

BROMSGROVE DISTRICT COUNCIL

Overview and Scrutiny

21st of July 2026

Use of Artificial Intelligence within Bromsgrove District Council

Relevant Portfolio Holder	Councillor Karen May
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Hannah Corredor
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Wards Affected	N/A
Ward Councillor(s) consulted	N/A
Relevant Council Priority	
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Overview and Scrutiny Board is asked to RESOLVE that:-

The Council's current use of Artificial Intelligence (AI) be noted.

2. BACKGROUND

- 2.1 Artificial Intelligence technologies are increasingly embedded within mainstream business applications, including Microsoft 365 Copilot and other automation tools. The Council is beginning to use AI to improve efficiency, reduce manual workload, and support data-driven decision making.
- 2.2 AI introduces governance challenges relating to data protection, transparency, bias, and accountability. In response, the Council introduced governance and controls, primarily through an AI policy in 2025. The policy requires the use of approved AI tools only, prevents the entry of sensitive data, requires staff review of all AI-generated outputs, confirms that AI is not used for autonomous decision-making. Further detail is below and in full in Appendix 2.

3. OPERATIONAL ISSUES

- 3.1 AI is currently used in a controlled manner, primarily through Microsoft Copilot, to support drafting, summarisation, research and administrative tasks. AI is used only as a support tool, and staff remain responsible for outputs. Currently Co-Pilot is available to all staff and members through the free version and 22 licenses have also been purchased that gives a more in-depth experience of AI.
- 3.2 We are monitoring the use of AI by our core suppliers to manage potential emerging risks. Most of our main departmental business IT systems do not currently include AI. Some suppliers are developing capabilities, but current use remains limited. Emerging

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examples include housing system note summarisation, and Enterprise Resource Planning (ERP) based AI productivity tools. Please see Appendix 1 for a detailed breakdown.

3.3 Suppliers of our main departmental business systems report that:

- AI is being actively explored across product roadmaps
- Capabilities are expected to increase, particularly in:
 - Cloud-based platforms
 - Workflow automation
 - User productivity tools

However:

- Timelines are often uncertain or not formally committed
- Most AI capability is still at an early or developmental stage

3.4 ICT have developed a system based on AI to help move Freedom of Information Requests (FOI) into the correct department for answering. The use of AI in this area has greatly reduced the amount of time this administrative step takes and has helped in the reduction of FOI requests, taking longer than the 20 days required by law. The response itself is not supported by AI and all responses are still checked by a person before being sent out to the requester.

3.5 In compliance with the Authorities AI policy introduced in 2025, only approved AI tools may be used, with strict controls preventing entry of sensitive data. All outputs must be reviewed by staff, and AI is not used for autonomous decision-making. The AI policy is included in Appendix 2.

3.6 Governance for the procurement of all new IT systems, including those using AI, is provided by the Systems and Data group. Purchase of a completely new system, or new modules to an existing system, require the completion of a business case that highlights costs, risks, benefits and other council use cases (particularly in the Worcestershire County).

3.7 Current governance controls included within the AI policy:

- Mandatory human review of all AI-generated output
- Clear accountability: the individual user is responsible for content produced
- Requirement to check accuracy and mitigate bias before use
- Escalation to line managers or ICT where uncertainty exists

Additionally:

- Guidance and training materials are being rolled out via corporate platforms
- A formal AI Acceptable Use Policy has been implemented to standardise practice across the organisation

4. FINANCIAL IMPLICATIONS

4.1 Whilst there are no financial requests directly attributed to this report, ongoing license costs and potentially staff training, will need to be considered on a case-by-case basis if the use of AI increases.

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4.2 Current costs for the use of Copilot

22 Copilot licenses at £190 each = £4,180 (annually)

5. LEGAL IMPLICATIONS

5.1 AI systems must comply with:

- UK General Data Protection Regulations (GDPR)
- Data Protection Act 2018

This includes:

- Ensuring personal data is processed lawfully, fairly and transparently
- Preventing the entry of personal, confidential, or sensitive data into AI tools unless explicitly authorised
- Undertaking Data Protection Impact Assessments (DPIAs) where AI processes personal data

5.2 Under UK GDPR, there are specific restrictions on:

- Fully automated decision-making
- Profiling that significantly affects individuals

5.3 Equality and Bias (Equality Act 2010)

AI systems can introduce unintended bias, which could lead to discrimination.

