

# Generative Artificial Intelligence in the Workplace Policy & Procedure

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## Contents

Generative Artificial Intelligence in the Workplace.....	1
Document Details .....	3
Document Version Control.....	3
Approval Process .....	3
Consultation .....	3
Policy Statement.....	4
Scope .....	5
Principles .....	5
Procedure.....	6
Governance .....	6
Risks and benefits of AI .....	8
What is AI and Some Common Definitions.....	10
Principles for the Appropriate Use of AI .....	11
Appendices.....	13
Related Information Sources:.....	13

# Document Details

## Document Version Control

Document Version	Approval Date	Author
1.0	October 2023	Danielle Whalley, GMCA IDG Team
2.0	May 2024	Danielle Whalley, GMCA IDG Team
2.1	November 2024	Simon Depledge, Sammy Alloway, GMCA IDG Team

## Approval Process

<b>Approved By</b>	GMCA & TfGM Information & Data Governance Boards and AI task and Finish Group and other stakeholders across TfGM & GMCA.
<b>Policy Owner</b>	GMCA and TfGM's Information and Data Governance Board.

## Consultation

1. Changes made based on feedback to version 1.0. This feedback was received from consultation with GMCA & TfGM Information & Data Governance Boards and AI task and Finish Group and other stakeholders across TfGM & GMCA.
2. Further changes received and version 2.0 prepared
3. 2.1 update changed Governance points on AI tool pathway, as approved by John Laurence Curtis and Richard Fuyertes.

# Policy Statement

4. The use of artificial intelligence (AI) is transforming the way individuals are working. Informed and responsible use of AI has the potential to increase efficiency in the workplace, improve decision making and foster innovation. With these benefits come potential risks, including data protection breaches, copyright issues, the protection of confidential information including commercial information, equality and diversity and ethical considerations, and compliance with wider legal obligations. Overall, our approach must continue to ensure that we foster trust with the public when their data is safely, securely and appropriately used.
5. We permit the well informed and responsible use of authorised AI applications by the workforce in carrying out identified business activities. This list of authorised applications and those applications that can't be used will be made available via the corporate intranet.
6. This policy covers AI in general but is more focused on generative AI (GenAI). Reference to the definitions section of this policy provides more information relating to the different forms of AI.
7. The terms of this policy must always be complied with when using AI to carry out business activities, whether in relation to your particular role or otherwise.
8. The purpose of this policy is to set out our key organisational commitment to AI and guiding principles. It is acknowledged that the pace of development and application of AI is such that this policy will be subject to development and change.
9. This policy is owned by the Information & Data Governance Boards for Transport for Greater Manchester (TfGM) and Greater Manchester Combined Authority (GMCA).

# Scope

10. This policy applies to all TfGM, and GMCA staff, including uniformed employees of GMFRS, who are covered under the following schemes:
  - a. National Joint Council for Local Authorities, hereafter referred to as the Green Book.
  - b. Joint Negotiating Committee for Local Authority Chief Executives/Chief Officers.
  - c. National Joint Council Scheme of Conditions of Service Sixth Edition 2004 (as amended by subsequent NJC circulars), hereafter referred to as the Grey Book.
  - d. National Joint Council for Brigade Managers of Fire and Rescue Services, Constitution and scheme of conditions of service (5th edition), hereafter referred to as the Gold Book.
11. This policy sets out the principles and conditions of use that must be followed when using AI.
12. Please ensure you have read and understood this policy in conjunction with other related organisational policies such as but not limited to the Acceptable Use Policy as well as your employee contract.
13. Should a breach or violation of this policy be identified, it may result in disciplinary action in accordance with relevant TfGM or GMCA policies. Where an individual is not an employee of TfGM or GMCA, other action may be taken including the termination of an agency contract.

# Principles

14. Our guiding principle is that AI will always be considered if the public benefit outweighs the risks (see: Procedure, Principles of Use of AI)

# Procedure

## Governance

15. Before accessing AI technology, users must first notify the Information & Data 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. This is so that it can be assessed and approved or rejected by the AI Task and Finish Group. A list of approved and not approved AI tools, including what they can be used for will be made available via the Intranet.
16. To contact the Information & Data Governance team use the request for support form found on the Information and Data Governance Team's intranet page.
17. **For GMCA:**  
To request access to an existing AI tool: Submit a Software Request via [Hornbill](#)  
To request a new AI tool: Submit a Digital Work Request via [Hornbill](#)
18. **For TfGM:** Place your request via the [IS Front Door](#).

