



Use of Artificial Intelligence Policy

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Our Vision, Our Values, Our Strategic Objectives

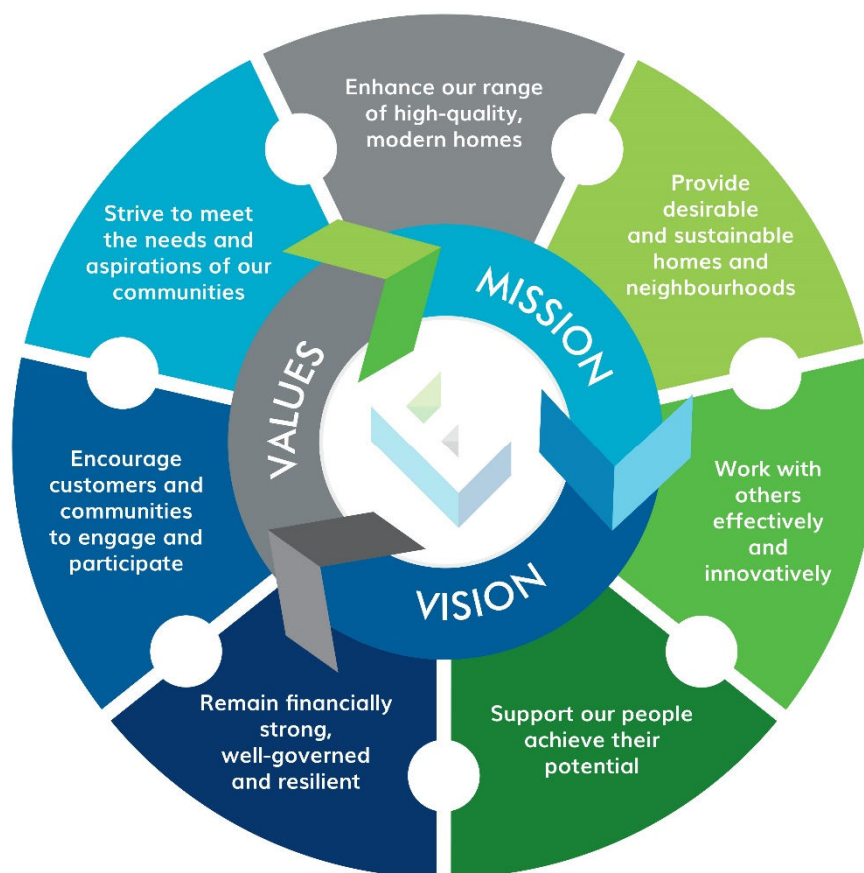
Our Vision

A vibrant neighbourhood where everyone can prosper.

Our Values

Caring, Reliable, Fair, Open and Adaptable

Our Strategic Objectives



Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

Executive Summary

Policy Author

This policy has been developed by the Corporate Governance Manager and sits within the IT suite of policies. Responsibility for the implementation and oversight sits with the Management Team, and review responsibilities sit with the Corporate Governance Manager.

Purpose of the Policy

This policy outlines the acceptable use of Generative Artificial Intelligence (GenAI) technologies within Elderpark Housing.

Aims and Objectives of the Policy

This policy aims to clarify the Association's position on the use of Artificial Intelligence, including what is deemed to be acceptable and unacceptable use, as well as how the Association will oversee and monitor the use of AI as the technology develops.

Legislative and Regulatory Compliance

This policy has been written in compliance with the following legislation:

- UK GDPR & Data Protection Act 2018
- The Equality Act 2010
- Human Rights Act 1998

As a Registered Social Landlord (RSL) the Association must also comply with the Scottish Housing Regulator's (SHR) Regulatory Framework, including the seven Standards of Governance and Financial Management and the Scottish Social Housing Charter.

Relevant to this policy from the Standard of Governance and financial Management is:

Regulatory Standard 2 (RS2) – 'The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.'

Regulatory Standard 4 (RS4) – 'The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose'.

Relevant to this policy from the Scottish Social Housing Charter:

- Outcome 1 – equalities
- Outcome 2 – communication
- Outcome 3 - participation

Equalities

This policy has been written taking consideration of the Equality Act 2010 and an Equality Impact Assessment has been carried out to ensure that necessary controls are in place to mitigate risk to protected groups from the use of AI.

Privacy

This policy will ensure that data security is a primary consideration in all use of AI and a data impact assessment has been carried out.

