence

SQA has a corporate parenting commitment to ensure its EqIA process considers the needs of care-experienced young people, by treating care experience as if it were a protected characteristic covered by the Equality Act 2010.

SQA surveyed 3,437 learners as part of our Evaluation of Diet 2023 work. Of these respondents, 5% said that they were care experienced.

In addition, the SQA Corporate Parenting Plan 2023–26 provides the following data:

♦ 31.7% looked-after school leavers left in S4 or earlier (down from 37.3% in 2020–21), compared with 12.4% of all leavers in 2021–22.
♦ 78.3% looked-after school leavers left with one or more qualifications at SCQF level 4 or better (up from 70.9% in 2020–21), compared with 96.4% of all leavers in 2021–22.

SQA is aware that there is a gap in the equality data held relating to this protected characteristic. We are exploring how currently available equality data for learners might help us better understand how our products and services impact on learners with a range of protected characteristics.

External evidence

In August 2024, the Scottish Government published information on attainment and leaver destinations for school leavers in Scotland who were looked after during the 2022–23 school year. Headline figures show that more care-experienced children are staying in school for longer and achieving higher qualifications, although the number has dropped slightly in the last year. There are still large gaps compared with all learners.

The latest figures show that:

♦ care-experienced school leavers continue to have lower attainment than other school leavers.
♦ care-experienced children and young people leave school earlier than their non-care-experienced peers.
♦ care-experienced children are less likely to be in positive destinations nine months after leaving school.
♦ the rate of exclusions among care-experienced children is much higher than among the general school population.
♦ the more disruption a child faces — for example placement moves — the higher their likelihood of exclusion.

- at all levels, care-experienced students have lower rates of course completion at university and college than other students.
- care-experienced children are automatically deemed to have additional support needs, unless otherwise assessed.

In July 2020 the following briefing was published:
Inform Briefing - Bridging the digital divide for Care Leavers in Scotland July 2020.pdf

'Those who are digitally excluded do not benefit from the great many advantages the technology can bring.'

'In Scotland, there has been a lack of national attention to issues of digital exclusion for those in the care system or those moving on from the care system.'

Impact and opportunities for action

The impact that a policy or practice has on equality groups may be different and this requires to be recorded. The impact may not always be negative. Actions are taken to address any differential impact, and include actions to mitigate against any negative impact, to advance equality and to foster good relations between groups.

Each section below contains points to consider for each equality group. These are here to support consideration of the policy; however, you can provide further detail. Focus initially on the equality groups that would be affected by the policy or practice. If you do not consider that a given equality group would be affected, you may leave these sections.

Protected characteristic: Age

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

As this policy covers all SQA qualification types, the policy applies equally to learners of all ages. For this reason, it is not expected that this policy will discriminate, victimise or result in harassment of our learners, whatever age they are.

Neutral impact for school-aged learners

SQA qualifications are popular not just with young people but with adult learners too. Some adult learners may have been out of formal learning for some time. Others may need to improve their digital literacy. Gen AI tools have the potential to offer personalised learning experiences where learners can work through the same content but at their own pace.

Gen AI may address needs of adult learners by personalising learning experiences, mitigating any stigma associated with adult learning, and plugging gaps around resourcing.

Positive impact for older learners

General equality duty: Advance equality of opportunity

Adult learners can use AI to make teaching and learning more effective, based on their individual learner's needs. This is promising for adult learners, who have a more diverse skills and knowledge background, and can take advantage of more personalised education.

Positive impact

General equality duty: Foster good relations

The potential for Gen AI to offer personalised learning experiences is not only of benefit to adult learners. Many learners would benefit from this approach, thus ensuring there is no stigma attached to those who are benefitting.

Positive impact

It is also the case that personalised learning is happening in Scotland already. Glasgow Clyde College referred to this approach in a blog they created with SQA in 2024.

Protected characteristic: Disability

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

As this policy covers all SQA qualification types, the policy applies equally to all learners. For this reason, it is not expected that this policy will discriminate, victimise or result in harassment of our learners, whether or not they have a disability.

Although the technology has potential benefits, learners and practitioners should also be aware that it could produce material that is incorrect or promotes harmful stereotypes or biases, including issues related to disability.