Legal risks include:

- Indirect discrimination through biased outputs
- Failure to meet the Public Sector Equality Duty

Mitigation requires:

- Human oversight
- Equality Impact Assessments (EqIA) where AI is used in service delivery
- Ongoing monitoring of outcomes

6. OTHER - IMPLICATIONS

Local Government Reorganisation

6.1 Partnering authorities within the county also use Microsoft Co-Pilot. There are no known implications for LGR.

Relevant Council Priority

6.2 AI will, in the near future, impact the operational delivery of all service areas and therefore the ability of the council to deliver on its priorities.

Climate Change Implications

6.3 **Positive Impacts**

AI has the potential to support the Council's climate objectives by:

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- Reducing paper usage
 - Through improved digital workflows and document automation
- Improving operational efficiency
 - Streamlining processes can reduce resource consumption (e.g. printing, travel, manual processing)
- Supporting smarter decision-making
 - Data-driven insights may enable more efficient use of energy, assets, and services

Negative Impacts

There are also environmental considerations associated with AI technologies:

- Energy consumption
 - AI systems, particularly cloud-based and large-scale processing, can be energy-intensive
- Increased reliance on data centres
 - Greater use of AI services contributes to demand on external infrastructure
- Indirect carbon impact
 - Increased digital processing and storage may increase overall carbon footprint if not managed

Current Position

At present:

- The Council's use of AI is limited and low impact, primarily focused on:
 - Productivity tools (e.g. Copilot)
 - Non-intensive processing tasks

Equalities and Diversity Implications

6.4 Equality and Diversity Implications

The use of Artificial Intelligence (AI) within the Council has potential implications for equality, fairness, and inclusion, which must be carefully managed.

Potential Risks

Bias and Discrimination

AI systems can reflect or amplify bias present in:

- Training data
- Algorithms
- Prompting or user input

This creates a risk of:

- Indirect discrimination
- Unequal service outcomes for protected groups

These risks are particularly relevant if AI is used in:

- Customer-facing services
- Case management or decision-support processes

Lack of Transparency

AI-generated outputs may:

- Not clearly explain how decisions or recommendations were produced
- Be difficult to evidence or justify

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This could impact:

- Fairness
- Public trust
- The Council's ability to demonstrate compliance with equality duties

Digital Exclusion

Increased reliance on AI and digital tools may:

- Disadvantage residents who:
 - Have limited digital access
 - Have accessibility needs
 - Require assisted or tailored communication

Current Position

At present:

- AI is used primarily for internal productivity purposes (e.g. drafting, summarisation)
- It is not used for automated decision-making or service delivery decisions
- All AI outputs are subject to human review and oversight

This significantly reduces current equality risks.

7. RISK MANAGEMENT

7.1 Overall Risk Position

The current risk level is considered manageable and controlled, as AI use is limited, non-decision-making, and subject to clear governance controls. However, risk is expected to increase over time as AI becomes more embedded in core systems and service delivery, requiring continued development of governance frameworks. This risk is currently captured in the Operational Risk register for IT.

8. APPENDICES and BACKGROUND PAPERS

Appendix 1 - Responses from application suppliers

Appendix 2 - AI Acceptable Use Policy

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Cllr Sue Baxter on behalf of Cllr Karen May	09/07/2027
Lead Director / Assistant Director	Hannah Corredor	17/06/2026

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Financial Services	Deborah Goodall	03/07/2026
Legal Services	Nicola Cummings	26/06/2026
Policy Team (if equalities implications apply)	Helen Mole	09/07/2026
Climate Change Team (if climate change implications apply)	Matthew Eccles	09/07/2026

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Appendix 1 – Responses from application suppliers

Responses from suppliers of departmental business systems on their current and planned inclusion of AI.

Supplier	Product	AI Use	Response
AccessPay	BACS Submissions	No	We are evaluating the use of AI as part of our product, however, currently no AI functionality is included. I have cc'd in your account manager as they would be able to provide roadmap information
AllPay	TotalConnect	No	After raising this query with our technical teams, they have advised that they don't have any current plans for AI in total connect. If you would like to stay up to date you can request roadmaps from your client development manager, as well as the roadmaps being updated on resources regularly.
Civica	Open Revenues	No	At present the OPEN Revenues software does not use AI. Civica is actively engaged with AI across all products, but I can't give you specific development details or timescales for OPEN Revenues, please contact your account manager if you require a copy of the product roadmap.
Civica	Xpress	No	We do not use AI in any form in the current Xpress on prem solution and have no intention of doing so. In terms of future plans, AI is being utilised in the development of our new cloud-based CEM product and within the product itself. AI will be focussed on saving administrator time on basic tasks (as is currently done in Xpress work queues currently but without the use of AI). It is early days, but we will start sharing some information at the User Group later this month and will communicate any plans for our use of AI as this evolves. The roadmaps are being rewritten across Civica to reflect any use of AI and we will share ours for EMS once it is available. With CEM we are aiming to be development complete by

