

AI ACCEPTABLE USE POLICY

APPROVED BY HHP BOARD:
EFFECTIVE DATE:



hebridean housing
partnership

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INTRODUCTION

- 1.1 This policy outlines the acceptable use of Generative Artificial Intelligence (GenAI) technologies within HHP.
- 1.2 This policy applies to all Board Members, employees (including temporary staff and students) and organisations acting on our behalf. It applies to all locations where information and data are accessed and used.
- 1.3 AI usage must be assessed for potential equality impacts to ensure compliance with the Public Sector Equality Duty and avoid disproportionate impacts on protected groups.

AIMS

- 2.1 The Policy aims to ensure responsible, ethical, and secure use of Generative AI tools to support operational efficiency, innovation, sustainability, and service delivery.
- 2.2 GenAI 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. Its benefits include increased productivity, creative support and the ability to automate repetitive tasks, freeing up time for higher-value work. However, its output may not always be accurate and can contain biases arising from the data used, so it's crucial to review generated content critically to ensure fair and representative content is used.

OUR GENERATIVE AI POSITION STATEMENT

- 3.1 The below details our Generative Artificial Intelligence position statement. This statement defines our responsible, ethical, transparent and strategic principles, that guide our organisational adoption, governance, and use of generative AI.

“HHP aims to promote AI as a positive platform to enhance the work of staff and Board in the workplace by setting direction and boundaries for its use while maintaining the human element of decision making and intervention. AI usage must uphold fairness, avoid bias and reflect our commitment to equality, diversity and inclusion”

APPROVED TOOLS

- 4.1 Only GenAI tools approved by Executive Team and IT Corporate Resources Manager may be used.
- 4.2 The policy governs GenAI usage across all work environments, including both offices and any remote or hybrid arrangements.
- 4.3 This policy encompasses both:

In-house GenAI tools: These are AI-enabled services integrated within internal systems and applications and managed under our 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. 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.

4.4 Our approved tools are listed below:

- Microsoft Copilot (Enterprise or approved version)
- Canva AI
- Adobe AI

4.5 This approved list may be added to as business needs, technology capabilities, and organisational risk assessments evolve. Any additions will be subject to review and approval by the Executive Team and Corporate Resources Manager to ensure compliance with security, governance, and data protection requirements.

ACCEPTABLE USE

5.1 Approved GenAI tools may be used for:

- Drafting simple/repetitive/acknowledgement communications, summarising documents, creating simple draft reports based on our documents and policies.
- Data analysis and visualisation
- Enhancing customer service (e.g., approved, vetted and established in sector chatbots)
- Automating repetitive tasks
- Supporting data driven decision-making with insights

5.2 All outputs must be checked for potential bias or equality impacts prior to use in decision making.

PROHIBITED USE

6.1 GenAI tools 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 our 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

6.2 GenAI must not be used to generate or support any decision that may disproportionately disadvantage individuals with protected characteristics.

DATA PRIVACY & SECURITY

7.1 Protecting data privacy and security is crucial when users enter information into AI systems.

- Users must not input personally identifiable information (PII), financial data, or confidential tenant information into public GenAI tools. For the avoidance of doubt only those listed on the 'Approved List' at Para 4.4 should be used. The input of PII, financial data or confidential tenant information into public GenAI tools will be

considered a reportable breach in accordance with GDPR regulations and a breach of the Gen AI Acceptable Usage policy.

- All data processed by GenAI must comply with our Privacy Policy and GDPR requirements.
- Only GenAI technologies listed in the approved section of this policy can be used for work purposes and must comply with all applicable laws and regulations, for example UK General Data Protection Regulations, Data Protection Act 2018 ISO/IEC 42001:2023 and/or the EU AI Act 2027.

7.2 If GenAI tools unintentionally generate or expose PII this must be reported immediately to the Data Protection Officer as a data incident.

TRANSPARENCY

8.1 Users should clearly indicate when content has been wholly generated by GenAI to maintain transparency.

ACCOUNTABILITY & OVERSIGHT

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

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

9.3 Managers should conduct periodic audits of GenAI 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.

- 9.4 Individual staff are responsible for checking the generated content produced by GenAI. All outputs must be reviewed by staff before use in critical decisions or external communications.

