# General Purpose AI (Artificial Intelligence) Policy 2025 – 2026

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# Contents

## Policy statement

London Borough of Newham (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 to the Council's and residents' data.

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.

This policy should be read in conjunction with the following:

- Software Management Policy v1.0 Newham.pdf
- Data Protection Policy v1.0 Newham.pdf
- Data Protection Breach Policy.pdf
- Information Security Policy v2.5 - Newham.pdf
- Information Risk Management Policy v1 Newham.pdf
- Information Governance Framework 1.0 Newham.pdf
- ICT Code of Conduct.pdf
- I.T. Access Policy.pdf
- Data Classification Policy.pdf
- Cloud Management Policy v1.0 Newham.pdf
- BYOD Policy 2.14 Newham.pdf
- Access to Information Policy v2.4 Newham.pdf
- Acceptable Use Policy 1.2 Newham Council.pdf

The purpose of this policy is to set out the Council's position and 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.

## Scope

This policy applies to anyone who uses GenAI as part of their role at the council or on behalf of the Council – i.e. permanent staff, members, contractors, temporary workers, and agency staff.

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 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.

Users may only use GenAI applications for work-related purposes subject to adherence with this policy on Council devices.

This policy provides a framework for the procurement and use of such technologies by all Council employees. This policy will govern the way that AI should be used by the London Borough of Newham. It is designed to ensure compliance with all relevant legislation including; the Data Protection Act 2018, which implements the UK General Data Protection Regulations (UK GDPR), and the Equality Act 2010.

This policy will be reviewed and approved on a yearly basis by the Information Governance Board and updated as this technology develops.

General Purpose AI are machines designed to perform a wide range of intelligent tasks, think abstractly, and adapt to new situations. This policy applies to all available, approved corporate AI tools such as, but not limited to:

- Microsoft Copilot Chat
- Teams Premium
- Microsoft365 Copilot
- Microsoft Copilot Studio
- Chatbot's created by the Council
- Machine Learning in Power BI
- Beam Magic Notes

The policy also applies to non-corporate general-purpose AI tools such as, but not limited to:

1. Chat GPT
2. Google Gemini
3. External Chat bots
4. Facial recognition technology
5. AI assistant tools incorporated into applications such as Canva, Miro.

**IMPORTANT NOTE:**

Staff should note that Council data, whether it contains personal identifiable data or not, should **not** be entered into any unapproved general purpose AI tools described above. If in doubt, please contact the Council's Information Governance Team for advice on which tools have been approved. For avoidance of doubt, publicly available tools such as ChatGPT and Google Gemini should **never** be used with Council data.

## What is Artificial Intelligence (AI)?

Artificial Intelligence (AI) refers to computer systems capable of performing tasks that would normally require human intelligence. These systems can take many forms, and what is popularly considered as AI is continually evolving as AI technologies become more embedded in everyday human life. Some common forms of AI technology include algorithms and predictive analytics, chatbots and virtual assistants, Machine Learning (ML), remote monitoring tools, smart technologies, text editors and autocorrect, automatic language translation, and facial detection or recognition.

### How can I tell if my technology/project is using AI?

For some technologies, it is fairly obvious that they operate using AI, however this is not always the case. If you are unsure if a technology you are using or plan to use would be considered as AI, it may be helpful to consider the following:

- Does it support decision-making or make decisions?
- Does it support the delivery of information?
- Does it autonomously identify patterns in large volumes of data?
- Does it utilise Machine Learning, for example, learning to answer questions or solve problems?
- Does it predict or manage risks?
- Does it contribute to the allocation of resources or prioritisation of actions/investigations/inspections?
- Does it remotely monitor the well-being of individuals?
- Does it predict health problems at an early stage?
- Does it translate language?
- Does it analyse and/or act on data from its environment?
- Does it perceive and react to the world, for example, recognising visual information (e.g. objects, individuals) or speech?
- Does it store past data and predictions to inform future predictions?
- Does it remember, adapt or encourage changes to behaviour patterns?

If the answer to one or a few of the above is yes, then it is likely that the technology is using AI to operate, and you will therefore need to follow the procedures and considerations set out within this policy.

## Principles

5.1 **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.

5.2 **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.

5.3 **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.

5.4 **Accountability:** We all take responsibility for the outcomes of our GenAI systems and are open to feedback and accountability mechanisms from users and stakeholders.

5.5 **Continuous Improvement:** We will strive for continuous improvement in our GenAI technologies through research, development, and collaboration with experts in the field.

5.6 **Ethical Use:** We will adhere to ethical principles in the development and deployment of GenAI, avoiding harm to individuals, communities, or society.

5.7 **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.

5.8 **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.