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			December 26 and are working with a number of LA's who are helping to shape the product.
Idox	Uniform		No Response
MRI/Housing Partners	Jigsaw	Yes	We reached out to our internal team to confirm the current position regarding AI functionality within the software. We have been advised that the only active AI feature currently available is the Notes Summary functionality, which was introduced recently. With regard to future AI developments, there may be additional AI functionality planned for upcoming releases. To find out more about what is currently included on the product roadmap, we would recommend contacting your Account Manager, who will be able to provide further details and discuss any planned developments and anticipated timescales.
Frontier	Chris21/HR21	No	I don't believe there is any AI currently, but anything surrounding this subject is best discussed with your relationships manager, so I have asked Sharon to drop you a line
TechnologyOne	ERP	No, but yes in next release	TechnologyOne has launched <i>PLUS</i> in 2026A. You would have to upgrade to at least 26A to take advantage of our AI products. <i>PLUS</i> includes: • Insights & monitoring • Stay informed when budgets are breached, contracts are nearing expiry, or tasks become overdue, so nothing critical slips through the cracks. • Everyday productivity • See <i>what's in focus today</i>, get reminders for critical actions, and receive suggestions on what to tackle next to keep work moving. • Agentic AI • Ask Plus about your outstanding tasks, action them, create purchase requisitions, create work orders and more using AI as your TechnologyOne business process assistant

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Windcave	Card Payment Processor	No	At this time, we do not utilise AI features within our APIs, products, or services. While our roadmap is not something we can publicly share, I can confirm that there are currently no plans to implement AI functionality. That said, we would be interested to learn more about the type of AI features you are looking for. If you're able to share additional details, I would be happy to pass this feedback on to the relevant teams to help inform future planning
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Appendix 2 - AI Acceptable Use Policy

AI Acceptable Use Policy

Version 1.2

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Document Control

Organisation	Bromsgrove and Redditch Councils
Owner	ICT Transformation Manager
Protective Marking	Not protected
Review date	One year from last approval

Version History

Revision Date	Reviser	Version	Description of Revision
20250321	Mark Hanwell	0.1	Policy drafted
20250521	Julie Hemming-Smout	1.0	Policy finalised
20250724	Julie Hemming-Smout	1.1	Slight amendment after going to members (BDC)
20251210	Julie Hemming-Smout	1.2	Slight amendment after going to members (RBC)

Document Approvals

Sponsor Approval	Name	Date	Version Approved

Policy Governance

The following table identifies who within the Council is Accountable, Responsible, Informed or Consulted with regards to this policy. The following definitions apply:

- **Responsible** – the person(s) responsible for developing and implementing the policy.
- **Accountable** – the person who has ultimate accountability and authority for the policy.
- **Consulted** – the person(s) or groups to be consulted prior to final policy implementation or amendment.
- **Informed** – the person(s) or groups to be informed after policy implementation or amendment.

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Policy Compliance

- 1.1 Non-compliance with this policy could have a significant effect on the efficient operation of the Council and may result in financial penalties, damage to our reputation, failure to meet our legal obligations, and an inability to provide necessary services to our customers. Contravening or failing to act within the spirit of the policy, might be seen as a breach of discipline and may lead to disciplinary procedure.
- 1.2 If you do not understand the implications of this policy, seek advice from your line manager who, if concerned, may contact ICT for further advice.

Acknowledgement

- 1.3 This policy has been developed based on guidance prepared by Socitm (UK):
 - www.socitm.net
- 1.4 Disclosure: Sections of this policy were generated with the assistance of an Artificial Intelligence (AI) based system to augment the effort. AI generated content has been reviewed by the author for accuracy and edited/revised where necessary. The author takes responsibility for this content.

Document Distribution

This document will be distributed via NetConsent to all Council employees, all temporary staff and all contractors. For those without access to NetConsent the Policy can be signed and returned to the Information Management Team.