INTELLECTUAL PROPERTY

- 10.1 GenAI content may be subject to copyright or licensing restrictions. Users must ensure proper attribution and usage rights in accordance with copyright restrictions. This extends to all media such as audio, video, photographs and text.
- 10.2 HHP retains ownership of GenAI generated content created for business purposes.

TRAINING & AWARENESS

- 11.1 All staff must complete mandatory training on GenAI usage, risks, legal and ethical considerations before using these tools.

Breathe Module – Ethical AI for business writing

My1HS – AI Awareness

Refresher training will be provided annually.

REPORTING & ENFORCEMENT

- 12.1 Any misuse or suspected breach of this policy must be reported to the IT team immediately.
- 12.2 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 us to address them proactively.

12.3 Breaches may result in disciplinary action in accordance with our HR policies.

RELATED POLICIES & DOCUMENTATION

13.1 This policy should be used in conjunction with the following documents:

- IT Security Policy
- Communication Policy
- Openness & Confidentiality Policy
- Privacy Policy
- Use of AI Guidelines
- Equality & Diversity Policy
- Digital Transformation Policy

MONITORING AND REVIEW OF POLICY

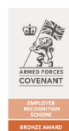
14.1 This policy will be reviewed every year and unless legislation, business or sector developments require otherwise to ensure it meets the stated objectives and takes account of best practice development.

INTERPRETATIONS & ABBREVIATIONS

The following interpretation and abbreviations are used in this policy:

WORD	INTERPRETATION
<i>HHP or Partnership</i>	Hebridean Housing Partnership
<i>Board</i>	Means the Board of the Hebridean Housing Partnership
<i>Board Members</i>	All Members of the Board including co-opted Members
<i>Accountability</i>	The obligation of individuals and teams to ensure AI tools are used responsibly and in compliance with policy and regulations.
<i>Approved Tools</i>	AI platforms and applications that have been vetted and authorised by the IT department for use within the organisation.
<i>Bias</i>	Artificial Intelligence systems, and the use of structured collections of data used to train, validate, and test these and machine learning (ML) models
<i>EU AI Acct</i>	A forthcoming European regulation establishing requirements and standards for the safe and ethical use of artificial intelligence
<i>Generative Artificial Intelligence (GenAI)</i>	AI systems capable of producing text, images, or other content based on input prompts. GenAI tools can automate tasks, generate communications, and provide insights to support operational efficiency and innovation.
<i>GDPR</i>	General Data Protection Regulation
<i>Hallucination</i>	When an AI system generates content that is factually incorrect, misleading or not based on real data
<i>Human Oversight</i>	The requirement that all critical decisions or external communications generated by AI must be reviewed by a human before implementation
<i>In house GenAI Tools</i>	AI-enabled services integrated within the organisation's systems and managed under its IT security protocols. These tools operate within the secure cloud tenant, governed by identity

WORD	INTERPRETATION
	management and data retention policies (e.g., Microsoft 365 Copilot, Copilot Chat).
<i>Intellectual Property</i>	Legal rights that protect creations of the mind, such as inventions, literary and artistic works, and symbols, names, and images used in commerce.
<i>ISO/IEC 42001:2023</i>	An international standard for AI management systems, outlining requirements for responsible governance, risk management, and lifecycle oversight of AI technologies.
<i>Personally Identifiable Information (PII)</i>	Any data that can be used to identify an individual, such as names, addresses, contact details, financial information, or tenant records. PII must not be entered into public GenAI tools.
<i>Publicly Available GenAI Tools</i>	Commercial, web-based AI platforms accessible over the internet that operate on shared infrastructure not controlled by the organisation. These present higher risks related to data handling, privacy, and reliability (e.g., ChatGPT, Google Gemini, Anthropic Claude)
<i>Transparency</i>	Openness in how Gen AI tools are used including clear communication when AI content is generated
All references to the masculine gender in this policy shall read as equally applicable to the feminine gender	



HHP is a registered society under the Co-operative and Community Benefit Societies Act 2014, Registered Number: 2644R(S), Registered Office: Creed Court, Gleann Seileach Business Park, Willowglen Road, Stornoway, Isle of Lewis HS1 2QP. It is a charity registered in Scotland, Charity Number: SC035767, registered as Registered Social Landlord with the Scottish Housing Regulator, Registration Number: 359 and registered as a Property Factor, Registration Number PF000183

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