Artificial Intelligence and Automation Usage Policy

Introduction

The use of Artificial Intelligence (AI) technology is rapidly advancing across both the public and private sector. This technology could have significantly positive impacts for how we work at Southwark Council, if utilised and deployed safely.

When introducing any new technology, we must be both aware of risks, but alive to the opportunities they offer us, in this case in the exciting domain of AI and Generative AI (GenAI).

> *AI, or Artificial Intelligence, refers to the development of computer systems that are able to perform tasks that would normally require human intelligence, such as visual perception, speech recognition, decision-making, and language translation*
>
> *Generative AI, sometimes called GenAI, is a type of AI that can create original content, such as text, images, video, audio, or software code, in response to a user's prompt or request. It relies on sophisticated machine learning models called deep learning models, which simulate the learning and decision-making processes of the human brain*
>
> *Robotic Process Automation (RPA) is a technology that uses software robots or 'bots' to automate highly repetitive and routine tasks that were previously performed by humans.*
>
> *Definitions generated by Copilot*

As part of our [Technology and Digital Strategy 2024-26](#) we are embracing Artificial Intelligence (AI), Generative AI (Gen AI) and Robotic Process Automation (RPA). Understanding how these technologies work and how to use them safely is essential as they play an increasingly significant role in our work environment.

Aims of the policy

This policy aims to:

- Describe the requirements for all employees and users of Council information and services to be aware of safe practices relating to the use of Generative AI (GenAI).
- Provide guidance and access to best practice information relating to acceptable usage of Generative AI technologies.

Who is impacted by the policy?

- Employees of the council
- Agency workers
- Contractors working on our behalf
- Individuals undertaking work experience
- Employees of contractors to the council

The pace of development and application of AI and automation is such that this policy will be in a constant state of development. Please share your feedback, suggestions, and experiences to enable us to improve the policy and to ensure that it continues to meet the needs of councils.

The policy is owned and managed by the Technology and Digital Services Team.

Benefits of AI and Automation

There are potentially many ways that Southwark Council can optimise and benefit from AI to work more efficiently, drive innovation and, deliver better services. Here are examples of how AI, Gen AI and RPA are being used currently in Southwark and other Local Government Authorities:

- Southwark Copilot Trial (until March 2025)
  - Responding to FOI Requests
  - Meeting transcriptions and note-taking
  - Drafting papers, proposals and business cases
  - Summarising papers, documents and email threads
  - Creating communications and engaging presentations
- Magic Notes AI (Social Care)
  - Magic Notes uses AI technology to transcribe, summarise and populate a pre-defined template of the conversations between social workers and citizens of Southwark. This reduces the administrative burden for Social Workers allowing them to spend more time in face-to-face interactions.
- Communication Mining Tools (AI)
- Chat Bots (AI)
- Analytic system migration (Automation)
- Multi-Agency Safeguarding Hub referrals (Automation)
- Invoice processing (Automation)

Benefits:

- Efficiency and faster processing
- Helping us meet rising demand
- Dealing with existing pressures and backlogs
- Releasing capacity to do other things for example, preventative work, more face-to-face, problem-solving etc.
- Data accuracy - removal of human error in data processing
- Easier to migrate to new systems
- Cost reductions including - Azure Financial Operations, reduction on spend on temporary staff
- Improved staff morale, job satisfaction and better work life balance

Risks and limitations

Data Loss

- One of the biggest risks is around the loss of sensitive data through inputting it into non-approved AI tools. We are working on how we can communicate this key message to staff through our existing communications channels and mandatory training.
- Having an approved AI tool such as Microsoft CoPilot helps to fill the requirement for AI and will need to be considered when looking at the next steps following the pilot
- Implementation of Microsoft Information Protection will help us to identify and prevent large datasets leaving our environment

AI getting things wrong

- The second key message and principle we need to communicate and adhere to as an organisation is the ensure that AI and Automation is never directly asked to make a decision and that all work done by AI is checked and owned by an accountable person.
- There needs to be a "Human in the Loop", no AI tool can be 100% relied upon and that any work or recommendations made by an AI tool need to be ratified by a qualified professional person.
- There needs to be a 'Human in Loop' in any piece of work utilising AI or automation software to ensure that the work is accurate and relevant. Ultimately it is the person that is responsible and accountable, not the software. This will be covered in any training, guidance and governance when rolling out such technologies**.**

Impact on the Workforce

- Whilst this is a Digital initiative that is being delivered as a part of the Digital Strategy, we acknowledge that there is a potential impact on the workforce. We will continue to work closely with HR to help ensure that Automation and AI has a positive impact the workforce. Like other technological tools, generative AI is an enabler, and managers need to understand how to use such tools to improve service delivery. We strive to implement it in a way that enhances peoples' experience of work.

Roles and Responsibilities

This policy applies to all workers irrespective of status, including temporary staff, agency workers, contractors, consultants, and third parties who have access to the Council's data and systems.

It applies whether the access to and use of systems and data occurs on the Council's premises or remotely from any location including, but not limited to, home-working.

All users shall therefore adhere with this policy and facilitate its implementation. Users are expected to adhere to data privacy and security protocols. Individual accountability will be considered in cases of deliberate misconduct or gross negligence.

