AGENDA MANAGEMENT SHEET

Report Title:	Establishing principles governing the usage of Artificial Intelligence at Rugby Borough Council.
Name of Committee:	Cabinet
Date of Meeting:	7 October 2024
Report Director:	Chief Officer Digital and Communications
Portfolio:	Growth & Investment, Digital & Communications
Ward Relevance:	None
Prior Consultation:	None
Contact Officer:	Dr. Thomas David Griffiths Chief Officer – Digital & Communications Thomas.Griffiths@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	No
Corporate Priorities: **(C) Climate** **(E) Economy** **(HC) Health and Communities** **(O) Organisation**	This report relates to the following priority(ies): ☐ Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C) ☐ Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E) ☐ Residents live healthy, independent lives, with the most vulnerable protected. (HC) ☒ Rugby Borough Council is a responsible, effective and efficient organisation. (O) [Corporate Strategy 2021-2024](#) ☐ This report does not specifically relate to any Council priorities but
Summary:	The purpose of this report is to include a copy of the new Artificial Intelligence tooling and generative models Policy, outlining the governance processes to ensure the tools are used responsibly and data is kept secure.

Financial Implications: There are no Financial Implications arising directly from this report.

Risk Management/Health and Safety Implications: There are no risk management implications arising directly from this report.

Environmental Implications: There are no environmental implications arising directly from this report.

Legal Implications: There are no legal implications arising directly from this report.

Equality and Diversity: There are no Equality and Diversity implications arising directly from this report.

Options:

Recommendation: IT BE RECOMMENDED TO COUNCIL THAT the 'Governing the use of Artificial Intelligence tooling and generative models policy be approved and adopted across Rugby Borough Council to ensure prompt and effective governance of AI-assisted technologies.
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Reasons for Recommendation: To ensure the secure and managed usage of AI across Rugby Borough Council.

Cabinet - 7 October 2024

Establishing principles governing the usage of Artificial Intelligence at Rugby Borough Council

Public Report of the Chief Officer Digital and Communications

Recommendation
IT BE RECOMMENDED TO COUNCIL THAT the Artificial Intelligence tooling and generative models policy be approved and adopted across Rugby Borough Council to ensure prompt and effective governance of AI-assisted technologies.

1. INTRODUCTION

1.1 With the increased usage of Artificial Intelligence across both the public and private sectors, Rugby Borough Council will establish a risk-based governance framework, encouraging usage of AI-assisted technology across the Council.

1.2 Artificial Intelligence is a broad term which can be used to describe a range of software systems and technologies. For this paper, and the associated Artificial Intelligence Usage Policy, the following definitions and scope are provided.

1.2.1 **Artificial Intelligence (AI) assisted technology** – Any system which is able to make decisions based on data without the explicit involvement of a human user and/or receives input from, is modified by or utilises data which has been generated by a Large Language Model (LLM), Generative Adversarial Network (GAN), Neural Network (NN) or other similar structures will be considered to be AI-assisted technology.

1.2.1.1 Examples of this include popular online tools such as *OpenAI ChatGPT*, *Google Gemini* and the *Microsoft Co-Pilot* system.

1.3 The effective management and security of data is paramount to the adoption of any technology. The Rugby Borough Council Information Governance Group (IGG) will monitor and assess all proposed and actual usages of AI-assisted technology to ensure adherence to Council data protection policies.

1.3.1 **Information Governance Group** – The IGG is responsible for ensuring the Council is compliant and operates in accordance with relevant data and information policies, these include:
  - Data storage and governance
  - Data retention
  - Data protection (GDPR)
  - Data usage and processing
  - Data sharing and 3rd Party usage.

The IGG meets on a monthly cadence chaired by the Chief Officer for Digital and Communications with representatives from Legal, Communications, IT services, DPO, and Transformation.

1.4 The governance framework will take a risk-based approach to the adoption of technology, reviewing all challenges, risks, issues and potential areas of concern ensuring that an informed decision can be made by all parties.

2. THE ROLE OF THE INFORMATION GOVERNANCE GROUP

2.1 All individuals accessing Council data, using Council systems, or operating Council devices or bring your own device (BYOD) personal device on the Council network are subject to this policy and are referred to as 'users'.