Related Policies

Policy Title	Location
Data Retention Policy	Data Retention policy
Equality, Diversity and Inclusion Policy	Equality, Diversity and Inclusion Policy
Risk Management Policy	Risk Management Policy
Data Protection Policy	Data Protection Policy

Contents Page

1	Introduction	Page 6
2	Purpose of the Policy	Page 6
3	Scope and Legislative Framework	Page 6
4	Position Statement	Page 7
5	Types of Artificial Intelligence	Page 7
6	Acceptable Use	Page 8
7	Prohibited Use	Page 8
8	Data Privacy and Security	Page 9
9	Transparency	Page 9
10	Accountability and Oversight	Page 9
11	Intellectual Property	Page 10
12	Training and Awareness	Page 10
13	Identification and testing of potential AI usage	Page 10
14	Reporting	Page 11
15	Review	Page 11

Appendices

Appendix 1	
Equality Impact Assessment	Page 12
GDPR Impact Assessment	Page 13

1 Introduction

- 1.1 Generative Artificial Intelligence (AI) is changing the way we work, learn and create. Generative AI is currently the main type of artificial intelligence that most people in both work and home settings are using (or considering using) to create new content such as text, images, code, and music based on user prompts.

It learns from vast datasets and uses that information to generate specific outputs—ranging from answering questions and summarising information to creating art and writing stories. It has potential to automate simple tasks to allow staff to spend more time working with our customers to create real and lasting impact.

- 1.2 It is however a new and fast changing technology that is also still learning, and it must be adopted cautiously with full awareness of its limitations and the potential issues that this can cause.

2 Purpose of this Policy

- 2.1 The purpose of this policy is to clarify the Association’s position on the use of AI within the organisation.
- 2.2 This policy will outline what is considered acceptable and prohibited use of AI, how AI use will be assessed before implementation, monitored after implementation and the role of data security in the use and implementation of AI tools and products.

3 Scope and Legislative Framework

- 3.1 This policy applies to the following people who use GenAI tools in the course of their work with Elderpark Housing:
- Employees (permanent and temporary)
 - Contractors
 - Consultants
 - Committee members
 - Third party providers
- 3.2 This Policy complies with legislation set out in the Equality Act 2010 as set out in our Equality and Diversity statement at the start of this policy, the UK GDPR & Data Protection Act 2018, and the Human Rights Act 1998.
- 3.3 Elderpark Housing is regulated by The Scottish Housing Regulator (SHR), established on 1 April 2011 under the Housing (Scotland) Act 2010. Their Regulatory Framework 2019 sets out seven Standards of Governance and Financial Management. Relevant to this Policy are:

- **Regulatory Standard 2** – *‘The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.’*
- **Regulatory Standard 4** - *‘The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation’s purpose’.*

3.4 The Scottish Governments Social Housing Charter came into force in April 2012. The Scottish Social Housing Charter states what tenants can expect from social landlords, in terms of the quality and value for money of the services they receive, the standard of their homes, and opportunities for communication and participation in the decisions that affect them. This policy aims to ensure we meet the Charter standards and outcomes, in particular:

- **Outcome 1: Equality** – *‘Social landlords perform all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.’*
- **Outcome 2: Communication** – *‘Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.’*
- **Outcome 3: Participation** – *‘Social landlords manage their business so that tenants and other customers are offered a range of opportunities that make it easy for them to participate in and influence their landlord’s decisions at a level they feel comfortable with.’*

4 Position Statement

4.1 Elderpark Housing Association aims to promote AI as a positive platform to enhance the work of Employees and Management Committee by setting direction and communicating boundaries for its use whilst protecting organisational data and maintaining the human element of decision making and intervention.

5 Types of AI

5.1 Due to the fast-moving nature of AI development, this policy will not designate AI tools approved or unapproved, however it does differentiate between integrated/in-house and publicly available/free AI tools, and these differences are highlighted below:

- **In-house GenAI tools:** These are AI-enabled services integrated within internal systems and applications and managed under its IT security protocols. Examples include Microsoft 365 Copilot, Copilot Chat, and other AI services within secure

cloud data-centres. These tools operate under organisation governance controls, including access security, identity management and data retention policies.

