

Comprehensive Internal AI Policy

This policy sets out how our organisation will adopt, develop, and use Artificial Intelligence (AI) in a responsible and ethical manner. It applies to all staff, trustees, and volunteers, and covers any AI initiative undertaken within the organisation. By following this policy, we aim to protect the rights and interests of members, supporters, and other stakeholders, while harnessing AI for positive impact.

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1 Purpose and Scope

Purpose: To ensure that AI is used in ways that align with our charitable objectives, respect individual rights, and maintain public trust in our organisation.

Scope: Applies to all staff, trustees, and volunteers who design, procure, implement, or manage AI systems as part of their role.

2 Definitions

Artificial Intelligence (AI): Systems or technologies capable of tasks that typically require human intelligence, such as reasoning, learning, or decision-making.

Personal Data: Information that identifies or could identify an individual, such as a name, contact details, or membership records.

Sensitive Data: Special category information like health or demographic data that requires heightened protection under law.

Data Protection Impact Assessment (DPIA): A process for identifying and minimising the data protection risks of a project.

3 Guiding Principles

Member-Centric: AI use should support our charitable objectives and benefit members or supporters.

Transparency: Clearly communicate when and how AI is used, particularly if it impacts individuals' rights or choices.

Fairness and Inclusion: Avoid biases or discriminatory outcomes by designing AI to be fair and accessible.

Privacy and Data Protection: Respect privacy rights and comply with relevant data protection laws, including the UK GDPR.

Accountability: Maintain clear governance structures, define responsibilities, and ensure proper oversight for all AI projects.

Continuous Improvement: Stay informed of best practices and evolving legislation and update our policies and processes accordingly.

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4 AI Usage Guidelines

4.1 Acceptable AI Applications

Relevant to Our Mission: Any AI project must align with our organisational values and charitable objectives.

Supported by a Business Case: All new AI initiatives must demonstrate potential benefits for the organisation, its members, or supporters.

4.2 Prohibited Practices

Unlawful or Unethical Uses: AI must not be used in ways that break the law, compromise data rights, or conflict with our organisational values.

Sharing Sensitive or Confidential Data: No personal or sensitive information should be uploaded to publicly hosted AI platforms without explicit approval from IT and completion of a DPIA.

Unapproved Automated Decisions: Do not rely on AI-driven automated decisions affecting individuals' rights or access to services without explicit authorisation from senior management.

5 Data Collection and Processing

5.1 Minimal and Lawful Collection

Collect and process only the data strictly necessary for the purpose of the AI project.

Establish a lawful basis for using personal or sensitive data, such as consent or legitimate interest, in line with legal requirements.

5.2 Data Protection Measures

Ensure compliance with the UK GDPR and other relevant laws, including the conduct of DPIAs for high-risk projects.

Adopt secure data storage and transfer methods. Consult IT for approved tools and platforms.

Use anonymised or pseudonymised data whenever possible to reduce privacy risks.

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6 Security and Risk Management

6.1 Security Controls

AI systems and data must be protected by robust security measures, including encryption, user access controls, and regular security assessments.

Report any security weaknesses or breaches immediately to IT and your line manager.

6.2 Risk Assessment

Conduct a thorough evaluation of potential ethical, privacy, or security risks before launching an AI project.

Use existing risk checklists or frameworks to guide this process, and maintain documentation for audit purposes.

7 Governance and Oversight

7.1 Approval Process

All new AI initiatives must be logged with IT, who will review feasibility, security, and compliance requirements.

Major projects that could have significant impact on personal data or ethical considerations may require additional approval from a governance or ethics committee.

7.2 Monitoring and Accountability

IT and the Data Protection Lead will maintain a register of AI tools in use.

Regular audits and reviews will be carried out to ensure AI projects continue to meet compliance and ethical standards.

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8 Free vs. Paid AI Platforms

Free Platforms: Typically do not guarantee data confidentiality or ownership and may store user inputs to train their models.

Paid Platforms: Often offer stronger data protection measures, backed by contractual agreements.

Key Rule: No sensitive or personal data must be shared with any AI platform, free or paid, unless it has been approved for such use following an appropriate risk assessment and DPIA.

9 Roles and Responsibilities

Staff and Volunteers:

Follow this policy and seek guidance if unsure.

Complete any required training on data protection and AI ethics.

Report concerns, incidents, or policy breaches promptly.

Trustees:

Provide strategic oversight and ensure that AI use aligns with the organisation's mission.

Support an environment that values ethical and compliant AI innovation.

IT Department:

Evaluate and approve AI solutions, maintain an AI tools register, and advise on security measures.

Offer training and support to staff and volunteers.

Data Protection Lead:

Provide specialist advice on privacy and data protection compliance.

Lead or coordinate DPIAs for projects involving personal data.

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Governance/Ethics Committee (where applicable):

Review high-impact AI initiatives and offer guidance on ethical implications.

Ensure ongoing compliance with organisational values and external regulations.

10 Training and Awareness

Staff, trustees, and volunteers must receive periodic training on AI principles, data protection, and privacy.

Updates on policy changes, new AI tools, or revised legal requirements should be communicated promptly.

11 Compliance and Enforcement

Failure to follow this policy may lead to disciplinary action under our internal procedures.

Serious breaches involving personal data misuse may result in legal consequences, both for individuals and the organisation.

The organisation reserves the right to monitor AI usage and to investigate suspected violations of this policy.

12 Reviews and Updates

This policy will be reviewed regularly to remain up to date with evolving AI technologies, best practices, and legal requirements.

Feedback from staff, trustees, volunteers, and members will be considered to improve and refine our AI practices.

By adhering to this AI Policy, our organisation seeks to embrace innovation while respecting individual rights, safeguarding sensitive data, and maintaining the trust of our members, supporters, and the wider community.

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