2.1.1 This includes all Council employees, contractors employed directly by the Council or by a third party working on behalf of the council, vendors, temporary and interim staff, consultants, elected members or any other individual working in pursuit of council activities.

2.2 Users must not access or utilise AI-assisted technology for council activities without the explicit and prior approval of the IGG.

2.2.1 Users can request authorisation from the IGG to access or utilise AI-assisted technology, a copy of this authorisation request is provided in Appendix 1 of this report.

2.2.2 If successful, the IGG will authorise the usage of AI-assisted technology and set the agreed scope and limitations of use. These must be adhered to at all times when utilising AI-assisted technologies in the pursuit of Council activities.

2.2.2.1 The user(s) listed on the authorisation request will then be permitted to access and utilise AI-assisted technologies within the agreed scope and limitations of use.

2.3 The IGG will keep a record of all individuals and teams who have been given authorisation or submitted a request to use AI-assisted tooling across the Council.

2.4 The IGG will monitor adherence to Council policy moving forwards, providing assurance that all data is being used within statutory limits and ethical standards.

3. ARTIFICIAL INTELLIGENCE USAGE POLICY

3.1 A copy of the Governing the use of Artificial Intelligence tools, generative models and LLMs at Rugby Borough Council policy is provided in Appendix 1 of this report.

Name of Meeting: Cabinet

Date of Meeting: 7 October 2024

Subject Matter: Establishing principles governing the usage of Artificial Intelligence at Rugby Borough Council.

Originating Department: Growth & Investment, Digital & Communications

DO ANY BACKGROUND PAPERS APPLY ☐ **YES** ☒ **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Rugby Borough Council
Corporate Policy

	Name	Role	Date
Author	**Dr. Thomas David Griffiths**	Chief Officer Digital and Communications, Senior Information Risk Officer (**SIRO**)	21/03/24
Consultation	**Aftab Razzaq**	Chief Officer Legal and Governance, Monitoring Officer (**MO**)	15/04/24
	Dan Green	Deputy Chief Executive	15/04/24
	Stuart Mewes	IT and Digital Services Manager	10/04/24
	Matthew Deaves	Communication and Information Manager	10/04/24
	Judith Hicks	Human Resources Manager	15/04/24
	Martin North	HR Data & Analytics Lead	15/04/24
	Joanna McCrea	Customer Services Manager	10/04/24
Approval	**Information Governance Group**		25/04/24

Governing the use of Artificial Intelligence tools, generative models and LLMs at Rugby Borough Council

Rugby Borough Council

August 2024

1. **Purpose**
   The purpose of this policy document is to provide a framework and guidance for the use of Artificial Intelligence (AI) tools by council employees, contractors, vendors, temporary staff, consultants or other third parties engaging in the pursuit of council activities, hereinafter referred to as 'users'.

   This policy is designed to ensure that the use of AI, specifically the use of Generative Models and Large Language Models (LLMs), is ethical, complies with all applicable laws, regulations and existing council policies.

   This policy outlines the current list of approved AI tools agreed by the Rugby Borough Council (RBC) Information Governance Group (IGG). The management of approvals and assessment of the suitability of AI tools is subject to regular review by the IGG.

2. **Use**
   This policy applies to all users, whether through the use of a council owned device or a bring your own device (BYOD) personal device, being used in the pursuit of council activities.

   The use of AI for work-related purposes must be carefully managed to ensure a positive and equitable outcome for all individuals involved. It's usage must promote fairness and transparency and avoid bias as far as reasonably practical. This is essential to avoid direct or indirect discrimination and positively contribute to Rugby Borough Councils goals to promote equal treatment.

   Users may use AI tools, specifically Generative models and LLMs such as ChatGPT and Gemini to generate text for content for reports, emails and presentations. However, particular attention should be given to the accuracy, efficacy and correctness of any generated content.

3. **Governance**
   Before accessing AI tools, Generative models or LLMs users **must** notify the IGG.

   A copy of the notification form is attached to this policy in Appendix 1.