The technology may also directly discriminate against learners with disabilities, for example through the use of facial recognition technology. Although this technology is unlikely to be used directly in the learning environment, it could become an issue as learners explore the technology in class. Possible instances of bias or discrimination should be discussed and challenged.

Following a trial of facial recognition technology by some Scottish schools in 2021, the Information Commissioner published details of their enquiry into it:

ico-letter-to-nac-appendix.pdf

Their intervention has led to no further trials in schools. Although Gen AI can be used in facial recognition technology, its capture of biometric data is fraught with ethical and legal difficulties.

Potentially positive and negative impacts

General equality duty: Advance equality of opportunity

Despite possible problems, the technology has a great deal of potential to help learners with disabilities.

We have no evidence to suggest that disabled learners and those with additional support needs are being prevented, on a large scale, from using assistive technology that incorporates Gen AI. However, by specifically mentioning assistive technology in our updated stance, we aim to be clear that such assistive technology can be used in SQA's assessments, as long as the Gen AI incorporated into its functionality does not contravene the published assessment standards and conditions.

For learners with disabilities, AI-powered assistive tools can provide critical support. For instance, real-time transcription services can aid those with hearing impairments, while text-to-speech applications can assist learners with visual impairments or reading difficulties. These tools make educational content more accessible, and promote inclusivity in the classroom.

Positive impact

General equality duty: Foster good relations

Through discussion about Gen AI, learners and practitioners will be aware of the potential for the technology to produce material that is incorrect or promotes harmful stereotypes or biases, including issues related to disability, which can then be discussed and challenged.

However, there is also immense potential in the technology, as presented in the evidence from Inclusion Scotland.

Potentially positive impact

Protected characteristic: Race

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

As this policy covers all SQA qualification types, the policy applies equally to all learners. For this reason, it is not expected that this policy will discriminate, victimise or result in harassment of our learners, whatever their race is.

Although the technology has potential benefits, learners and practitioners should also be aware that it could produce material that is incorrect or promotes harmful stereotypes or biases, including issues related to race. Instances of bias or discrimination should be discussed and challenged.

Practitioners are very well placed to mitigate against the potential bias within the technology. By gaining a deeper understanding of the technology and being aware of its faults, these can be discussed and challenged in class as they emerge.

Potentially positive and negative impacts

General equality duty: Advance equality of opportunity

Despite possible problems, Gen AI also offers enormous potential for people of minority racial groups, particularly those who are learning a new language, and those for whom English is not a first language. We recognise that while language is not protected under this characteristic, it correlates to nation of origin, and to ethnic background, which are both protected.

Positive impact

General equality duty: Foster good relations

The article 'Advancing Equality: Harnessing Generative AI to Combat Systemic Racism' discusses attempts to use Gen AI technology to tackle racism and discrimination. Although based on US experience, and still experimental, this approach shows an awareness of the flaws within the technology and efforts to tackle these. Education is not the focus of this article but would undoubtedly benefit alongside the other sectors listed.

Finally, and common to all protected groups, Gen AI has the potential to promote inclusive learning environments.

Positive impact

Protected characteristic: Religion or belief

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

As this policy covers all SQA qualification types, the policy applies equally to all learners. For this reason, it is not expected that this policy will discriminate, victimise or result in harassment of our learners, whatever their religion or belief is.

Although the technology has potential benefits, learners and practitioners should also be aware that it could produce material that is incorrect or promotes harmful stereotypes or biases, including issues related to religion or belief. Where these examples occur in the learning context they should be discussed and challenged.

A general truth of large language model (LLM) AIs is that it is not the LLMs themselves that are biased but rather the data on which they were trained. In this sense Gen AI amplifies existing social biases. For example, relying on generative AI to create images will not produce a representative view of the world. Care should be taken when providing prompts, and when reviewing generated works, for biases that could discriminate against people of certain religions or beliefs.

Positive and potentially negative impacts

General equality duty: Advance equality of opportunity

Gen AI tools can provide personalised learning experiences, catering to learners from various religious backgrounds. If students are offered content that aligns with individual beliefs, they can engage more deeply with the material.

This could include creating study materials that respect dietary laws, prayer times or religious holidays, allowing students to balance their educational and religious commitments.