5.9 **Regulatory Compliance:** We will comply with all relevant laws and regulations governing GenAI technologies.

## Permitted uses and applications

Council approved GenAI applications may be used for the following Council purposes:

- Supporting the finding of information within sites, folders, documents, messages or posts
- Supporting the production of draft documents
- Supporting the drafting of correspondence and presentations
- Supporting research
- Supporting the creation of document summaries
- Creating meeting summaries, notes, minutes and actions and other documents according to pre-defined templates
- Supporting generation of ideas
- Supporting data analysis
- Supporting decision making through summarisation of multiple documents and comparing to a policy or set of criteria
- Supporting the translation of languages
- Supporting learning by providing quick answers to questions using a pre-defined knowledge base

## IMPORTANT NOTE:

The above emphasis is on '*supporting', because* our staff have the responsibility and accountability to quality-check all AI generated outputs. All users should ensure outputs are accurate, compliant, and fit for purpose.

The following GenAI applications may be used for the above purposes:

- **Corporately provided Microsoft Copilot license**
    - If this has been allocated to you, you may search for information, generate text and images, and help partially automate administrative tasks. It is integrated with several applications including Microsoft 365 apps such as Word, Excel, Teams, PowerPoint, Outlook, and Power BI.

- **Copilot Chat (Web facing) Teams/Office.com/Microsoft Edge**
    - GenAI applications that only use publicly available information (although ethical and accuracy considerations will still apply).

- **Beam Magic Notes**
    - Smartphone based web app used for capturing face-to-face meetings notes, summaries and reports, for community-based use cases, used primarily in social care services

## Prohibited uses

Whilst the use of GenAI is permitted and encouraged by the Council when executed in a compliant way, some uses are strictly prohibited:

- Personal, special category or commercially sensitive data must not be submitted into any public GenAI application.

- AI tools, including GenAI, must not be used to undertake automated decision-making regarding individuals, nor for fully automating any part of the governance process within the Council.

- AI tools, including GenAI applications must not be used to create any form of legal documents.

- Any information that, if made public, may cause concern, breach the code of conduct, legislation or Council policy must not be entered into a public AI solution.

- GenAI must not be used to generate content that is discriminatory, offensive, inappropriate, or may cause embarrassment to the Council.

- GenAI must not be used to generate content that infringes the intellectual property rights of others, including but not limited to copyrighted material.

## Potential benefits

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 innovative 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 supporting the capture of conversations, decisions, actions, providing personalised care plans, education support plans, and the generation of assessments and reviews

## Risks

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

- Use of GenAI carries inherent risks. A comprehensive risk assessment must be conducted for any project or process where regular use of GenAI is proposed. The accountable Information Asset Owner (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 should be achieved through the completion of a Data Protection Impact Assessment (DPIA).

- Outputs can be made up, false, or misleading; these are commonly referred to as 'hallucinations.

    - In Copilot, constraints at the end of prompts can be used to prevent hallucinations; such as 'Be specific with the information provided, and only use information provided within this prompt as the source content.'

    - Copilot agents with a ring-fenced knowledge base prevent hallucinations but the source content needs to be structured in a very clear way – for example
        - Correct use of formatting styles, headers and indentations
        - Either do not use tables or ensure tables are very simple

    - More information can be found here:
        - How to Prevent Microsoft Copilot Hallucinations - Shelf

- Outputs can sometimes leave out key information.

- In Copilot, constraints at the end of prompts can be used to ensure more detailed outputs, such as: ‘Please do not omit information for brevity’.

- In Copilot, iterative prompting can also be used to obtain more detailed information from a transcript: i.e. ‘Keep this, but also provide more detail on…’

- Improve your prompting using the GCSE method to be more specific

- GenAI may make use of and generate biased, discriminatory, or offensive content.
  - To report biased, discriminatory or offensive output please
    - Notify line manager
    - Report via this web form
      - → AI Concerns Reporting Form

- Information that you input into GenAI software could be used for developing or training the AI model, creating risks to breaches to Council and resident data.

- Data entered GenAI applications may enter the public domain. Personal, special category or commercially sensitive information can be released without intention or accidentally. This could result in breaching regulatory requirements, customer or supplier contracts, or compromise intellectual property rights, 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.

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

**IMPORTANT NOTE:**

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

## Ethics

General purpose AI can gain their insights from the existing structures and dynamics of the societies and data sets they analyse, as well as the bias of their designers. As a result, they can reproduce, reinforce, and amplify patterns of marginalisation, inequality, and discrimination. The ethical justifications for using an AI tool to answer questions or improve a piece of work should be carefully thought out before use.

The Council will consider the Equality Impacts of all modern technologies procured and implemented at the Council. For all new technologies wanting to be implemented, staff will complete EqIAs (Equality Impact Assessments) to show how we have given due regard to the Public Sector Equality Duty.

