

# AI Usage Policy



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|-----------------------------------------|--------------------------------------------------------------------------------------------------------|---------------------------|--------------------|
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| Version no                              | Nature of change                                                                                       | Last approved             | Approval           |
| 1                                       | New Policy                                                                                             |                           | Board              |
| 2                                       |                                                                                                        |                           |                    |
| 3                                       |                                                                                                        |                           |                    |
| 4                                       |                                                                                                        |                           |                    |

## 1. Introduction

This policy sets out our approach to the use of AI-powered tools for work-related activities.

We understand the need to embrace emerging technology and recognise that AI-powered tools can produce impressive responses on a wide range of subjects. However, these tools present a number of risks that we cannot ignore.

When you are using these tools for work-related activities, it is imperative for us to ensure that you do so in a safe and responsible way, and in a manner that does not compromise the organisation or its reputation.

Disclosure of AI use is required whenever AI significantly impacts the creation, accuracy, or authenticity of content. It is essential for maintaining trust, enabling informed consent, and complying with ethical guidelines.

The aim of this policy, including the limits that we have set on the use of AI-powered tools for work-related activities, is to mitigate against these risks. This policy will be regularly reviewed and supported by workshop sessions with colleagues to better understanding existing use, share knowledge and explore how AI could be incorporated further for the benefit of the organisation.

The policy does not form part of your contract of employment and we reserve the right to amend it at any time.

## 2. Scope

This policy applies to anyone working for us. This includes Board members, employees, involved tenants, casual/relief workers, contractors, agency staff, volunteers and work experience students.

## 3. Roles & Responsibilities

### **Assistant Director of ICT and Facilities Management (strategic lead for use of AI):**

- Ensuring policies and procedures are in place for the use of AI solutions
- Ensuring that colleagues are aware of approved solutions and permitted use of AI solutions
- Approval of new AI solutions where appropriate, in consultation with DPO/DPA and Procurement Manager
- Oversee the use of AI solutions to ensure compliance with this policy, including monitoring tools where appropriate.

Directors, Assistant Directors, Service Managers and other managerial colleagues:

- Ensuring colleagues are aware of approved AI solutions and permitted use
- Ensure compliance with this policy within their service areas
- Seek advance approval from ICT on the use of new AI solutions
- Ensuring colleagues participate in appropriate data protection training
- Inform the Data Protection Officer/Advisor of all actual or potential data protection breaches in their service area without delay

**All Board members, employees, involved tenants, casual/relief workers, contractors, agency staff, volunteers and work experience students:**

- Use permitted AI solutions in accordance with this policy and associated guidance
- Participate in appropriate data protection training
- Speak to ICT about any concerns or issues involving the use of AI solutions, including notifying ICT of any unpermitted use of AI in the workplace
- Comply with data protection and confidentiality requirements set out in this policy.
- Inform the Data Protection Officer/Advisor of all actual or potential data protection breaches in their service area without delay

## 4. Definition of AI-powered tools

AI-powered tools are applications that utilise artificial intelligence technologies to perform tasks that typically require human intelligence, enhancing efficiency and decision-making across various industries.

### Key features of AI-powered Tools

**Automation:** AI tools can automate mundane and repetitive tasks, freeing up time for more complex activities. This includes data entry, scheduling, and customer service inquiries.

**Data Analysis:** They can process and analyse large volumes of data quickly, identifying trends and insights that would be difficult for humans to determine.

**Personalisation:** AI tools can tailor experiences and recommendations based on user behaviour and preferences.

**Natural Language Processing:** Many AI tools incorporate NLP to understand and generate human language enabling functionalities like chatbots and virtual assistants that can interact with users in a conversational manner.

**Facial recognition and Detection:** AI tools can identify the presence of a face in an image or video frame and use artificial intelligence to analyse and compare unique facial features.

**Learning and Adaption:** AI tools improve over time as they learn from new data input, allowing them to adapt to changing conditions and user needs.

AI powered tools are transforming various industries by enhancing efficiency, improving decision-making, and providing personalised experiences. As technology continues to evolve, the capabilities and applications of these tools are expected to expand further, making them integral to modern business operations and everyday life.

## 5. Current Approved Use of AI in the Workplace

**Microsoft Copilot:** an AI-powered digital assistant integrated into Microsoft 365 apps. It can be used to boost productivity by summarising emails, drafting documents and presentations, creating images, and providing contextual information. It functions as a conversational, personalised companion to automate tasks and improve efficiency. Microsoft is not copyrighted in a way that restricts users from utilising its services. Users can use Copilot services without worrying about copyright claims, as Microsoft has committed to assuming responsibility for any potential legal risks involved. Our copyright licence does not cover us for AI usage and therefore usage of other AI powered digital assistants could expose CHS to the risk of copyright claims.

**You are strictly prohibited from using AI-powered digital assistants to:**

- Carry out any task that has legal or financial consequences (e.g. drafting terms and conditions or other legal documents)
- Carry out any part of a grievance and/or disciplinary process as investigator or chair of a formal process (for example decide a grievance outcome or appropriate disciplinary penalty)
- Carry out any task that requires you to input the organisation's confidential information and/or personal employee data.
- Create images that use a person's voice or visual likeness without obtaining their written consent in advance.

What is acceptable and what is prohibited will depend on your job and the nature of the task that you are engaged in. If you are unsure about using AI-powered digital assistant for a task that you are undertaking, you should speak to your line manager or the ICT team for further advice.

**The use of any other digital assistants (e.g. ChatGPT, Google Gemini) is not permitted for work-related activities.**

**Microsoft Teams:** provides live, AI-powered transcription for meetings, webinars, and calls, converting spoken dialogue into text in real time with identified speakers.