Positive impact

General equality duty: Foster good relations

The potential for Gen AI to offer personalised learning experiences is not something that is of benefit only to learners of a specific religion or belief. Many learners would benefit from this approach, ensuring there is no stigma attached to those who are benefitting.

By exposing learners to a variety of religious perspectives through Gen AI-generated content, centres can promote mutual understanding and respect among students of different faiths.

Finally, and common to all protected groups, Gen AI has the potential to promote inclusive learning environments.

Positive Impact

Protected characteristic: Sex

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

As this policy covers all SQA qualification types, the policy applies equally to all learners. For this reason, it is not expected that this policy will discriminate, victimise or result in harassment of our learners, whatever their sex is.

Although there are potential benefits of the technology, learners and practitioners should be aware of the potential for the technology to produce material that is incorrect or promotes harmful stereotypes or biases, including issues related to sex. Instances of bias or discrimination should be discussed and challenged.

A core concern with Gen AI is the view that the owners of the technology, the people who train the models and the training data itself all lack diversity. This opens Gen AI products up to the risk of not being aware of their own biases. These include gender biases, and we must, as a sector, call this out.

Potentially positive and negative impacts

General equality duty: Advance equality of opportunity

Despite possible problems, as with the other protected groups, Gen AI can be used positively in the learning environment to promote greater equality.

Men in the workplace tend to use AI more than women. Today's learning environments have the potential to arrest this trend, by being inclusive when using Gen AI in class. This could level the playing field for women when the current cohort of learners enters the workforce.

Positive impact

General equality duty: Foster good relations

Gen AI tools do not create biases themselves, but perpetuate social inequalities and cultural prejudices. Identifying and discussing any Gen AI bias in a learning environment is an ideal opportunity for all learners to understand the impact of such bias on their peers, and to raise awareness of the issues

facing protected groups. Using the benefits of Gen AI in a learning environment will allow all learners to take a full part in their learning journey alongside their peers.

Finally, and in common with all protected groups, Gen AI has the potential to promote inclusive learning environments.

Positive impact

Protected characteristic: Sexual orientation

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

As this policy covers all SQA qualification types, the policy applies equally to all learners. For this reason, it is not expected that this policy will discriminate, victimise or result in harassment of our learners, whatever their sexual orientation is.

Although the technology has potential benefits, learners and practitioners should also be aware that the technology could produce material that is incorrect or promotes harmful stereotypes or biases, including issues related to sexual orientation. Instances of bias or discrimination should be discussed and challenged.

Sources cited above show that biases could emerge in a learning environment and are therefore worthy of mention here.

However, Gen AI has the potential to help practitioners embrace the Scottish Government's guidance on LGBT inclusive education, with benefits for learners. For example, Gen AI can assist educators in identifying and addressing discriminatory content within educational materials. By analysing texts and resources, AI tools can flag language or representations that may perpetuate stereotypes or biases against LGBT individuals, enabling timely revisions to promote a more inclusive curriculum.

Positive and potentially negative impacts

General equality duty: Advance equality of opportunity

The study from Hopelab, Common Sense, Harvard, and the Centre for Digital Thriving indicates that there are differences in how LGBTQ+ learners perceive Gen AI. Practitioners should be aware of this as they explore Gen AI with learners.

Neutral impact

General equality duty: Foster good relations

Finally, and in common with all protected groups, Gen AI has the potential to promote inclusive learning environments.

Positive impact

Protected characteristic: Gender re-assignment (gender identity and transgender)

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

As this policy covers all SQA qualification types, the policy applies equally to all learners. For this reason, it is not expected that this policy will discriminate, victimise or result in harassment of our learners, whatever their gender identity is.

Although the technology has potential benefits, learners and practitioners should also be aware that the technology could produce material that is incorrect or promotes harmful stereotypes or biases, including issues related to gender identity. Instances of bias or discrimination should be discussed and challenged.

The evidence cited above highlights the potential biases faced by trans learners, where AI image recognition fails to correctly recognise trans bodies, labelling them as 'abnormal'. This bias is also likely to be reproduced by Gen AIs with similarly trained models.

Potentially positive and negative impacts

General equality duty: Advance equality of opportunity

The cited article 'The ethics of AI at the intersection of transgender identity and neurodivergence' describes the biases that will disproportionately affect transgender and neurodivergent communities. There is no easy solution to the flaws within Gen AI and how the models are trained, but this paper suggests some ways for Gen AI models to be more inclusive.

