Generative Artificial Intelligence (Gen AI) Usage Policy

1. Policy statement

1.1 Gloucestershire County Council (the council) recognises the potential that generative AI (GenAI) can play in enabling the council to meet its aims and objectives. Whilst this is the case, it is important that any use is undertaken in a legally compliant and ethical manner, recognising and managing any potential risks.

1.2 Gen AI uses statistics and information to generate connections and patterns between words, concepts and ideas. It uses probability to produce a response based on data patterns it has seen during training and remembered from previous interactions. GenAI has many uses, including summarisation, creative writing, educational support, content generation, search, translation and customer support.

1.3 This policy should be read in conjunction with the following:

Code of Conduct for Employees
ICT, Information Management and Data Protection Policies, in particular;

- Cyber and Information (Procurement) Policy
- Data Protection Policy
- ICT Equipment Policy
- Information Protection and Handling Policy
- Information/IT Access Policy
- Software Management Policy
- Social Media Policy
- Password Policy

1.4 The purpose of this policy is to set out the council's guidance on the acceptable use of GenAI in the workplace and how it should be adopted to ensure maximum benefit whilst minimising any risks or concerns. This policy is designed to ensure that the use of GenAI is ethical, complies with all applicable laws (such as data protection and copyright), regulations, and council policies, as well as complementing the council's existing information and security policies.

2. Principles

- **Data Privacy and Security**: We prioritise the privacy and security of personal data (both service user and staff). All data collected will be handled in compliance with relevant regulations and used for improving or delivering our services and complying with legal obligations.
- **Transparency:** We are committed to transparency in how our GenAI systems operate. We will inform users about the capabilities and limitations of our GenAI technologies.
- **Bias Mitigation:** We will work to identify and mitigate biases in our GenAI systems to ensure fairness and inclusivity in all aspects of our services.
- **Accountability:** We take responsibility for the outcomes of our GenAI systems and are open to feedback and accountability mechanisms from users and stakeholders.
- **Continuous Improvement:** We will strive for continuous improvement in our GenAI technologies through research, development, and collaboration with experts in the field.
- **Ethical Use:** We will adhere to ethical principles in the development and deployment of GenAI, avoiding harm to individuals, communities, or society as a whole.
- **Accessibility:** We will design our GenAI systems to be accessible to all users, regardless of their abilities or background, and will ensure compatibility with assistive technologies.
- **Education and Awareness:** We will promote education and awareness about GenAI technologies, their potential impact, and how users can make informed decisions about their use.
- **Regulatory Compliance:** We will comply with all relevant laws and regulations governing GenAI technologies.

3. Scope

3.1 This policy applies to anyone who uses GenAI on behalf of the council.

3.2 This policy applies to any use of GenAI for council business purposes. It applies to use during and outside normal hours of work and whether or not the use is on an individual's own device or one owned by the council, and whether at home, in the office or from a remote working location.

3.3 Users may use GenAI applications for work-related purposes subject to adherence with this policy.

4. Potential benefits

4.1 GenAI can play a significant part in enabling the council to meet its aims and objectives, as it can:

- **automate** routine tasks and processes, such as document processing, customer service, and fraud detection, freeing up staff to focus on higher value activities and complex cases.
- enhance **creativity** and **innovation**, by generating new ideas, insights, and solutions, and enabling collaboration across disciplines and domains.
- improve **resident satisfaction** and loyalty, by personalising experiences, anticipating needs, and providing faster and better services.
- **support decision making** and policy making, by analysing large and diverse data sets, identifying patterns and trends, and providing evidence-based recommendations.
- improve **social care, health care** and **education**, by providing personalised care plans, education support plans, monitoring health conditions, and detecting risks and anomalies.