## Suppliers

19. Any use of AI technology in pursuit of work-related activities must be done with full acknowledgement of the policies, practices, terms and conditions of that developers and/ or supplier.

## Copyright

20. You must adhere to copyright laws when utilising 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.
21. If you are unsure whether a particular use of GenAI constitutes copyright infringement, you should contact the Information & Data Governance Team before using GenAI.

## Accuracy

22. All information generated by GenAI must be reviewed and edited for accuracy prior to use. If you are a user of GenAI you are responsible for reviewing outputs and are accountable for ensuring the accuracy of GenAI generated output before use and its release.
23. If you are in any doubt about the accuracy, including any bias of information generated by GenAI, you must not use GenAI.

## Confidentiality

24. Confidential and personal information must not be entered into an GenAI tool, as information may enter the public domain. You must follow all applicable data privacy laws and organisational policies when using GenAI.
25. If you have any doubt about the confidentiality of information, you must not use GenAI.

## Ethical Use

26. GenAI must be used ethically and in compliance with all applicable legislation, regulations and organisational policies. You must not use GenAI to generate content that is discriminatory, offensive, or inappropriate.
27. If there are any doubts about the appropriateness of using GenAI in a particular situation, you must consult with your manager or the Information & Data Governance Team.

## Disclosure

28. Content produced via GenAI must be identified and disclosed as containing GenAI-generated information.
29. **Footnote example:**
30. **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 full responsibility for this content.*

31. **If there are any doubts about the appropriateness of using GenAI in a particular situation, you should consult with your manager or the Information & Data Governance Team.**

## Risks and benefits of AI

32. **AI will always be considered if the public benefit outweighs the risks.**  
AI has the potential to improve and enhance productivity of public government services, and to make a positive impact on the lives of citizens, including:
33. **Service delivery, (efficiency and effectiveness) and cost avoidance:** AI can be used to automate tasks, such as processing paperwork and responding to customer inquiries as well as playing a role in drafting of a briefing or other correspondence. This can free up staff time to focus on more complex and rewarding work and in doing so avoid costs and provide greater use of resources, productivity and overall efficiencies.
34. **Decision-making and analytics:** AI can be used to analyse large amounts of data to identify trends and patterns, but significant care does need to be undertaken to ensure it is fair, transparent and reliable. This can help Public Authorities make better decisions about resource allocation, policy development, and service delivery. AI can help aid decision making (i.e. by providing information or analysis), as well as make decisions automatically. Automatic decision making will be part of a separate policy.
35. **Risk management:** AI can be used to identify and mitigate risks, such as fraud and corruption. This can help Public Authorities protect their assets and ensure the safety of their citizens.
36. **A catalyst for innovation:** It can encourage us to experiment in a safe, secure and lawful way and develop novel solutions to our wider objectives.
37. **Personalisation of a service to a customer:** Chatbots can be positive to enhance customer experiences and assist the customer services team in responding to generic queries.



38. **Outcomes:** Overall, AI could significantly support key outcomes so that *“Greater Manchester is a place where everyone can live a good life, growing up, getting on and growing old in a greener, fairer more prosperous city region”* (Greater Manchester Strategy).
- a. However, there are also some risks associated with the use of AI. These risks include:
    - b. **Bias:** Because AI relies on historical data, algorithms can be biased, which can lead to unfair treatment of certain groups of people.
    - c. **Data privacy and transparency:** There is a risk that data processing activities performed by AI solutions are not UK General Data Protection Regulation (GDPR), Data Protection Act 2018, Freedom of information Act 2000, Environmental Information Regulation 2004 and Equality Act 2010 compliant. This data must be protected to ensure the privacy of individuals. (Clear, Fair and transparent processing) and meet Equality & Diversity duties.
    - d. **Security:** AI is enabling more sophisticated cyber-attacks on public sector organisations including more subtle phishing attempts, deepfakes, automated malware attacks and so on.
    - e. **Unethical use:** There is a risk that AI use is not ethical in its approach, for example, in relation to the fairness of algorithmic decision making, or AI being used in procurement to generate tender responses that do not adequately reflect the capabilities of the tenderer.
    - f. **Job refinement:** AI could lead to changes in the requirements of particular roles, which requires remodelling of activities undertaken.
    - g. **Accuracy:** AI algorithms are not always accurate, built upon a flawed range of data being fed into the AI tool, or its insufficiently clear what input data has been used. An example would be inaccuracies in AI generated meeting minutes generated from audit translation transcriptions. All information generated must be reviewed and edited for accuracy prior to use. You are responsible for reviewing any output and accountable for ensuring the accuracy of generated output before

its use and release to others. If you have any doubt about the accuracy of information generated by AI, you must not use AI. All information generated is subject to the Freedom of Information Act 2000 and Environmental Information Regulations 2004, so it is vital that the information we hold is accurate and fit for purpose.