   The IGG will keep a record of all individuals who have given notice for future reference and monitoring of adherence to council policy.

3.1 **Confidentiality**
   Under no circumstances should any user upload confidential data to an AI tool, or use an AI tool to alter, analyse, review, summarise or otherwise generate content arising from confidential data without the explicit prior approval of the IGG.

   Confidential data includes, but is not limited to, the following:
   - Commercially sensitive information
   - Non-public Council Information

- Financial data
- Non-pseudonymised Personal Information
- Medical information
- Exempt information (as defined in paragraph 1,2 and 3 of Schedule 12A of the Local Government Act 1972)
- Special Category Data (as defined in Article 4(13) of the UK GDPR)

Pseudonymisation is the process by which all directly personal identifying information has been removed from a data source.

> If you are unsure about the classification of data or have any questions, contact the Chief Officer, Digital and Communications:
> **Dr. Thomas David Griffiths | Thomas.Griffiths@rugby.gov.uk**

3.2 Copyright & Intellectual Property

All users must adhere to copyright laws and legislation when utilising AI tools, RBC does not allow the use of AI tools to alter or generate content which may infringe upon the intellectual property rights of others.

3.3 Risk Assessment

The use of AI tools in Council Activities carries a level of inherent risk. A User or their appropriate line manager **must** carry out a risk assessment, with the resultant risks added to the respective risk registers as necessary.

A copy of the risk assessment form is attached to this policy in Appendix 2.

The risk assessment should encompass all areas of risk, specifically including:
- Data security
- Reputational Impacts
- UK GDPR
- Data Protection
- Bias and Discrimination

4. Disclosure

All users must be open and transparent in their usage of AI tools, generative models and LLMs in the pursuit of council activities. All work product that has arisen, either in-part or fully, through the use of AI tools must be declared as such.

The following declaration **must** be included in the document or generated output.

> *This document was created with the assistance of Artificial Intelligence tools. The content contained with the document may have been written, generated, analysed, reviewed or otherwise assisted by the use of AI.*
> *The author has checked and assured this content for accuracy and has edited/revised as necessary.*

5. Accuracy

All data and information which is created with the assistance of AI must be reviewed and checked for accuracy **prior** to use. The User utilising the AI tool is responsible and accountable for checking the accuracy of content.

If a user experiences difficulty in determining the accuracy or correctness of generated content and information they **should not utilise AI tools** in their work and contact the **IGG** for further guidance.

6. **<u>Acknowledgement</u>**

I confirm that I have read and agree to the terms laid out in the policy contained within this document.

I agree to work collaboratively and transparently with the Information governance Group to develop the responsible, ethical, and lawful use of AI tools, generative models, and LLMs at Rugby Borough Council.

Full Name   _____ _____

(block capitals)

Signed   _____

Date   _____

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Appendix 1

Information Governance Group Notification Form

The Information Governance Group (IGG) is responsible for the management and oversight of AI tooling at Rugby Borough Council (RBC).

The purpose of this form is to inform the IGG of your intention to utilise AI tooling in the execution of your work duties at RBC.

Upon receipt of this form you will be invited to an upcoming IGG meeting to discuss the potential risks, benefits and responsibilities associated with the usage of AI tooling.

Employee Name _____

Reporting Chief Officer _____

Proposed use case for AI tooling:

Have you attached a risk assessment?

☐ Yes

☐ No, I wish to discuss the risks with the IGG

Proposed Start Date __ __ / __ __ / __ __ __ __

Proposed End Date __ __ / __ __ / __ __ __ __

☐ Open-ended

Completed forms should be emailed to   IGG@rugby.gov.uk

Appendix 2

<u>Artificial Intelligence Risk Assessment Form</u>

Likelihood, Impact	**1** to **4**		
Risk Rating	**Likelihood** x **Impact**		
RAG	**Green 1 - 3**	**Amber 4 - 6**	**Red 7+**

Risk	Date Added	Review Date	Risk Assignee	Consequences	Risk Rating Based on Current Internal Controls			RAG Rating			Direction		
—					Likelihood	Impact	Risk Rating				↑	↓	—