5. Risks

5.1 Alongside the benefits the use of GenAI can bring to the council, there are also significant risks that all users should be aware of:

- Outputs can be made up, false, or misleading; commonly referred to as ‘hallucinations’.
- Outputs can omit key information.
- Outputs can introduce biases and discrimination.
- Information input into GenAI software can be more widely used across the system for developing or training the AI model.
- GenAI may make use of and generate biased, discriminatory, or offensive content.
- Data entered into GenAI applications may enter the public domain. Personal, special category or commercially sensitive information can be inadvertently released, breaching regulatory requirements, customer or supplier contracts, or compromise intellectual property rights, ultimately resulting in a breach of data protection laws.
- Risks and information security breaches may not be immediately obvious, especially when it is not clear what information is being used, where it is stored or how it is being used.
- There remains legal uncertainty and complexity on how existing legislation applies to GenAI applications.

- An AI model can be acquired by another organisation or external operator, who then use legitimately collected information for unlawful purposes.
- A third party may build a service or software solution on top of an unauthorised GenAI application.

5.2 Use of GenAI carries inherent risks. A comprehensive risk assessment should be conducted for any project or process where regular use of GenAI is proposed. The accountable IAO must ensure the risk assessment considers potential impacts including legal compliance, bias and discrimination, security (including technical protections and security certifications), and data sovereignty and protection. This can be achieved through the completion of a Data Protection Impact Assessment (DPIA).

5.3 For an initial discussion regarding the use of GenAI in any project or process please contact the Information Governance Team.

5.4 **Users remain accountable for all outputs generated by any GenAI applications, and should ensure they are accurate, compliant and fit for purpose.**

6. Permitted uses and applications

6.1 Some uses and specific GenAI applications have been pre-approved. Other purposes or applications to meet specific business need must go through an approval process before being used or purchased (see section 9.1).

Business-specific GenAI Systems will be approved on a case-by-case basis for specific purposes, e.g., Magic Notes for social care services.

The list of pre-approved GenAI purposes and systems will be regularly reviewed and updated.

6.2 Pre-approved purposes, where no personal data is to be processed:

- Drafting correspondence and presentations
- Developing draft project plans
- Conducting research and data analysis
- Producing draft marketing materials
- Creating summaries and meeting notes
- Ideas generation
- To meet specific business needs

6.3 The following available GenAI applications have been pre-approved for use in accordance with this policy:

- **Microsoft Copilot:** integrated with Bing, Microsoft Edge, Windows 11, and Microsoft 365 apps. Allows searching for information, generating text and images, and automating work.
- **Microsoft Editor and PowerPoint Designer:** improves accessibility and readability of created content.
- **Adobe AI Assistant (Acrobat beta):** this is integrated into Acrobat for document insights and content generation.
- **Public GenAI Applications:** For use with publicly available information only, e.g., Copilot for Bing.

7. GenAI Ethics

7.1 When considering the implementation, procurement, or any other use of new GenAI the responsible officer (i.e., the project or programme sponsor, lead commissioner, Head of Service, Director, or Information Asset Owner), is accountable for implementing or using it in a way that is consistent with the following rules:

- **Privacy and security**: GenAI systems must protect the privacy and security of users' data and personal information and comply with relevant laws and regulations.
- **Fairness**: AI systems must treat all people fairly and avoid bias or discrimination based on factors such as race, gender, age, or disability.
- **Reliability and safety**: GenAI systems must perform reliably and safely under different conditions and contexts, and be resilient to errors, attacks, or misuse.
- **Inclusiveness**: GenAI systems must empower everyone and engage people from diverse backgrounds, abilities, and perspectives.
- **Transparency**: GenAI systems must be understandable and explainable to users, developers, and regulators, and provide clear information about their capabilities, limitations, and assumptions.

8. Responsibilities

- **Users**: remain accountable for their own use of GenAI and any outputs generated and used.

- **Commissioners/Contract Managers/Project Managers**: are responsible for the design and development of GenAI systems and software in line with the Cyber & Information Management (Procurement) Policy. They should also ensure GenAI service providers are assessed for their data sovereignty

practice before commissioning a service or awarding a contract.

- **Information Asset Owners (IAOs)**: are **accountable** for the proper purchase and management of GenAI systems, including ensure monitoring, audit and accuracy measures are in place.