Whilst AI, Gen AI and RPA are available on our own personal devices and via our Internet Browser if we are using or exploring these tools in our Council roles there are several things to consider:

1. **Data Privacy** Always be mindful of the data you share with AI systems. You should not share any personal information about individuals or commercially confidential information related to Southwark Council unless they have been verified and approved. A tool like Copilot already has access to the information in our Microsoft environment. Personal information should never be shared with other external Gen AI platforms such as ChatGPT.

2. **Quality Control** These should be used as a tool to support staff in their work, not directly replacing staff doing that work. You should always verify the accuracy and relevance of AI-generated content before using it. Review and edit responses as needed.

3. **Bias awareness** AI can inadvertently introduce biases via its inputs or coding. Be aware of this and use AI to complement human judgement, not replace it.

4. **Security** Always protect your login credentials and follow the Council's Information Security Policy and Acceptable Use Policy when using any external apps or AI tools. Never download any applications on Council devices without first seeking approval and guidance from IT Teams.

5. **Ethical Considerations** Use AI in a manner consistent with our values, code of conduct, and ethical guidelines. Our values can be found here ... Values (sharepoint.com)

6. **Copyright** You should consider the intellectual property rights of the source content that is used in GenAI. Users must adhere to copyright laws when using GenAI. It is prohibited to use GenAI to generate content that infringes upon the intellectual property rights of others, including but not limited to copyrighted material.

7. **Disclosure** Content produced via GenAI must be identified and disclosed as containing GenAI-generated information. For example, the definitions of AI and Gen AI earlier in the document were generated by Copilot and were subsequently referenced as such.

8. **Risks** Use of AI and GenAI will carry inherent risks. A risk assessment should be conducted and presented for consideration and approval by the Technical Design Authority where any project or process proposes the use of AI or Automation. The risk assessment should consider potential impacts including legal compliance; bias and discrimination; security (including technical protections and security certifications); and data sovereignty and protection, for example the considerations from numbered sections 1 to 7 above. If personal data is identified in the course of this assessment, then a DPIA will be required.

AI, including GenAI like Copilot, is a valuable resource that can enhance our productivity and creativity when used responsibly. By understanding how AI works and following safe practices, we can harness its potential while maintaining the highest standards of quality and ethics.

References and sources policy

The Council is obliged to abide by all relevant UK and European Union legislation.

The requirement to comply with this legislation shall be devolved to employees and agents of the Council, who may be held personally accountable for any breaches of information security for which they may be held responsible. The Council shall comply with the following legislation and other legislation as appropriate:

- Data Protection Act 2018
- UK General Data Protection Regulations (UK GDPR)

Impact on Diversity

The Council demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the Equality Act 2010.

Monitoring and compliance

Period of review

Until a new policy is formally adopted this document will remain in force and operational.

This policy will be reviewed in accordance with the Digital and Technological Services' policy review programme.

If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, because of complaints or findings from inside or outside the organisation, the Technology and Digital Services team will initiate an immediate review.

Where appropriate, key stakeholders, and interested parties will be consulted as part of any review of this policy.

This policy is approved by Southwark Council's Corporate Management Team.

These examples will be updated to reflect actual use cases identified through the pilots of AI, Gen AI and Automation.

Operational arrangements

Appropriate examples of using generative AI

Example 1: Research
Generative AI can be used as a research tool to help gather background information on a topic relating to an area with which you are unfamiliar. For example, you might be interested in sustainability and the environment and need to know more about how carbon emissions are calculated. Generative AI will be able to quickly provide you with an overview of this, to aid understanding.

Example 2: Summarising Information
Generative AI can be used to summarise publicly available information such as a news article or business report, which could be added to an appendix to a report you are writing. This could save time when producing reports.

Example 3: Developing code
A software developer may wish to use a generative AI to create a front-end interface to a website, which is used by the public, and use the outputs to speed up the work involved in design and build. This will save time coding and provide coding functions which the developer may not be aware of.

Inappropriate uses:

Example 1: Do not use for authoring messages and summarising facts to others.
Generative AI can write things in different styles. It could write a paper about a change in a policy, but it's not a good idea to use public tools like ChatGPT for this. You would have to put the new policy into the tool, but you must not put personal, sensitive, or inflammatory information into it.

Example 2: Do not input data into an unapproved AI tool or without the data owner's consent.
We must be vigilant on what AI tools we use and what information we input into them. ChatGPT is an unapproved AI tool where Southwark does not have control over the data. Microsoft Copilot can be used as this tool is approved and we are the data controllers and owners.

In summary

The potential opportunities and benefits for the use of AI within the Council are not yet fully explored. As we explore these as an organisation, employees are encouraged to do so in a safe and secure way.

As regulatory control catches up with this rapidly developing technology, we want to ensure that staff have the support and guidance in place to minimise the risks it poses whilst maximising the benefits on offer.

Whilst this policy relates specifically to AI, Gen AI and Automation. Our technology and digital teams are continuing to explore how different models of AI can be used across the organisation.

If you have ideas for how AI could be used to help your service, please contact the Technology and Digital Services Team to discuss your idea and explore how it can be implemented.