

USE OF GENERATIVE AI POLICY

Version: 20TH AUGUST 2025

| USE OF GENERATIVE AI POLICY | |
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| Division | SMT |
| For use by | All employees and volunteers of Age UK Norfolk |
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1.0 Introduction

STAFF AND VOLUNTEERS ARE NOT PERMITTED TO USE AI WITHOUT THE EXPRESS PERMISSION FROM THEIR LINE MANAGER, WITH ANY DOCUMENTATION PRODUCED IN THIS MANNER BEING FORMALLY APPROVED FOR USE.

This staff-facing policy outlines the standards for the proper use of external Generative AI (see definition below) services for all Age UK Norfolk staff.

It aims to:

- Protect Age UK Norfolk's' intellectual property.
- Ensure that the use of these systems reflects our company culture, ethics, and meets our regulatory, privacy, and legal obligations.
- Set a standard for proper use of these systems when carrying out Age UK Norfolk activities.
- Comply with all relevant laws, regulations, and privacy requirements, including the General Data Protection Regulation (GDPR).
- Adhere to the terms of use for Generative AI systems, especially regarding attribution and copyright issues.

This policy specifically addresses Generative AI and does not cover other AI areas like traditional machine learning tools, which require separate guidelines and considerations.

The policy recognises that using Generative AI, like any other third-party system, poses risks of data loss, regulatory breaches and copywriting infringement. It applies to all forms of access and use, paid or free, whether via API (Application Programming Interface - ie a user interface), or any other means. It applies to all Age UK Norfolk owned devices and to personal devices if they are being used to carry out Age UK Norfolk related work.

1.1 Scope

This policy is relevant to all staff, volunteers, contractors, and anyone else using AI systems on behalf of Age UK Norfolk. It covers the use of Generative AI tools for all work-related activities, whether conducted on-site or remotely, including from home. References to 'employees' throughout this document should be taken to mean anyone carrying out activity on behalf of Age UK Norfolk.

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1.2 Defining External Generative AI

Generative Artificial Intelligence (Generative AI) is a technology that creates new content, like text, images, sounds, and videos, by learning from existing examples. Unlike other AI tools that sort or predict information, Generative AI can produce original material, such as writing essays or generating media. While this technology offers many exciting possibilities, it also presents challenges like ethical concerns and privacy issues.

Examples of Generative AI include, but are not limited to:

- Text generation services such as large language models:
 - OpenAI's platforms
 - Microsoft's Bing with GPT integration
 - Google's Bard
- Microsoft O365's integration with OpenAI CoPilot
 - Microsoft GitHub CoPilot
 - BloombergGPT
- Image generation tools like latent diffusion models:
 - Stable Diffusion
 - Midjourney AI
 - OpenAI's DALL-E
- Other multimedia creation tools, including deepfake technologies.

Generative AI can be instructed to produce the following:

- Web content
- Reports
- Develop action plans
- To provide a summary of a large document
- Reorganising text to make it more user friendly or to look more professional
- Engaging in conversations
- Develop training materials

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- Data analysis
- Turning photos of walls with sticky notes into lists
- Analysing information
- Performing calculations
- Developing user guides such as how to add a shared email to Outlook
- Programming language
- Answering non-Age UK Norfolk specific questions
- Re-writing interview notes

There are many opportunities in using Generative AI, but it does come with risks. All Age UK Norfolk employees or users of Age UK IT equipment or those with access to Age UK systems and data are responsible for using Generative AI safely and not to put Age UK, our stakeholders or beneficiaries at risk.

1.3 Purpose

This policy is a guide for using Generative AI in a secure, constructive, and responsible way. It helps to make sure Generative AI is used safely and does not result in a negative impact for Age UK Norfolk, the people we support, our staff, volunteers, supporters, or the effectiveness of the work we do. It also covers making sure the Generative AI information is accurate and useful.

2.0 Risks associated with Generative AI platforms

2.1 Data and information protection risks

Using Generative AI platforms involves significant data protection and information security risks. These include:

- Unintentional disclosure and malicious exploitation of sensitive data: Personal information like staff details, CV's, customer data, and beneficiary information, along with confidential business data and trade secrets, could be inadvertently exposed or purposefully misused.

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- Compromised data access and storage: There is a risk that data shared on Generative AI platforms could be accessed by unauthorised individuals or stored in locations with weaker data protection laws or compliance.
- Age UK does not own any secure Generative AI platforms at present. External Generative AI platforms are open to the public and you should therefore assume that any information input into the platform could be shared as content with any other global users.