- **Information Asset Managers** (**IAMs)**: are **responsible** for the proper purchase and management of GenAI systems, including ensuring monitoring, audit and accuracy measures are in place.

- **Digital & ICT**: is responsible for assessing any GenAI software or systems to ensure they meet the council's technical and information security standards before use.

- **The Information Management Service (IMS)**: is responsible for providing advice on the use of personal and special category data in GenAI systems and software.

9. Governance

9.1 **Before accessing new versions of GenAI technology, users (e.g. project leads, commissioners, DICT) must first notify the council's Information Governance Team** of their intention to use, the reason for use, and the expected information to be input as well as the generated output and distribution of content.

Users should also be aware that:

- Personal and/or special category data can only be used with GenAI once a DPIA has been completed and authorised by the Data Protection Officer and appropriate Information Asset Owner.
- The council's cyber procurement policy must be followed for the procurement of GenAI solutions.
- Terms of use and privacy policies need to be fully understood to ensure they are appropriate, before putting any personal data into a GenAI application.
- Privacy notices must be updated where the use of GenAI is being implemented.
- Outputs should always be reviewed and edited for accuracy prior to use; users are responsible for reviewing GenAI output and are accountable for ensuring the accuracy of GenAI generated output before use/release.
- An appropriate method for critically reviewing GenAI output for any biases or discrimination should be adopted, where the system has 'hallucinated' a reply.

- Copyright laws must be adhered to when utilising GenAI.
- All applicable laws, regulations and council policies must be complied with when using GenAI.
- Identify and disclose content produced/generated via GenAI, with the name of the document author clearly recorded on the document.

  Footnote example: ***Note:*** *This document contains content generated by Artificial Intelligence (AI). AI generated content has been reviewed by the author for accuracy and edited/revised where necessary. The author takes responsibility for this content.*

If you have any doubt about the ethics, lawfulness, accuracy of outputs, copyright, or confidentiality of information, do not use GenAI.

10. Prohibited uses and applications

10.1 Some specific GenAI applications have been prohibited as they do not meet the requirements of this policy. The **ChatGPT** platform is **blocked** by the council as it does not meet current security requirements.

10.2 Prohibited uses include:

- Not submitting personal, special category or commercially sensitive data into any public GenAI application.
- Not using AI tools, including GenAI, to undertake automated decision making with regard to individuals, nor for fully automating any part of the governance process within the council.
- Not using AI tools, including GenAI applications to create any form of legal documents.
- Not entering any information into a public AI solution that, if made public, may cause concern, breach the code of conduct, legislation or council policy.
- Not using GenAI to generate content that is discriminatory, offensive, or inappropriate.
- Not using GenAI to generate content that infringes the intellectual property rights of others, including but not limited to copyrighted material.

10.3 The list of prohibited GenAI uses and applications will be regularly reviewed and updated.

11. Environmental impact

11.1 Better use of information and data can help optimise delivery, such as through analysis of travel routes and thus reduce the environmental impact.

11.2 However, the development, maintenance, and disposal of technology all come with a large carbon footprint, due to energy-intensive processing. For example, training AI models can produce about 626,000 pounds of carbon dioxide[1]. Training a single GenAI model can consume as much as 284,000 litres of water. That's equivalent to the amount of water an average person would consume over the course of 27 years.

11.3 The data industry is predicted to account for more carbon emissions than the automotive, aviation and energy sectors combined. We must work to better understand the impact of digital activities on our carbon footprint in order to start reducing it.

11.4 Decisions to enable real time data feeds, data warehousing, the use of AI and predictive analytics, and other data heavy solutions, need to be justified in the context of the environmental impact.

11.5 Implementing data minimisation and retention policies should be considered as mitigations, as they can help reduce unnecessary carbon emissions.

