## **Guiding Principles**

The Moral Risk Framework for the Ethical Use of Data is grounded in Trinity University's values. Because these values may sometimes appear to be at odds when deciding whether to implement a data-based tool, and because much of the ethical concern around the use of data relates to reinforcing or amplifying existing bias, the guiding principle for the Moral Risk Framework is Intentional Inclusion. Where bias is possible, Trinity will use data-based tools to support and provide resources to ensure that no individual or group is excluded or penalized.

## Moral Risk Framework

Risk Category	Definition	Action	Examples
High risk	Tools that have the potential to cause damage by excluding or penalizing individuals or groups or by suggesting outcomes that affected individuals might feel harmed by	EPG Approval and Annual Review Required	Admissions Modeling - Enrollment Management: applicants are screened out based on academics, demographics, and/or likelihood to yield or retain.  Affinity-based financial aid - Enrollment Management: admitted students are offered financial aid based on a mix of academic performance and likelihood to attend Trinity.  Student Success Platform or in-house analyses - Student Success/Institutional Research & Effectiveness: enrolled students are flagged as at risk based on academic, behavioral, and/or social/emotional factors.  Academic advising: Student Success: enrolled students are advised to change majors based on overall academic performance and grades in specific courses.  Natural Language Processing - HCM: Peakon Topics' analysis uses Natural Language Processing (NLP), a field of machine learning, to analyze employee comments and identify important themes and overall sentiment related to issues that matter to the people in your organization.  Attrition Prediction - HCM: Uses survey responses and other employment characteristics to predict attrition.
Medium risk	Tools that have the potential for bias that also limit the	EPG Approval Required	People analytics skills - People analytics: For a worker W in a job J, this will say W's skills, W's skill gaps w.r.t. J, and a score [Strong, Good, Fair, Low, 0] for W's skills match with J. (WARNING: Prohibited

Risk Category	Definition	Action	Examples
	agency of those whose data is used for the tool	Annual Review Required by the Vice President of the Department using the tool	for use in hiring/promotion. Professional development only).  Suggested skills for external candidates - HCM: External candidates for a job upload a resume, then this tool offers up to 15 suggested skills they may add to their profile. Candidates can choose to add (or not) each of these, or other skills by searching.  Talent marketplace - HCM: Workers can visit the Talent Marketplace to learn about and match with jobs and gigs that fit their skills. Workers can also create and post a Gig to build a team of other workers who have specific skills.
Low risk	Tools that have the potential for bias that enable the agency of those whose data is used for the tool	VP Approval and Annual Review Required by the Vice President of the Department using the tool	Suggested skills for job requisitions - HCM: Lists up to 5 skills the job poster could add to job skill list (job posters can enter any job skills, but the suggested skills for job requisitions makes recommendations to facilitate entry).  Task recommendations - UX: Recommends tasks a user might want to do (e.g. request time off, file an expense report) based on their past Workday tasks and tasks done by others with the same role. Recommendations are tailored per-user and incorporate day-of-week and time-of-year. (users can find any task they want but task recommendations facilitate use).  Career hub - HCM: Hub for workers to manage their careers and growth. Full of suggested jobs/gigs to consider, skills you could get, learning opportunities you could pursue (workers can access all possible jobs and gigs, but the career hug highlights certain jobs and gigs).  Learning recommendations - HCM: Suggest learning materials (1) related to skills worker W has said they want to develop; (2) related to past learning content viewed by W and what similar workers learned;

Risk Category	Definition	Action	Examples
			(3) topically similar to past learning content viewed by W (workers can still search all content, but the recommendations help them see options that are likely to interest them).  Suggested jobs for external candidates - HCM: External candidates who have applied for at least 1 job, get suggestions of other openings they could apply for, based on skills inferred from their submitted resume, and characteristics of the job(s) applied for.  Suggested skills for workers - HCM: Suggests up to 10 skills for the Workday Skills Cloud that a worker could add to their profile, based on the info currently in their profile (including Anytime Feedback).
Negligible risk	Tools that are purely transactional (the tool uses data about processes or things) with no foreseeable risk of bias or potential damage	VP Approval and pre-deployment verification that the tool produces accurate results  For example: Customer payments: make sure that the tool recommends the correct invoices;  Journal insights: make sure that the tool correctly flags anomalous entry lines and does not flag non-anomalous entry lines	Customer payments - Financial Management: Given a payment to a certain supplier, this tool recommends one/multiple invoices that may match the payment.  Journal insights - Financial Management: Reviews journal (accounting) entry lines as they come in, and flags potentially-anomalous ones for review. It provides a suggested correction if possible.  Spend category recommendations for purchases - Spend Management: When a user creates a non-catalog requisition, this tool suggests up to 5 spend categories for it.  Supplier invoice automation - Financial Management: When a customer receives an invoice from a supplier, this tool can suggest Spend Category, Cost Center, Location, and Region, based on customer's past invoices and how they were categorized.  Task recommendations - UX: Recommends tasks a user might

Risk Category	Definition	Action	Examples
		Spend category recommendations for purchases: make sure that the spend categories suggested by the tool are the correct spend categories	want to do (e.g. request time off, file an expense report) based on their past Workday tasks and tasks done by others with the same role. Recommendations are tailored per-user and incorporate day-of-week and time-of-year.  Time anomalies for managers - Workforce and Pay: When worker W submits time blocks, this tool scores the probability they are anomalous, and displays those with prob 80-90% (Medium) and >90% (High) for manager to review.  Expense protect - Financial Management: When an expense report is submitted, this tool reviews each line and can create up to 2 flags: (1) amount outlier – the amount (\$) is very different from what the model expects; (2) incorrect expense item – this item is very unlikely based on the other items in the report, and item probably needs to be changed.