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1. Introduction

- 1.1 Artificial Intelligence (AI) is several different technologies working together to enable machines to sense, comprehend, act, and learn with human-like levels of intelligence. AI is a transformative technology, which is already revolutionising many areas of our lives. Whether we know it or not, we all interact with AI every day - whether it's in our social media feeds and smart speakers, or on our online banking. AI, and the data that fuels our algorithms, help protect us from fraud and diagnose serious illness and this technology is evolving every day.
- 1.2 Generative Artificial Intelligence (GenAI), such as ChatGPT and CoPilot, augments human capabilities and possibilities. Based on public data-trained models, GenAI algorithms can generate new and creative information/data like the original content produced by humans. GenAI is a type of AI that, as this name suggests, generates new content. This contrasts with other types of AI, like discriminative AI, which focuses on classifying or identifying content that is based on pre-existing data.
- 1.3 AI-based technologies, can now be used to create pictures, write papers, write application code, draft articles and social media posts, and generate videos and audio recordings simply by writing a few sentences. However, while these capabilities help accelerate the creation of knowledge-based content, there are risks. For example, AI-generated results could deceive or mislead readers because of bias, data quality issues, malicious intent, lack of diverse thoughts, and a simple lack of ethics in disclosing the source of the content. Therefore, while the results may be excellent, the information generated must be weighted cautiously, as AI output is based on available data at the time and how it was trained. This is no different than information received from a human and should be treated as another source of information that should be weighed in with other viewpoints and sources.
- 1.4 AI has the potential to transform Bromsgrove District and Redditch Borough Councils (the Council) by improving efficiency, increasing citizen engagement, and providing data-driven insights.
- 1.5 This policy is designed to establish guidelines and best practices for the responsible and ethical use of AI within the Council. It ensures that our employees are using AI systems and platforms in a manner that aligns with the authority's values, adheres to legal and regulatory standards, the Council's existing information governance and security policies, and promotes the safety and well-being of our stakeholders.

2. Policy Statement

- 2.1 Use of AI must be in a manner that is responsible and ethical, avoiding any actions that could harm others, violate privacy, or facilitate malicious activities. Use of AI should promote fairness and avoids bias to prevent discrimination and promote equal treatment and be in such a way as to contribute positively to the Council's goals and values.
- 2.2 Users may use AI for work-related purposes subject to adherence to the following guidelines. This includes tasks such as generating text or content for reports, emails, presentations, images and communications.
- 2.3 Particular attention should be given to transparency, governance, vendor practices, copyright, accuracy, confidentiality, disclosure and integration with other tools.

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3. Scope

- 3.1 This policy applies to all employees, elected members, contractors, agents and representatives and temporary staff working for or on behalf of the Council, hereinafter referred to as “users”.
- 3.2 This policy applies to all users with access to AI, whether through Council-owned devices or BYOD (bring your own device) in pursuit of Council activities.
- 3.3 There are multiple AI systems available to purchase. However, ICT maintain a list of approved systems. To receive an up-to-date list, please contact ICT.

4. Transparency and Accountability

- 4.1 Users must be transparent about the use of AI in their work, ensuring that stakeholders are aware of the technology's involvement in decision-making processes.
- 4.2 **Information Asset Register (IAR):** The IAR is a list of personal and non-personal information assets held by the Council. Where systems, services and platforms utilise AI technology, this should be included in the IAR, for AI governance and compliance efforts.
- 4.3 **Data Protection Impact Assessments (DPIA)s:** The use of AI to process personal data will, in the vast majority of cases, likely result in a high risk to individuals' rights and freedoms, and will therefore trigger the legal requirement for the undertaking or updating of a DPIA. This will be assessed on a case-by-case basis. If the result of an assessment indicates residual high risk to individuals that cannot be sufficiently reduced, the Council must consult with the Information Commissioner's Office (ICO) prior to starting the processing.
- 4.4 **Privacy Notices:** A privacy notice should provide clear and transparent information to individuals about how personal data is collected, used or otherwise processed, and to what extent personal data are, or will be, processed. Where systems, services and platforms utilise AI technology, this should be disclosed in the relevant privacy notice.
- 4.5 **Publication Scheme:** The aim of a publication scheme is to foster openness in government and increase transparency and improves public access to the information the Council holds, this includes AI systems.
- 4.6 **Content Disclosure:** For content produced solely via AI, (for example CoPilot and ChatGPT), disclosures are critical for people to know and understand how to interpret, analyse, and respond to the information they consume. Employees are responsible for the outcomes generated by AI systems and should be prepared to explain and justify those outcomes.

For example, here is a high level disclosure that could be used and associated with written content so the person consuming the content knows how to best handle the information they are consuming:

Disclosure: The following content was generated entirely by an Artificial Intelligence (AI) based system based on specific requests asked of the AI system. AI generated content has been reviewed by the author for accuracy and edited/revised where necessary. The author takes responsibility for this content.