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 via existing Council processes:

- **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.

## Governance, responsibilities, and requirements before use

All users remain accountable for their own use of GenAI and any outputs generated and used and must follow the below requirements before using GenAI:

- Before accessing new AI technology not approved by the Council, users must first notify the Council's Information Governance Team with the reason for use, the expected information to be inputted and the generated output and distribution of content. A DPIA may be required before the use of AI. Further guidance will be provided by the Information Governance team as well as sign posting for other internal Council processes (e.g. Procurement, Spend Control etc)

- Before implementing new AI technology, users must ensure that the solution goes through ICT's process for review and approval for use by the Council's Technical Design Authority (TDA). Start by contacting your ICT Business Relationship Manager

- Any file processed by an AI system such as Microsoft Copilot, must be stored on a Newham OneDrive, SharePoint site or Teams site.

- Users must adhere to copyright laws when utilising AI. If a user is unsure whether a particular use of AI constitutes copyright infringement, they should contact the Council's Legal team for advice on copyright laws

- Users must follow all applicable council policies when using AI. If a user has any doubt about the confidentiality of information, they should contact the Information Governance team.

- Users of AI are responsible for reviewing output and are accountable for ensuring the accuracy of AI generated output before use/release. If a user has any doubt about the accuracy of information generated by AI, they should check the data.

- Users must ensure that AI generated content is not discriminatory, offensive, or inappropriate. If there are any doubts about the appropriateness of using AI in a particular situation, users should consult with their supervisor or the Information Governance team.

- Any use of AI technology in pursuit of Council activities should be done with full acknowledgement of the policies, practices, terms, and conditions of the AI supplier.

However, to ensure compliance, appropriate use and safety, there are specific responsibilities related to some Council staff and teams:

- **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 Governance Team:** is responsible for providing advice on the use of personal and special category data in GenAI systems and software.

### IMPORTANT NOTE:

If you have any doubt about the ethics, lawfulness, or accuracy of outputs, copyright or confidentiality of information, do not use GenAI and report any serious concerns, either directly to the Information Governance or via this webform:

→ AI Concerns Reporting Form

## Environmental Impact

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

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 CO2. Training a single GenAI model can consume as

much as 284,000 litres of water. That is equivalent to the amount of water an average person would consume over the course of 27 years.

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 to start reducing it.

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.

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

## Training & support

To support their learning and skill development in monitoring these models and to build capacity within the organisation the Council will support delivery of training for those using AI. All project leads, managing a new AI technology will need to ensure they have completed mandatory UK GDPR (UK General Data Protection Regulation) training and Equality Impact Assessment training.

The AI Learning Hub has been launched on the Newham Intranet to be the central place where Newham staff can learn about AI and acquire new skills.

AI Learning Hub | Intranet

### External Support

- Guidance on AI and data protection | ICO
- Secure AI NCSC Guidelines
- Principles-for-the-security-of-machine-learning.pdf (ncsc.gov.uk)
- The UK AI Security Institute
- Principles of AI in policing
- Ada Lovelace Institute Foundation models Public Sector AI
- Alan Turing Institute Ethics and Governance in AI practice

## Further Guidance

Here are some resources and links to AI policies and frameworks from London local authorities:

1. **Data & AI Ethics Capabilities Framework - LOTI**: This framework provides guidance for councils on how to develop their ethics capabilities for data and AI use. It includes practical steps for ethical and responsible AI usage.
    a. Data & AI Ethics Capabilities Framework
2. **Artificial Intelligence Hub - Local Government Association (LGA)**: The LGA's AI Hub offers resources and guidance to help local authorities explore AI possibilities responsibly. It includes examples of AI implementation in local government and discusses the implications and challenges of AI adoption.
    a. Artificial Intelligence Hub
3. **Guidance on Generative AI - LOTI**: This guidance is aimed at local authority leaders to help them understand the basics of generative AI, its potential impact on councils, and how to mitigate associated risks.
    a. Guidance on Generative AI

# Policy & compliance

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

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.

Where evidence of misuse is found to have taken place a more detailed investigation may be undertaken in accordance with the Data Breach and Info Security Incident Policy v2.4 Newham.pdf) 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.

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. If 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.

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.

## Monitoring & review

The pace of development and application of GenAI is such that this policy will be under regular review at least once a year by the AI working group. Please send your feedback, suggestions, and experiences to the below web form to enable us to improve the policy and ensure it continues to meet the needs of the Council.

Submit feedback or a query

## Appendix

**Abbreviations**

- **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**

- **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 UK GDPRs apply to the processing of 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 UK residents' data, you must comply.
- **GenAI / 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 tool perceives 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