2.2 Reliability and content risks

Employees should be aware that the outputs from Generative AI platforms are prone to significant risks. **AI models are trained on vast datasets, but they lack the ability to understand context, nuance, or real-world implications.** This can lead to several issues:

- **Errors and Misleading Information:** AI can generate incorrect or misleading content due to limitations in data quality, biases in training data, or misunderstandings of prompts. For example, AI image generators have produced images of people with extra fingers due to their inability to accurately process visual information.
- **Unethical, Biased, or Nonsensical Content:** AI models can perpetuate harmful stereotypes or biases present in their training data. Additionally, they may generate content that is irrelevant, incoherent, or even offensive.
- **Copyright and Trademark Infringement:** AI-generated content can inadvertently incorporate copyrighted or trademarked material without proper attribution.
- **Cultural and Social Inappropriateness:** AI may generate content that is insensitive to cultural differences or violates social norms.
- **Inaccurate Legal Information:** AI can provide incorrect legal advice, often based on data from different jurisdictions or outdated laws.

Hiring managers must exercise caution when reviewing CVs. While AI can be a tool for job seekers, it is essential to verify the authenticity of information presented. Common indicators of AI-generated CVs include overly generic language/phrases, lack of personalisation, cover letter-resume disparity, inconsistent work history, or a lack of specific details and accomplishments. To uphold transparency and fairness,

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candidates should be encouraged to disclose any use of AI in creating their CV on recruitment pack. This information will be treated confidentially and will not negatively impact their application.

By understanding these risks and following appropriate guidelines, we can mitigate potential harm and ensure the responsible use of AI within Age UK Norfolk. This approach will help maintain the integrity of the hiring process and support a fair evaluation of all candidates.

3.0 Summary Guidance for Use

Staff, volunteers, and others acting on behalf of Age UK Norfolk must adhere to the following guidelines when using Generative AI platforms to help mitigate the risks outlined in section 2:

1. **Protect People's Privacy:** Never input any personal data or sensitive information about older people, staff, volunteers, or donors into Generative AI tools. This includes names, addresses, health details, financial information, or any data that could identify an individual.
2. **Thorough Review Process:** All AI-generated content intended for official Age UK Norfolk documents, publications, or external communications must be carefully reviewed by a qualified staff member. Ensure the content aligns with Age UK Norfolk's mission, values, and accurately represents issues affecting older people.
3. **Protect Confidential Data:** Avoid using any confidential or internal Age UK Norfolk documents as input.
4. **Fact-Check Outputs:** Always verify any statistics, claims, or information about ageing, benefits, or services for older people generated by Generative AI tools against trusted sources before using them in Age UK Norfolk materials.
5. **Maintain Age UK Norfolk's Voice:** Edit AI-generated content to ensure it reflects Age UK Norfolk's tone, values, and expertise in supporting older people. AI should assist, not replace, our unique perspective and experience.
6. **Avoid Sensitive Topics:** Do not use AI to generate content on highly sensitive or complex issues affecting older people, such as end-of-life care or abuse, without expert human oversight.
7. **Respect Copyright:** Ensure any AI-generated content does not infringe on copyrighted materials, especially when creating resources or campaign materials for older people.

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8. **Balanced Use:** Consider whether using Generative AI truly improves efficiency for your task. For tasks requiring nuanced understanding of older people's needs, direct human expertise may be more appropriate.
9. **Follow proper channels for Generative AI tools:** Employees interested in acquiring Generative AI tools from a supplier must follow Age UK Norfolk's procurement policy

which requires due diligence and in complex cases a Data Protection Impact Assessment by the IP&C team.

4.0 Policy

4.1. Appropriate Use of Generative AI Systems

AI systems may be used for tasks such as data analysis, content creation, decision-making, and communication, however Age UK Norfolk Staff must:

- **Use Generative AI tools responsibly:** Employ AI tools solely within the relevant terms and conditions, all relevant laws, and regulations and within the conditions of Age UK Norfolk's Data Protection Policy and Information Security Policy.
- **Use Generative AI tools in line with Age UK Norfolk's values:** Ensure AI usage reflects Age UK Norfolk's values and furthers Age UK Norfolk's objectives. Generative AI must be used responsibly and only in support of progressing Age UK Norfolk's strategy.
- **Apply critical thinking:** Exercise due diligence and critical analysis when using AI-generated outputs, as they may produce biased, inaccurate, or inappropriate results.