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5. Automated Decision Making

- 5.1 AI can make decisions more quickly and accurately than humans by automating certain processes. The right to explanation and human review of algorithmic decision-making is an important part of the UK GDPR.
- 5.2 Legally you can only carry out this type of processing if you can rely on one of the three exceptions:
 - a. Explicit consent of the individual (Article 6(1)(a) of Regulation (EU) 2016/679 legislation - this must be a positive indication (and therefore there must be an alternative option)
 - b. Performance of a contract with the individual (Article 6(1)(b) of Regulation (EU) 2016/679 - e.g. credit checks or recruitment shortlisting)
 - c. Authorised by law i.e. there is a law enabling us to make automatic decisions about whatever it is we're trying to decide.Or there is human involvement in the decision making i.e. the decision is reviewed by a human to sense check (please consult with Information Management if processing special category data).
- 5.3 Automated decision-making should not be used without prior information being provided to the user (e.g. through use of a Privacy Notice). A detailed disclosure is therefore required that alerts consumers to the fact that they are being subjected to an automated decision, explains the basic logic the algorithm employs and lists the personal data that flow into the automated decision-making process and explains any right to appeal. Examples of where this disclosure should be provided include:
 - a. Online forms
 - b. Online portals
 - c. Applications

6. Procurement

- 6.1 A question(s) of AI must be included in the Invitation to Tender (ITT)
- 6.2 A clause will be included in the contract to state we prohibit suppliers from using artificial intelligence technologies without express consent.

7. Third-party Services

- 7.1 When utilising third-party AI services, systems or platforms, users must ensure that the providers adhere to the same ethical standards and legal requirements as outlined in this policy.

Staff should not participate in meetings where AI tools are in use, for example ReadAI and Otter. Those who are attending external meetings hosted by someone else, should ask whether AI tools are in use. If they are, you should ask the host to have the tool switched off for the duration of the meeting. If they decline, remove yourself from the meeting, or if this is not an option, ensure you do not discuss

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anything confidential and that you do not mind sharing with unknown companies/agencies in any country.

Some of these tools are not UK GDPR compliant and have not been approved by the Cyber Security Board or the System & Data Group.

The only approved tool currently, is the transcription and recording option provided by MS Teams.

- 7.2 Any use of AI technology in pursuit of Council activities should be done with full acknowledgement of the policies, practices, terms and conditions of developers and vendors.
- 7.3 Vendors will be required to inform the council of all use of AI technology in their systems and services.

8. Confidentiality and Data Protection

- 8.1 Employees must adhere to the Council's Information security policies and Systems & Data Guidelines when using AI systems. They must ensure that any personal or sensitive data used by AI systems is anonymised and stored securely.
- 8.2 Confidential and personal information must not be entered into an AI tool such as ChatGPT, where information may enter the public domain. Users must follow all applicable data privacy laws and organisational policies when using AI. If a user has any doubt about the confidentiality of information, they should not use AI.
- 8.3 Users should consult the [ICO's Guidance on AI and Data Protection](#) and use [the ICO's AI and DP Risk Toolkit](#) which provides further practical support to organisations to reduce the risks to individuals' rights and freedoms caused by AI systems.

9. Copyright

- 9.1 Users must adhere to copyright laws when utilising AI. It is prohibited to use AI to generate content that infringes upon the intellectual property rights of others, including but not limited to copyrighted material. If a user is unsure whether a particular use of AI constitutes copyright infringement, they should contact the legal advisor or the Information Management Team before using AI.

10. Ethical Use

- 10.1 AI must be used ethically and in compliance with all applicable legislation, regulations and organisational policies. Users must not use AI to generate content that is discriminatory, offensive, or inappropriate. If there are any doubts about the appropriateness of using AI in a particular situation, users should consult with their supervisor or ICT.

11. Equality, Bias and Fairness

- 11.1 Users must actively work to identify and mitigate biases in AI systems. They should

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ensure that these systems are fair, inclusive, and do not discriminate against any individuals or groups.

11.2 An Equality Impact Assessment ([Equality and Diversity - Equality Impact Assessments - All Documents](#)) must be completed to ensure, and be able to show, that the use of AI systems will not result in discrimination that:

- causes an individual subject to the decision to be treated worse than someone else because of one of these protected characteristics; or
- results in a worse impact on someone with a protected characteristic than someone without one.

12. Human-AI Collaboration

12.1 Users should recognise the limitations of AI and always use their judgment when interpreting and acting on AI-generated recommendations. AI systems should be used as a tool to augment human decision-making, not replace it.

12.2 A human review of decisions made by AI systems can be an important step to validate the decision proposed by the AI system.