- h. **Lack of staff knowledge, understanding and training leads to inappropriate use of AI.** This impacts upon how AI is used in a safe, secure and lawful way.
- i. **Lack of Information Asset Management, ownership and intellectual property rights:** Careful consideration needs to be taken over what data is uploaded into an AI tool, who owns the data, and any protections expected by TfGM/GMCA or another party, including the outputs of the AI action. For example, existing copyright and Intellectual Property (IP) could be undermined (breach of contract) if data is uploaded into an AI solution.
- j. **Misinformation:** There is a risk that outputs are governed by threat actors (individuals who attempt to disrupt an organisation) who generate misinformation to the organisations that use the AI. This results in further disruption to that organisations' business processes.

## What is AI and Some Common Definitions

- 39. AI allows computers to learn and solve problems almost like a person. AI systems are trained on huge amounts of information and learn to identify the patterns in it, in order carry out tasks such as having human-like conversation, or predicting what may be the next action based on a historical pattern.
- 40. Terminology used in relation to generative AI can be confusing. Some common terms used when describing AI are detailed below and what they mean:

41. **Generative or Gen AI.** This refers to 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.
42. **GPT.** This is short for "generative pre-trained transformer", which is a type of Large Language Model 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.
43. **Hallucination.** LLMs can produce outputs which may initially appear to be believable but are in fact highly inaccurate or fabricated. This is known as a hallucination.
44. **Large language models (LLMs).** LLMs are a type of GenAI that can generate human like text in response to a prompt. They use deep learning techniques and massive data volumes to generate a response.
45. **Prompts.** These are the inputs or queries that as a user you provide to the GenAI application to receive the required output. Prompts can be used by the GenAI application to further train the LLM.

## Principles for the Appropriate Use of AI

46. Our guiding principle is that **AI will always be considered if the public benefit outweighs the risks.**  
The following principles must be followed when using AI:
47. **Governance and Transparency:** We will be transparent about the use of AI in our services. This includes disclosing the purpose and use of the AI, the data that is used to train the AI, and the algorithms that are used. AI models used must protect fairness and protect against bias.
48. **Accountability:** We will be accountable for the use of AI in our services. This includes having a process for auditing the use of AI, and for responding to complaints about the use of AI.

49. **Fairness, inclusion, diversity, equity:** AI must be fair and unbiased. This means that they must not discriminate against any group of people.
50. **Freely available:** AI tools which are freely available must be considered in line with the principles outlined within this section – in particular fair, transparent and ethical use.
51. **Privacy:** AI systems must protect the privacy of individuals. This means that they must only collect the data that is necessary for the purpose of the AI, and they must not share the data with third parties without the consent of the individual. This must be reflected in contracts and assurance processes with third parties that process data on our behalf.
52. **Security:** AI systems must be secure. This means that they must be protected from cyberattacks, and they must not be used to spread misinformation or propaganda. We will work to mitigate malicious use of AI against GMCA and TFGM and their democratic and governance processes.
53. **Leadership:** AI needs to be strategically led through a strategic commitment and endorsement to its fair and transparent use.
54. **Ethics:** AI and our approach in using AI must always remain ethical in its use.
55. **Staff confidence** – Staff must feel confident in its use and appropriate training provided.

# Appendices

## Related Information Sources:

56. [GenAI: eight questions that developers and users need to ask | ICO](#)  
[Thinking about the security of AI systems - NCSC.GOV.UK](#)
57. Office for Artificial Intelligence - GOV.UK ([www.gov.uk](http://www.gov.uk))
58. UK sets out proposals for new AI rulebook to unleash innovation and boost public trust in the technology - GOV.UK ([www.gov.uk](http://www.gov.uk))
59. Staff guidance is available on the corporate intranet