Dover District Council
AI Policy

Contents

Use of Generative Artificial Intelligence (AI)

Due to the use of AI in DDC being in its early stages, this policy takes a cautious approach to risks presented by the use of AI. This policy will be reviewed on a quarterly basis, to ensure the evolving capabilities and use cases of AI are considered, ensuring DDC regularly assesses emerging risks, but also is able to benefit from the technology.

1. Purpose

The purpose of this policy document is to provide a framework for the use of Generative Artificial Intelligence Large Language Model tools (collectively referred to in the rest of this document as GenAI) such as Microsoft Copilot, ChatGPT, Bard, Bing or other similar tools by council employees, contractors, developers, vendors, temporary staff, consultants or other third parties, hereinafter referred to as 'staff".

This policy is designed to ensure that the use of GenAI is ethical, complies with all applicable laws, regulations and council policies, and complements the council's existing information and security policies.

The pace of development and application of GenAI is such that this policy will be in a constant state of development.

GenAI can create realistic, human-like text, images, code and art based on huge amounts of (usually public) data it has been trained on.

- It can produce a range of useful outputs, like text, audio, images, and code
- Responds to natural language questions, so any employee can use it
- Is very good at understanding different types of data - useful given councils have large amounts of unstructured data in a large variety of formats.

2. Use

This policy applies to all staff using any GenAI tools, whether through council-owned devices or personal devices used for council activities. These tools can be embedded in other tools – such as email clients or video conferencing tools.

Use of GenAI must be in a manner that promotes fairness and avoids bias to prevent discrimination and promote equal treatment and be in such a way as to contribute positively to the council's goals and values.

Staff may use GenAI for work-related purposes if they adhere to this policy. This includes tasks such as generating text or content for reports, emails, presentations.

You must comply with this policy and the Council's Digital, Technology and Information Governance Policies when using GenAI tools.

2.1 Governance

When using GenAI tools, you must only use tools that have been approved by the council. The current list of approved GenAI tools is provided below.

Approved AI Tools	Personal Data Permitted	Who is Permitted
Microsoft Copilot (Work version only)	No	All Staff
Adobe Firefly	Images Vehicles Vehicle Registrations	Creative Services

If you would like to request the use of a GenAI website, tool or app that is not approved this will need to be reviewed and approved by Information Governance and Security teams. The teams will consider if the completion of a Data Protection Impact Assessment is required detailing the intention to use, the reason for use, and the expected information to be input as well as the generated output and distribution of content. It may also be necessary for a Technical Landscape Document (TLD) to be completed by the provider.

2.2 Vendors

Any use of GenAI technology in pursuit of council activities should be done with full knowledge of the policies, practices, terms and conditions of the developers or vendors of that tool. These must also be reviewed and approved by the council.

2.3 Copyright

Staff 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. If a staff member is unsure whether a particular use of GenAI constitutes copyright infringement, they should contact Legal Services or the Information Security team before using GenAI. For example, using GenAI to produce a logo could produce something based on a copy of a logo that is a trademark or is copyrighted.

2.4 Accuracy

GenAI can completely make up "facts". They will have ingested a large amount of data sources, some of which may be fiction. They also generate text that looks like real facts. It is important to fact check any content produced.

All information generated by GenAI must be reviewed and edited for accuracy prior to use. Users of GenAI are responsible for reviewing output and are accountable for ensuring the accuracy of GenAI generated output before use/release. If staff have any doubt about the accuracy of information generated by GenAI, they should not use GenAI without correction.

2.5 Confidentiality

Confidential and personal information must not be entered into a public GenAI tool (such as ChatGPT) or any other GenAI tool that has not been approved by the council. This is because the information will then enter the public domain and may be used for further training of the publicly available tool. Staff must follow all applicable data privacy laws and organisational policies when using GenAI. For example:

- Staff must not use an unauthorised GenAI tool to write a letter to a customer with any personal details in. For example: 'Mr A N Other at 123 Acacia Avenue' as that data will be ingested and kept by the GenAI for re-use.
- Staff must not use GenAI apps on personal phones to record and summarise work meetings, or to use translation services.
- Staff must not upload spreadsheets full of customer data for GenAI analysis.
- Staff must not use GenAI to make decisions on individual circumstances that result in automated decision making.

If staff have any doubt about the confidentiality of information or what will happen to the data they enter, they should not use that GenAI tool. Confidential or personal data should only be entered into a GenAI tool that has been built, procured and authorised specifically for Dover District Council use where the data entered is confined for the council's sole use and use of that tool has been specifically sanctioned for that purpose by the Information Governance and Security teams. So, for example, using Microsoft Teams with a council login to transcribe meetings is authorised. However, using a free tool downloaded to a personal phone to transcribe a work meeting is not authorised and could constitute a data breach and a breach of the council's wider Digital, Technology and Information Governance policies.

2.6 Social Impact and Equality

Staff must be aware of how the use of GenAI may impact different groups of people in different ways as it may have inherent social bias or have been trained on stereotypes. It may have inappropriate cultural values or display sensitive content. For example, GenAI must not be allowed to solely determine which customers should have access to services; Humans must be involved in such decision-making where needed, and there must be an appeal processes for any automated or AI-informed decisions as individuals have the right not to be subject to a decision based solely on automated processing, including profiling. The Council prohibits the use of GenAI for automated decision making on individuals using Gen AI to process personal data.

2.7 Ethical Use

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

3. Risks

Use of GenAI carries inherent risks. A comprehensive risk assessment should be conducted for any project or process where use of GenAI is proposed via a data protection impact assessment. The risk assessments should consider potential impacts including legal compliance; bias and discrimination; security (including technical protections and security certifications); and data sovereignty and protection.

GenAI may store sensitive data and information, which could be at risk of being breached or hacked. The council must assess technical protections and security certification of a GenAI tool before use. If staff have any doubt about the security of information input into GenAI, they should not use GenAI.

3.1 Legal compliance

Data entered into GenAI may enter the public domain. This can release non-public information and breach regulatory requirements, customer or vendor contracts, or compromise intellectual property. Any release of private/personal information could result in a breach of relevant data protection laws. Use of GenAI to compile content may also infringe on regulations for the protection of intellectual property rights. Staff should ensure that their use of any GenAI complies with all applicable laws and regulations and with council policies.

3.2 Data sovereignty and protection

While a GenAI platform may be hosted internationally, under data sovereignty rules information created or collected in the originating country will remain under jurisdiction of that country's laws. The reverse also applies. If information is sourced from GenAI hosted overseas, the laws of the source country regarding its use and access may apply. GenAI service providers should be assessed for data sovereignty practice by any organisation wishing to use their GenAI.

4. Compliance

Any violations of this policy should be reported to the council's Information Governance Team. Failure to comply with this policy may result in disciplinary action, in accordance with council's disciplinary policy and procedures.

5. Review

This policy will be reviewed periodically and updated as necessary to ensure continued compliance with all applicable legislation, regulations and organisational policies.

6. Acknowledgement

By using GenAI, staff acknowledge that they have read and understood these guidelines, including the risks associated with the use of GenAI.

Document Control	
Title/Version - AI Policy 2.0 **Owner** - Dover District Council **Date Approved** - 05/02/2025 **Review Date** - 05/02/2026	

Revision History			
Revision Date	**Reviewer(s)**	**Version**	**Description of Revision**
27/06/2025	███████	2.0	Added Adobe Firefly