12. Sources of advice and support

- ICO Guidance on AI and Data Protection
- Secure AI NCSC Guidelines.url
- Principles-for-the-security-of-machine-learning.pdf (ncsc.gov.uk)
- The UK AI Safety Institute
- Principles of AI in policing
- regulatory sandbox for AI in healthcare
- Ada Lovelace Institute Foundation models Public Sector AI
- Alan Turing Institute Ethics and Governance in AI practice

13. Policy Compliance

13.1 By using GenAI, users acknowledge that they have read and understood this policy and have considered and documented the risks associated with any proposed use of GenAI. Any suspected or observed information security

[1] University of Massachusetts, Amherst

breach should be promptly reported and details provided to the Information Security Team.

13.2 Misuse of GenAI can be investigated and lead to disciplinary action. The council reserves the right to monitor use and compliance with the law and policy; we may use system analytics to achieve this.Where there is a suspected breach of the law, or any council policy (including but not limited to the council's Information Management and Security Policies) users should have no expectation of privacy regarding their use of digital communication tools and/or the internet.

13.3 Where evidence of misuse is found to have taken place a more detailed investigation may be undertaken in accordance with the Information Security Incident Response and Escalation Procedure, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or manager(s) involved in this procedure.

13.4 Security breaches by a council employee, that result from a deliberate or negligent disregard of any security policy requirements may, in the council's absolute discretion, result in disciplinary action being taken against that employee. In the event that breaches arise from the deliberate or negligent disregard of the council's security policy requirements by a user who is not a direct employee of the council, the council shall take such punitive action against that user and/or their employer as the council in its absolute discretion deems appropriate.

13.5 The council may, in its absolute discretion refer the matter of any breach of the council's information security policy requirements to the police or Information Commissioner's Office for investigation and (if appropriate) the instigation of criminal proceedings if in the reasonable opinion of the council such breach has led or is likely to lead to the commission of a criminal offence.

14. Monitoring and review

14.1 The pace of development and application of GenAI is such that this policy will be under regular review. Please send your feedback, suggestions, and experiences to dpo@gloucestershire.gov.uk to enable us to improve the policy and ensure it continues to meet the needs of the council.

Document Control

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Content in this policy was developed from information generated using GenAI software. Content has been reviewed by IMS and Legal colleagues, as well as members of the council's Information Board.

Version History

Version	Version date	Summary of Changes
1.0	May 2024	First version
2.0	October 2024	Added reference to education support plans in section 4.1 on Potential Benefits
3.0	May 2025	Amendment to section 6 to clarify pre-approved uses and AI solutions to support business processes.
4.0	July 2025	Amendment to section 10 to detail prohibited/blocked genAI applications as approved by the SIRO at Information Board May 2025
4.1	July 2025	Addition of specific wording to 6.2 re personal data.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 3 years.

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Appendices

Abbreviations & Glossary

Abbreviation	Description
GPT	"generative pre-trained transformer", which is a type of LLM that uses deep learning to produce natural language texts based on information requested in the input. ChatGPT is an example of a GPT model which can be used to generate text.
LLM	Large Language Model.

Glossary	Description
ChatGPT	an artificial intelligence (AI) chatbot that uses natural language processing to create humanlike conversational dialogue.
Data sovereignty	the concept that digital data is subject to the laws of the country in which it is collected. However, The EU and UK GDPRs apply to the processing of EU or UK residents' personal data, regardless of where that processing takes place. Moreover, it applies to both data controllers and data processors, so, whether your organisation uses or provides a Cloud service that processes EU or UK residents' data, you must comply.
Generative AI	A type of artificial intelligence which can be used to create new content (for example, text, code, images, videos or music) (referred to as the output). The AI uses machine learning algorithms to analyse large data sets.
Hallucination	AI hallucination is a phenomenon wherein a generative AI toolperceives patterns or objects that are non-existent or imperceptible to human observers, creating outputs that are nonsensical or altogether inaccurate.
LLM	A large language model (LLM) is a type of artificial intelligence (AI) algorithm that uses deep learning techniques and massively large data sets to understand, summarise, generate and predict new content.
Prompts	These are the inputs or queries that a user provides to the generative AI application to receive the required output. Prompts can be used by the generative AI application to further train the LLM.