13. Integration with other tools

13.1 API (Application Programming interfaces) and plugin tools enable access to AI and extended functionality for other services to improve automation and productivity outputs. Users should follow OpenAI's [Safety Best Practices](#) guidelines:

- Adversarial testing
- Human in the loop (HITL)
- Prompt engineering
- "Know your customer" (KYC)
- Constrain user input and limit output tokens
- Allow users to report issues
- Understand and communicate limitations
- End-user IDs.

13.2 API and plugin tools must be rigorously tested for:

- Moderation – to ensure the model properly handles hate, discriminatory, threatening, etc. inputs appropriately.
- Factual responses – provide a ground of truth for the API and review responses accordingly.

14. Ensuring data quality for AI and checking outputs

14.1 AI is dependent on good quality data and accurate algorithms. It is important to implement auditing of the datasets used by AI, both for accuracy and consistency, by reviewing and spot-checking of the results generated.

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15. Accuracy

- 15.1 All information generated by AI must be reviewed and edited for accuracy prior to use. Users of AI are responsible for reviewing output and are accountable for ensuring the accuracy of AI generated output before use/release. If a user has any doubt about the accuracy of information generated by AI, they should not use AI.

16. Training and Education

- 16.1 Users who use AI systems should receive appropriate training on how to use them responsibly and effectively. They should also stay informed about advances in AI technology and potential ethical concerns.

17. Guidelines for content produced by AI

- 17.1 Content solely produced via AI, such as ChatGPT and CoPilot, must be identified and disclosed as containing AI generated information.

 Do use • Do use AI for presentations • Do use AI for analysing public data • Do use a footnote advertising AI has been used to generate information for this document • Do use AI responsibly and ethically	 Don't use • Don't use AI for confidential information • Don't use AI to store public records • Don't use AI for private customer records	 Be • Be careful when analysing data that the AI is only using the data you have provided / specified • Be careful the use of AI does not breach copyright or intellectual property rights • Be aware of AI risks around confidentiality, accuracy, bias and security
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18. Risks – link risks and DPIA together above

18.1 Legal compliance

Data entered into AI may enter the public domain. This can release non-public information and breach regulatory requirements, customer or vendor contracts, or compromise intellectual property. Any release of private/personal information without the authorisation of the information's owner could result in a breach of the UK GDPR and the amended version of the Data Protection Act 2018. Use of AI to compile content may also infringe on regulations for the protection of intellectual property rights including the Copyright Act 1956. Users should ensure that their use of any AI complies with all applicable laws and regulations and with Council policies.

18.2 Bias and discrimination

AI may make use of and generate biased, discriminatory or offensive content. Users should use AI responsibly and ethically, in compliance with Council policies and applicable laws and regulations.

18.3 Security

AI may store sensitive data and information, which could be at risk of being breached or hacked. The Council must assess technical protections and security certification of AI before use. If a user has any doubt about the security of information input into AI, they should not use AI.

18.4 Data sovereignty and protection

While an AI platform may be hosted internationally, information created or collected in the United Kingdom of Great Britain and Northern Ireland (UK), under data sovereignty rules, is still under jurisdiction of UK laws. The reverse also applies. If information is sourced from AI hosted overseas for use in the UK, the laws of the source country regarding its use and access may apply. AI service providers should be assessed for data sovereignty practice by any organisation wishing to use their AI.

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Appendix A: Example Staff Privacy Notice AI Statement

Purpose for processing

The Council's Human Resources (HR) and Organisational Development (OD) Service collects and processes personal data relating to our employees to manage our working relationship with you both directly and through our commissioned private sector processors.

This includes employment law and standards, administration of employee benefits, and all aspects of recruitment and employee management, staff engagement, feedback and compliance. We are committed to being transparent about how we collect and use your personal data and to meeting our obligations under data protection legislation.

These processing activities undertaken include:

- manage the HR and payroll functions so you receive correct remuneration and benefits and in order to administer your HR employment records
- monitoring and reporting of workforce statistics
- compliance with regulatory and inspection regimes (e.g. Local Government Ombudsman), including providing statistics
- prevention and detection of crime
- protection of the public funds we administer, including prevention and detection of fraud
- monitoring and reporting of access to and use of Council owned/rented buildings and car parks and ensure compliance to associated policies

We may also use automated decision-making or profiling techniques, including AI algorithms, to assess certain aspects of your employment, such as performance evaluations or training needs. These automated processes are designed to support fair and objective decision-making.

