

Harlow Council - Artificial and generative AI Policy.

Document Information

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Introduction and Policy Statement:

Artificial Intelligence (AI) and generative AI refer to computer systems that perform tasks requiring human intelligence, learning from experience, adapting to new information, and making data-driven decisions. These technologies can create realistic text, images, and code, responding naturally to human language and understanding various data types.

Recognising the potential risks to council operations and residents, we are committed to protecting the confidentiality, integrity, and availability of all council, stakeholder, and resident data. This policy outlines how AI should be used by council employees and Members, focusing on security risk evaluation and data protection.

As we integrate AI into our operations, it is essential for all staff to understand their roles, responsibilities, and ethical considerations. This policy provides guidelines for using AI tools, protecting user privacy, and ensuring transparency. The purpose is to ensure AI technologies like ChatGPT, Copilot, and others are used legally, ethically, transparently, and for the community's benefit.

Scope

This policy applies to all end users of the Council's IT systems, including council staff, Members, and partners. It encompasses shared services across Authorities and managed services through external companies. The policy covers any AI tools used for council work, whether on council-provided devices or personal devices used for council work or research. It is particularly relevant to any application of AI tools where personal data is involved.

Evaluation of AI tools

No AI tool should be used unless the security of the tool has been evaluated through vigorous research and testing. This includes reviewing the tool's security features, terms of service, location of data storage, and privacy policy. The reputation of the tool developer and any third-party services used by the tool should also be reviewed.

If council staff or members wish to use an AI tool that is not currently being used within the council, a request will require raising through the IT portal, evaluated, authorised by the incumbent assistant director of the service where the request has originated. IT & Digital services reserve the right to deny requests relating to AI tools which do not meet the above criteria. The only current tool which is available to Council staff is CoPilot.

Protection of Confidential Data

Data that is confidential, proprietary, commercially sensitive or protected by regulation must not be uploaded to any AI tool without prior formal approval from the appropriate department or data owner. This approval must be documented. This requirement applies to data related to residents, staff, members, partners, suppliers, or any other stakeholders. Personal data should never be uploaded under any circumstances. Any requests for the use of such data must be submitted through the relevant forms on the IT help portal.

Council staff, members, and stakeholders using council-supplied equipment, applications, or resident data must exercise discretion when sharing information publicly. Before uploading or sharing any data into AI tools, consider whether you would be comfortable sharing this information outside of the Council and the potential repercussions if the data were leaked publicly. Ensure that no personal data is uploaded unless a data sharing agreement is in place. Confidential data should never be uploaded under any circumstances. If there is any doubt about whether information can be shared, please contact the Data Protection Officer (DPO) and consult with your immediate line manager and assistant director.

Use of Reputable AI Tools

Only reputable AI tools should be used, and users must exercise caution. AI tools ingest large quantities of data, and the veracity of this data cannot be guaranteed, as AI outputs do not typically reference their source data. Therefore, the integrity of the output must be carefully considered. Additional guidance on using AI tools will be available to staff upon request or within Kaonet. Please ensure compliance with all recommendations contained within this policy and the provided guidance

Compliance with security policies

Council staff, members, suppliers, and other stakeholders must apply the same security best practices used for all council and resident data. This includes using strong passwords, keeping software up to date, allowing managed equipment to perform updates and not suppress those updates, following our data retention and disposal policies, and ensure any incidents or suspicious activity is reported to the IT Service to immediately investigate.

Generative AI

Generative AI must adhere to all the regulations and guidelines outlined in this document. This includes ensuring transparency, protecting data privacy and security, preventing biases, complying with copyright laws, and maintaining ethical standards. All generative AI applications should be used responsibly, with regular monitoring and evaluation to ensure they align with Harlow Council's policies and values.

Copyright, Equality, and Ethical Use

When using AI tools, ensure all outputs, such as images and text, comply with copyright laws and the Council's Acceptable Use Policy. This includes avoiding the creation or use of content that violates these policies, such as obscenities, illegal use of internet services, or anything that could bring Harlow Council into disrepute. Always credit the AI tool used for generating content to maintain transparency.

AI tools may produce content that is biased or offensive due to the data they are trained on. Staff must be aware of how AI-generated outputs might impact people, as these tools can inherit social biases or stereotypes and may display inappropriate cultural values or sensitive content. AI tools are not designed to recognise gender or ethnicity, so these factors should be considered when using generated content.

The use of AI tools at Harlow Council must be ethical and comply with all organisational policies. All AI-generated outputs should be reviewed by staff before use to ensure they adhere to Harlow Council's Data and Equalities policies and are not discriminatory, offensive, or inappropriate in any way. This review process helps to ensure that the content aligns with the Council's commitment to equality and ethical standards.

Training and Awareness

To ensure the responsible and effective use of AI tools, Harlow Council is committed to providing training material and resources to all staff members. This training will cover the fundamental concepts of AI and generative AI, highlighting their differences and applications within the Council. Staff will be educated on ethical and legal considerations, including guidelines to avoid biases, ensure fairness, and comply with data protection laws and copyright regulations. Emphasis will be placed on best practices for protecting confidential and personal data, including the procedures for obtaining necessary approvals before using AI tools with sensitive information. Practical applications of AI tools in daily operations will be demonstrated through case studies and examples. Additionally, staff will be required to follow guidance on incident reporting and response protocols to handle data breaches or misuse of AI tools effectively, as laid out in this document. It is imperative that prior to using any AI related tools, that the knowledge and skills needed to use AI tools responsibly is obtained and understood. Further guidance and support will be available through the IT help portal and Kaonet. However, it is still entirely the responsibility of the member of staff to ensure that all considerations and guidance have been followed, and any misuse or breach of confidentiality belongs to the member of staff.

Incident Response

In the event of a data breach or misuse of AI tools, it is crucial for all staff members to follow the established incident response protocols. Immediately report any suspected or confirmed incidents to the IT department immediately by phone or through the IT help portal. Provide detailed information about the incident, including the nature of the breach, the data involved, and any actions taken so far. The IT team will investigate the incident, take necessary steps to mitigate any damage, and provide further instructions. Staff should also notify their immediate line manager and the Data Protection Officer to ensure all relevant parties are informed. Adhering to these protocols helps protect the integrity and security of council data and ensures a swift and effective response to any incidents.

Regular Audits and Ownership

To ensure ongoing compliance and effectiveness, this policy will be subject to regular audits and updates. The IT & Digital Services team will conduct annual reviews to assess the implementation and impact of AI tools within the Council. Any significant changes in AI technology or related regulations will prompt an immediate review and update of this policy. Staff will be informed of any updates and provided with the necessary training to adapt to new guidelines. Regular audits will help identify potential risks and areas for improvement, ensuring that the Council's use of AI remains secure, ethical, and aligned with organisational goals.

DWP Robotics and AI Guidance

Local Authorities seeking to use robotic solutions to access DWP, HMRC and/or Home Office derived data, to enable them to automate some processes and make efficiencies may do so if they follow the parameters in the following Link.

If any LA wish to use public Artificial intelligence (AI) in relation to DWP derived data, they should not do so until they have contacted lawelfare.lasecurity@dwp.gov.uk to seek advice and request permission.

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