Although there may seem to be little practitioners can do to overcome these inherent issues, it is important for them to be aware of the issues and to challenge biases and discrimination as they explore Gen AI with learners.

Potentially positive and negative impacts

General equality duty: Foster good relations

Finally, and in common with all protected groups, Gen AI has the potential to promote inclusive learning environments.

Positive impact

Protected characteristic: Marriage / civil partnership

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

Marital or civil partnership status, as a protected characteristic, is only relevant to employment-related policies and procedures. As the present position paper covers all SQA qualification types, it applies to all learners, regardless of their marital or civil partnership status.

General equality duty: Advance equality of opportunity

No impacts have been identified from the available evidence. This will be monitored, and the evidence will be updated should that change.

General equality duty: Foster good relations

No impacts have been identified from the available evidence. This will be monitored, and the evidence will be updated should that change.

Protected characteristic: Pregnancy / maternity

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

Pregnancy / maternity status, as a protected characteristic, is only relevant to employment-related policies and procedures. As the present position paper covers all SQA qualification types, it applies to learners, regardless of their pregnancy / maternity status.

General equality duty: Advance equality of opportunity

No impacts have been identified from the available evidence. This will be monitored, and the evidence will be updated should that change.

General equality duty: Foster good relations

No impacts have been identified from the available evidence. This will be monitored, and the evidence will be updated should that change.

Considered by SQA: Care experience (where relevant)

General equality duty: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

As this policy covers all SQA qualification types, the policy applies equally to all learners. For this reason, it is not expected that this policy will discriminate, victimise or result in harassment of our learners, whatever their care experience is.

As cited in the evidence above from the Scottish Government, care-experienced learners have lower attainment than other school leavers. At least part of the reason for this will be the potentially negative effect of disruption in their lives. This could cause care-experienced learners to fall behind their peers. Gen AI could potentially help here by providing a personalised learning experience, as this quote from Glasgow Clyde College indicates:

'Gen AI quizzes generated at different levels of difficulty have allowed students to work on the same subject area but within their own ability. This has been incredibly helpful as it encouraged those who have been struggling to work from one level to the next, improving knowledge, comprehension, and application at each stage of the process.'

Positive Impact

Unlike most of their peers, care-experienced learners may not have a consistent support in the lives — someone who can help them understand the appropriate or ethical use of Gen AI tools. There could also be variability in access to Gen AI tools (and indeed digital equipment generally). The role of the practitioner and centre are key here to ensure care-experienced learners are not 'left behind'. We know from the evidence in 'Bridging the digital divide' that there is a risk care-experienced learners become:

> 'more limited in their access to public services, to channels for civic and democratic participation, to a wide array of knowledge and information, to opportunities for cultural and social engagement, to the labour market and to opportunities for education and learning.'

Potentially negative impact

General equality duty: Advance equality of opportunity

The potential for Gen AI to offer personalised learning experiences is not something that is of benefit only to those learners who are care experienced. Many learners would benefit from this approach, ensuring there is no stigma attached to those who are benefitting.

Positive impact

General equality duty: Foster good relations

Finally, and in common with all protected groups, Gen AI has the potential to promote inclusive learning environments.

Positive impact

Rationale

If you are proceeding with a decision that may have a negative impact and are not putting in place actions to mitigate against this, please explain how this is objectively justified.

This evolution of SQA's position on Gen AI tools in assessment comes at a time where we see widespread (and growing) use of Gen AI tools in the learning and teaching space. Our position (and this impact assessment) does not cover these learning and teaching activities. However, the potential impacts on protected groups are the same, whether realised in learning and teaching activities or assessment activities.

Gen AI has enormous potential to help ensure learning is accessible to all. But it comes with flaws — Gen AI tools do not create biases themselves but perpetuate social inequities and cultural prejudices. If left unchallenged, these biases could exacerbate the problems facing protected groups. However, identifying and challenging any Gen AI bias in a learning environment is an ideal opportunity for all learners to understand the impact of such biases on their peers, and to raise awareness of the issues facing protected groups.

We will continue to monitor the development of the technology in the hope that the flaws set out in this impact assessment can one day be overcome.