- Publicly Available and free GenAI tools: These are commercial, web-based AI platforms accessible over the internet that operate on shared infrastructure not managed or administered internally at Elderpark Housing Association. Examples include ChatGPT (OpenAI), Microsoft Copilot (personal), Google Gemini, Anthropic Claude, xAI, Perplexity, and other services. These tools do not comply with organisation security standards and present higher risks related to data handling, privacy, and reliability meaning they are more likely to cause a data breach or cyber incident

5.2 Given the additional security measures inherent in integrated AI systems, staff should always seek to use in-house GenAI systems as standard. Use of publicly available tools is discouraged as this can expose the association and the employees themselves to risk and ultimately have an adverse impact on the business. Where it is considered that the use of a Publicly Available and free GenAI tool would provide business benefits to the association then a risk assessment may be carried out in line with an agreed approach.

6 Acceptable Use

6.1 It is recognised that this is a fast moving and evolving technology that it is difficult to quantify the future capabilities it may have, so the association has taken the approach of outlining guidance on acceptable and prohibited use, rather than stipulate specific tools. The use of generative Artificial Intelligence is permitted for:

- Drafting simple/repetitive/acknowledgement communications, summarising documents, creating simple draft reports based on Elderpark Housing Association template documents and polices.
- Data analysis and visualisation
- Research, evidence gathering and investigation
- Enhancing customer service (e.g., approved, vetted, and established in-sector chatbots)
- Automating repetitive tasks
- Supporting data driven decision-making with insights
- Getting advice and support on topics

7 Prohibited Use

7.1 Artificial Intelligence must not be used for:

- Generating or sharing sensitive personal data without explicit consent
- Making autonomous decisions that affect tenants or staff without human oversight
- Generating communications to tenants that are impersonal and vague with no human intervention

- Drafting complex communications to tenants – i.e. legal notices or any other types of communications that will confuse individuals with excessive amounts of information drawn from multiple sources
- Creating biased, discriminatory, or offensive content
- Generating content that could be misleading or misrepresentative of Elderpark Housing Association’s mission, values, or policies
- Circumventing legal, regulatory, or contractual obligations
- Any activity that violates data protection laws (e.g., GDPR)
- Impersonating any member of staff, board member, supplier of goods and services or a customer
- Creating images of people using AI

8 Data Privacy and Security

8.1 The privacy and security of data is of paramount importance to the association as it adopts AI to working practices. In order to ensure tenant and customer data is protected:

- Users must not input personally identifiable information (PII), financial data, or confidential tenant information into publicly available GenAI tools. **The input of personally identifiable information (PII), financial data, or confidential tenant information into public GenAI tools will be considered a reportable breach in accordance with GDPR** and a breach of this policy.
- When using integrated AI systems, staff should also avoid the inclusion of personally identifiable information wherever possible
- All data processed by AI must comply with Elderpark Housing Association’s Data Protection Policy and GDPR requirements.

9 Transparency

9.1 Users should clearly indicate when content has been wholly generated by AI to maintain transparency, it is not envisaged that staff will use AI to wholly generate content on a regular basis, but creation of images may be an example where AI would be used.

10 Accountability and Oversight

10.1 Users are responsible for verifying the accuracy and appropriateness of GenAI-generated content.

10.2 Managers must ensure staff are trained in GenAI usage and understand the risks and limitations.

10.3 An in-house AI Review Panel team will conduct periodic audits of AI usage to include bias and hallucination detection. This involves reviewing outputs for signs of bias,

where the AI may reflect unfair or prejudiced assumptions, and hallucinations, where the AI generates false or misleading information that appears plausible but lacks factual basis. These audits help ensure responsible, accurate, and equitable use of AI tools

- 10.4 Individual staff are responsible for checking, and accountable for, the generated content they produce using AI. All outputs must be reviewed by staff before use.

11 Intellectual Property

- 11.1 AI-generated content may be subject to copyright or licensing restrictions. Users must ensure proper attribution and usage rights in accordance with copy right restrictions, this extends to all media such as audio, video, photographs and text
- 11.2 Elderpark Housing Association retains ownership of AI-generated content created for business purposes.

12 Training and Awareness

- 12.1 All staff must complete mandatory training on GenAI usage on risks, legal and ethical considerations before integrating these tools into their daily working practices.

13 Identification and testing of potential AI usage

- 13.1 Whilst AI can make positive changes to the way we work, adoption of AI tools and practices must be careful and considered. To do this, Elderpark Housing will convene an in-house AI Review Panel that will assess proposals for large scale AI usage to ensure that they are necessary, proportionate and align with our values and data security priorities before they are embedded in working practice.

The panel ensures responsible adoption by assessing compliance, risk, and alignment with organisational values. This process safeguards data, promotes ethical innovation, and maintains transparency, accountability, and strategic consistency across all AI activities.