Your information rights

You are entitled to a copy, or a description, of the personal data we hold that relates to you, subject to lawful restrictions. Please go to our [Make a Data Protection Request](#) page to find out how to make a request or contact the Information Management Team information.management@bromsgroveandredditch.gov.uk

You may also be entitled to have incorrect or incomplete data amended, object to the processing (in some circumstances), the right to obtain human intervention with regards to automated processing (including profiling), and the restriction or erasure of your personal data where the data is no longer necessary for the purposes of processing depending on the service and legal basis. Please contact Information Management to exercise these Information Rights.

Please see our overarching [Privacy Notice](#) for further contact details and if you have a complaint about your information rights.

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Appendix B: Example transparency information about use of AI

This information is to be included on the website and referenced in the Publication Scheme.

As part of our commitment to transparency and openness, we provide information about our systems that utilise artificial intelligence (AI). This information aims to promote understanding and awareness of the AI systems we employ, their purpose, and their potential impact.

Purpose of AI Systems

Our AI systems are designed to enhance and automate various processes within our organisation. These systems utilise advanced algorithms and machine learning techniques to analyse data, make predictions, or assist in decision-making.

Categories of AI Systems

1. **Intelligent Process Automation:** These AI systems automate repetitive and rule-based tasks, improving efficiency and reducing manual effort across various departments.
2. **Data Analytics and Insights:** These AI systems analyse large volumes of data to derive meaningful insights, identify patterns, and support data-driven decision-making.
3. **Natural Language Processing (NLP):** These AI systems process and understand human language, enabling intelligent text analysis, sentiment analysis, and language translation.
4. **Image and Video Analysis:** These AI systems employ computer vision techniques to analyse images and videos, facilitating object recognition, facial recognition, and content classification.
5. **Recommendation Systems:** These AI systems utilise machine learning algorithms to provide personalised recommendations to users based on their preferences and behaviour.

Impact of use of AI systems

1. **General Description:** A high-level overview of the purpose, functionalities, and intended use of each AI system category mentioned above.
2. **Data Sources and Processing:** Information about the data sources used by AI systems, data processing methodologies, and data security measures implemented to protect sensitive information.
3. **Ethical Considerations:** Explanation of the ethical considerations taken into account during the development and deployment of AI systems, including fairness, bias mitigation, and privacy protection.
4. **Human Oversight and Intervention:** Details on how human oversight is integrated into the AI systems, including validation, monitoring, and intervention protocols to ensure system performance and address potential risks.
5. **Impact Assessment:** Reports or summaries assessing the impact of AI systems on various aspects such as productivity, efficiency, quality, and potential societal

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implications.

Disclaimer

The information provided is subject to change and is accurate to the best of our knowledge at the time of publication. We reserve the right to update or modify the information as necessary.

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Appendix C: Example Privacy Notice text for systems using automated decision-making

This information is required to be inserted at the start of any process that includes automated decision-making affecting individuals that is not always reviewed or checked by a human:

- a. ensure that this text is added at the front of any system using automated decision making (this could be done by a box that expands when the user hovers over it - privacy info on demand) **and**
- b. add in a consent box at the end of this text for the individual to tick to say they agree **and**
- c. understand what the alternative option is for individuals who don't want to rely on an automated decision - this could be to make sure that the processing performed without consent is subject to a human review before finalising the decision.

The appeal right for someone to review the fully automated decision will still be needed regardless of the option to go down the fully-automated route.

Automated Decision-Making

Certain aspects of the decision-making process are automated, based on algorithms and artificial intelligence technologies. The following information is intended to provide transparency about the process and ensure you have an understanding of how the automated decision is made.

1. Purpose: The automated decision-making process is employed to *[state the purpose of the decision-making process, e.g., assess applications, determine eligibility for a service, etc.]*.
2. Logic: The algorithm utilises *[describe the basic logic or factors considered by the algorithm, such as historical data, statistical analysis, or specific criteria]* to evaluate the information provided and generate a decision.
3. Personal Data: The following personal data are used in the automated decision-making process: *[list the types of personal data that flow into the decision-making process, such as name, age, address, employment history, credit score, etc.]*.
4. Data Sources: The personal data used in the decision-making process may be obtained from *[describe the sources of data, such as user-provided information, public records, credit bureaus, etc.]*.
5. Accuracy and Reliability: We take utmost care to ensure that the data used in the automated decision-making process is accurate and reliable. We regularly update our data sources and employ data quality measures to minimise errors.

- ☐ I understand part of this process will include automated decision making and consent to this.
- ☐ I understand that I have the right to appeal or object to the decision, and the right to obtain human intervention in the decision.

Right to Appeal

Details of the Right to Appeal should be provided on a webpage providing information on our use of AI/automated decision-making as it will be the same for all systems. A hyperlink should be provided to the text from the declaration statement above.