**Teams must only be used for work-related activities whilst logged into our ICT systems.**

**Whilst MS Teams is our preferred product for online meetings, we acknowledge that other organisations may use other tools such as Zoom and this is permitted where necessary. If you have any questions or concerns about the use of other systems please speak to the ICT team.**

**Search Engines** (e.g. Google) – all search engines contain AI powered search capability and may be used to answer specific work-related issues.

**The use of search engines is permitted, however no confidential, personally identifiable or sensitive information should ever be entered into a search engine.**

**ICT Security products** (e.g. Sophos) – We and other ICT providers use a range of ICT security products to protect ICT infrastructures, most of which have AI capabilities. This may include fingerprint biometrics or facial recognition to identify permitted users.

## **6. Prohibited Use of AI in the Workplace**

You are not permitted to use AI on your personal phone, laptops or tablets or personal accounts for any work-related activities.

You are not permitted to use AI glasses in the workplace, without the advance approval of the Director of Corporate Services and Assistant Director of ICT and Facilities Management.

## **7. Your Obligations when using Permitted AI-powered Solutions at Work**

## **Inaccurate and unreliable information**

Although AI powered solutions have come a long way, it is important that you are aware that their responses may not always be accurate or reliable. We expect you to verify any generated content, prior to relying on it, using more credible sources.

## **Clearly mark any work that has used AI tools to provide summaries, collate information or compare Documents**

Disclosure of AI use is required whenever AI significantly impacts the creation, accuracy, or authenticity of content. It is essential for maintaining trust, enabling informed consent, and complying with ethical guidelines.

### **When to Disclose AI Use:**

- **Substantial Content Creation:** Use GenAI to draft text, generate images, or create code.
- **Public Interaction:** Inform users when interacting with chatbots or AI-driven systems.
- **Professional Work:** Disclose when AI is used to create deliverables, such as reports or marketing content, especially if the client expects human-originated work. Cite AI tools used for literature reviews, data analysis, or writing assistance in methodologies or acknowledgments.
- **Deepfakes/Synthetic Media:** Label altered audio, video, or images to prevent deception.

### **When Disclosure is Usually Not Necessary:**

- **Basic Tools:** Routine use of AI-driven grammar checkers, spell checkers, or minor formatting refinements.

### **Key Considerations for Disclosure:**

- **Be Specific:** Name the tool and describe how it was used
- **Maintain Accountability:** Even if AI is used
- **Follow Policy:** Adhere to specific guidelines from publishers, CHS, or regulatory bodies like the EU AI Act.

## **Bias**

AI powered solutions are prone to bias due to the data that they are trained on and output from these tools may be unfair to certain groups of people.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying and victimisation.

If you are using output from any of the permitted AI powered tools in your work, you must ensure that you address and correct any bias and comply with the organisation's Equality, diversity and inclusion (EDI) policy and Anti-harassment and anti-bullying policy at all times.

### **Copyright Infringement**

AI powered tools can regurgitate copyrighted material. You must take responsibility for ensuring final deliverables do not plagiarize or infringe upon existing intellectual property.

To minimise the risk of copyright infringement, you are prohibited from copying, reproducing and/or distributing entire or substantial parts of output from AI powered tools.

### **Confidential Information**

You should be aware that the content that you input into an AI-powered tool may be used to train its model and could form part of the responses to questions posed by other users. Therefore, information may, inadvertently, be released into the public domain, including if the system is breached or hacked. This could lead to risk of harm to individuals and us potentially facing legal proceedings.

It is imperative that, when you are using AI powered tools, you do not share any confidential information that belongs or relates to the organisation. This includes, but is not limited to:

- Details of tenants, customers, suppliers, agents, partner organisations, employees, workers, Board members, involved tenants, agency staff, volunteers, work experience students.
- Information relating to the security of the organisation's premises or its ICT or communications systems
- Commercial, financial, business development or business planning information
- Any other information that is provided to you, by the organisation in confidence.

Confidential or personal information may only be entered into an AI tool that has been built or procured specifically for our sole use and use of that tool has been specifically sanctioned for that purpose.

### **Data Protection**

You are strictly prohibited from sharing personal data and special categories of personal data with any AI powered tools.

Personal data is any information that relates to a living individual who can be identified from that information

Special categories of personal data mean information about an individual's racial or ethnic origin, political opinions, religion or beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

Any personal data and special categories of personal data must be handled in accordance with our Data Protection Policy.

## **Environmental Factors**

The use of AI gives rise to environmental considerations which must be taken into account alongside operational efficiency and innovation benefits. AI services rely on energy-intensive data centres, substantial computational resources and water consumption for cooling, all of which may contribute to the organisation's indirect carbon footprint if not appropriately managed.

Accordingly, the organisation should prioritise the use of approved AI tools supplied by trusted providers with clear sustainability commitments, avoid unnecessary or disproportionate use of high-compute AI functions, and take environmental impact into account as part of procurement, governance and digital efficiency decision-making. Responsible use of AI therefore includes due regard to energy efficiency, supplier transparency and the organisation's wider environmental objectives.

## **8. Supporting Policies**

- Data Protection Policy
- Equality, Diversity and Inclusion Policy
- Anti-harassment and Anti-Bullying Policy
- Employee Code of Conduct
- ICT Security Policy
- Disciplinary Policy

## **9. Breach of Policy**

We implement a strict policy with regards to the way in which AI powered tools are used in the workplace.

Any breach of this policy, including any inadvertent disclosure of confidential information or personal data, will be investigated in accordance with our Disciplinary Policy.

## **10. Changes to this Policy**

As these tools continue to advance and develop, we will carry on assessing and navigating the risks associated with using them to ensure that our policy remains current and effective, whilst supporting the organisation to maximise the benefits of AI technology.

If there are any changes to this policy, we will notify you accordingly.