Where there is a degree of complexity external advice may be sought from a specialist consultant to assist the AI Review Panel in making an informed decision.

The below provides a high-level outline of the AI Review process.

- All new large scale AI use cases must be formally proposed before implementation. Any AI use that will involve personal and sensitive data, regardless of scale, will also be subject to this process.

- Staff to submit a written proposal detailing the intended use, benefits, data requirements, and potential risks.
- Proposals will be reviewed by AI Review Panel, which includes members from IT, Corporate and the relevant operational teams.
- The AI Review Panel assesses each proposal for alignment with organisational values, legal and regulatory requirements, data protection standards, and risk appetite.
- The review process includes technical due diligence, ethical impact assessment, and stakeholder consultation.
- Only use cases meeting standards for security, transparency, and accountability are approved for deployment
- The AI Review Panel will document its decision and provides feedback to the proposer, ensuring a clear audit trail and ongoing oversight of AI activities.

14 Reporting

- 14.1 Any misuse or suspected breach of this policy must be reported to the IT team immediately.
- 14.2 Employees are encouraged to report any concerns or issues related to the use of GenAI tools in the workplace as this helps in identifying potential training issues/development areas early and enables Elderpark Housing Association to address them proactively.
- 14.3 Breaches may result in disciplinary action in accordance with Elderpark Housing Associations HR policies.

15 Review

- 15.1 This policy will be reviewed every 3 years, or beforehand should legislative or other changes make earlier review appropriate.

Appendix 1

Equality Impact Assessment

Name of Policy to be assessed	Use of Artificial Intelligence Policy	New policy or revision of existing?	New
Person(s) responsible for assessment		Corporate Governance Manager	
1. Briefly describe the aims, objectives and purpose of the policy.	This policy is designed to outline the approach and parameters for the use of Artificial Intelligence within the association.		
2. Who is intended to benefit from the policy? (e.g applicants, tenants, staff, contractors)	The policy applies to staff and committee, therefore making clear expectations of them will benefit them, and the proper and considered use of tenant information is beneficial to tenants also.		
3. What outcomes are wanted from this policy? (e.g the measurable changes or benefits to members/ tenants / staff)	Clear boundaries and guidance for the use of Artificial Intelligence within Elderpark Housing Association.		
4. Which groups could be affected by the policy? (note all that apply)			
Age	✓	Disability	✓
Gender reassignment	✓	Marriage and Civil Partnership	✓
Pregnancy and Maternity	✓	Race	✓
Religion or Belief	✓	Sex	✓
Sexual Orientation	✓		
5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.			
6. Have those affected by the policy / decision been involved?			
This policy could have an impact on all staff and service users, therefore careful consideration has been given to its impact to mitigate any possible negative impacts.			
7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.	Positive Impact(s)		Negative Impact(s)
			AI relies on the data it receives and can develop bias, which could impact any group identified above
8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	There must be human checks and oversight on all AI outputs, AI will not be relied upon to make decisions autonomously and humans must sign off on any decisions that have been assisted by the technology		
Signed:		Julie-Ann Cloherty	
Dated:		23.03.2026	

GDPR Impact Assessment

Name of Policy to be assessed	Use of Artificial Intelligence Policy	New policy or revision of existing?	New
Person(s) responsible for assessment		Corporate Governance Manager	
Briefly describe the aims, objectives and purpose of the policy.	This policy is designed to outline the approach and parameters for the use of Artificial Intelligence within the association.		
Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)	This policy makes clear that personal and sensitive data should be removed when using AI. If personal and sensitive data is entered into a public AI system, this is considered a data breach		
What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)	Clear boundaries and guidance for the use of Artificial Intelligence within Elderpark Housing Association.		
Which groups could be affected by the policy? (note all that apply)			
Tenants	√	Committee	√
Employees	√	Contractors	√
If the policy is not relevant to any of the data groups listed above, state why and end the process here.			
Have those affected by the policy / decision been involved?			
This policy could have an impact on all staff and service users, therefore careful consideration has been given to its impact to mitigate any possible negative impacts.			
Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.	Positive Impact(s)	Negative Impact(s)	
	AI could allow for quicker, more responsive and personalised service from systems.	Should personal information be entered into public AI, this information is irretrievable and could be used or reproduced by the system at a later date	
What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	There will be stringent monitoring and auditing of AI use and outputs, and use of public AI systems is strongly discouraged due to security concerns. Personal data will only be used with AI where it is a closed system.		
Signed:	Julie-Ann Cloherty		
Dated:	23.03.26		