4.2. Data Protection and Privacy

When using AI systems, all staff must adhere to Age UK Norfolk's Data Protection Policy, which includes:

- **Protect Data:** Ensure that sensitive and personal data, particularly that of older people we support, is anonymised, encrypted, or otherwise secured when used with AI tools.

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- **Obtain Consent:** Secure appropriate consent from individuals when necessary.
- **Report Incidents:** Immediately report any data breaches or incidents involving AI systems using Age UK Norfolk reporting process.

4.3. Use of AI Meeting Notetakers.

When using AI-powered notetaking tools, Age UK Norfolk employees must adhere to the following guidelines:

- MS Teams transcription is permitted for use.
- Other AI-powered notetaking tools may be used at the discretion of employees, but must:
 - **Obtain Permissions:** Secure consent from all meeting participants before activating any AI meeting notetakers.
 - **Verify Accuracy:** Review and, if necessary, edit AI-generated notes to ensure their accuracy.
 - **Maintain Privacy:** Adhere to Age UK Norfolk's Data Protection Policy when handling and storing sensitive information. Information should be retained only in accordance with our data retention policy
 - **Inform Participants:** Notify external meeting participants about the use of AI notetakers and offer them the option to opt out if they prefer.

4.4. Ethical and Legal Use of Generative AI Regarding Copyright

It is crucial that the use of Generative AI respects copyright laws and the rights of authors and visual artists such as photographers and filmmakers. All Age UK Norfolk staff must:

- **Respect Copyright Laws:** Ensure Generative AI tools are used in ways that comply with copyright laws and ethical standards.
- **Obtain Permissions:** Secure the necessary permissions or licenses before using copyrighted materials.
- **Give Proper Attribution:** Always credit authors and owners when using or sharing their work.

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- **Report Infringements to the Brand Team:** Any potential copyright infringements should be reported to the Brand Team, who will manage the issue. The team will either resolve the situation by removing the content or escalate it to the Legal Team if necessary.
 - **Point of Contact:** For any inquiries or issues related to copyright, please reach out to: Rebecca King / Anna Pietrowski at Age UK National via the Senior Management Team of Age UK Norfolk.
 - **Resolution Process:** Content will be promptly removed if found to be infringing, or the matter will be escalated.

4.5. Intentional Misuse

Intentionally misusing Generative AI systems is strictly prohibited. This includes any deliberate actions that breach ethical, legal, or moral standards, potentially endangering the safety, privacy, or security of older people, our staff, or the wider community. Examples of intentional misuse include:

- **Fraud:** Using Generative AI to deceive or manipulate older people or donors, such as through scams or identity theft.
- **Discrimination:** Allowing Generative AI systems to unfairly treat people based on characteristics that are protected by the Equality Act 2010 such as age, ethnicity, or disability.
- **Privacy Violations:** Using Generative AI to collect personal data about people we support or people who support us without proper consent.
- **Malicious Activities:** Employing Generative AI for harmful purposes, such as cyberattacks or exploiting vulnerabilities in our systems.
- **Misinformation:** Creating or spreading false information about ageing or Age UK Norfolk's services using Generative AI tools.

4.6. Unintentional Misuse

Even the best-intentioned use of Generative AI can sometimes lead to unexpected issues. This happens when staff rely on Generative AI tools in ways that unintentionally cause harm or negative results. Examples of unintentional misuse could include:

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- **Bias:** Unknowingly perpetuating stereotypes about older people through AI-generated content or decisions.
- **Data Protection:** Accidentally exposing sensitive information about older people, staff, recruitment candidates or consultants when using Generative AI tools.
- **Inaccurate Information:** Relying on AI-generated content without fact-checking, potentially leading to misinformation about ageing or our services.
- **Inappropriate Content:** Sharing AI-generated material that may be unsuitable or offensive.
- **Overreliance:** Depending too heavily on Generative AI at the expense of human judgment, especially in sensitive situations involving older people's care or support.

4.7. Reporting Misuse

All Age UK Norfolk staff are encouraged to report any suspected misuse of Generative AI systems, whether intentional or unintentional, to their supervisor or another appropriate person. Reports can be made anonymously and will be treated confidentially.

Incident reporting should use the Age UK Norfolk incident reporting process.

5.0 Enforcement

Any breach of this policy may lead to disciplinary action, up to and including termination of employment or contract, following Age UK Norfolk's disciplinary procedures.

6.0 Review and Updates

This policy will be reviewed annually or as needed based on changes in technology, regulation, or organisational needs. All updates will be communicated to staff and volunteers.