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1. Review Mechanism: We understand the importance of fair and transparent decision-making. If you disagree with the outcome of the automated decision, you have the right to request a review or reconsideration of the decision.
2. Appeal Process: To exercise your right to appeal, please *[provide instructions on how consumers can initiate the appeal process, including any contact details, forms, or procedures]*.
3. Human Intervention: Our appeal process involves human intervention to reassess the decision and take into account any additional information or circumstances that may have an impact on the outcome.

Please note that the right to appeal is subject to *[state any limitations or conditions, such as specific timeframes for initiating an appeal, eligibility criteria, or any applicable legal requirements]*.

We are committed to ensuring fairness, transparency, and accountability in our automated decision-making processes. If you have any questions, concerns, or require further information about the automated decision-making process or your right to appeal, please contact *[provide contact details for further assistance]*."

Please customise this statement to fit your specific context, taking into account any legal requirements and ensuring that the information provided accurately the automated decision-making processes and appeals mechanism.

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Appendix D: Example ITT / SQ Question regarding use of AI

Example questions for use in the Invitation to Tender (ITT) / Selection Questionnaire (SQ) regarding the use of AI in products and services.

1. **AI Utilisation:** Does your application or solution incorporate any artificial intelligence (AI) technologies or features? Please provide details regarding the specific AI functionalities, algorithms, or techniques used within your application.
2. **AI Capabilities and Benefits:** How does the integration of AI within your application enhance its capabilities and deliver value to users? Please describe the specific benefits or advantages that AI brings to your solution, such as improved accuracy, automation, predictive capabilities, personalised experiences, or any other relevant aspects.
3. **Data Requirements:** Specify the data inputs required for your AI-powered functionalities to operate effectively. Describe the nature of the data sources, including data formats, volume, and any dependencies or prerequisites for successful AI processing.
4. **Training and Model Updates:** Explain how the AI models or algorithms within your application are trained and updated over time. Provide information on the frequency and process of model updates or retraining to ensure optimal performance and accuracy. Clarify whether user data is utilised for ongoing model improvement and outline any privacy considerations related to this aspect.
5. **Explainability and Transparency:** Detail the steps taken to ensure transparency and explainability in the AI-driven decisions or outcomes generated by your application. Describe how users can understand the rationale behind AI recommendations, predictions, or actions, and any mechanisms in place to provide relevant explanations or context.
6. **Ethical Considerations:** Outline the ethical considerations and safeguards implemented within your application's AI functionalities. Discuss how your solution addresses potential biases, fairness, privacy, or any other ethical challenges associated with AI utilisation. Provide details on any third-party audits, certifications, or guidelines adhered to in ensuring ethical AI practices.
7. **Integration and Compatibility:** Specify the compatibility of your application's AI features with existing systems, infrastructure, or platforms within our organisation. Describe any potential integration requirements, dependencies, or limitations that need to be considered for seamless adoption and usage.
8. **Support and Maintenance:** Describe the support and maintenance services provided for the AI components of your application. Outline the availability of technical assistance, updates, bug fixes, and any ongoing support to ensure the smooth operation and performance of the AI features.

Note: The above question serves as a starting point to ascertain whether the tendered applications incorporate AI technologies. It should be customised to suit the specific requirements and objectives of the tender, aligning with the desired information about the AI utilisation within the applications being evaluated.

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Appendix E: Example clause for use in contracts regarding use of AI in products and services

Example clause for use in the contracts:

"Prohibition of Supplier's Use of Artificial Intelligence Technologies without Express Consent

1. The supplier acknowledges and agrees that, without obtaining the express written consent of the Council, they shall not use any artificial intelligence (AI) technologies within the products, services, or solutions delivered under this contract.
2. "Artificial intelligence technologies" refer to any algorithms, machine learning models, or automated decision-making systems that utilise AI methodologies to analyse data, make predictions, automate tasks, or perform other AI-related functionalities.
3. The supplier shall not deploy or integrate AI technologies within their deliverables or services without the explicit written permission of the Council. This includes, but is not limited to, incorporating AI into software applications, utilising AI-powered analytics, or employing AI- driven automation.
4. If the supplier intends to use AI technologies within the scope of this contract, they must submit a formal request to the Council detailing the purpose, functionality, data requirements, and potential impact of the proposed AI utilisation. The Council reserves the right to review, evaluate, and grant or deny permission for such AI usage at its sole discretion.
5. Any unauthorised use of AI technologies by the supplier, including accidental or incidental use, without the express consent of the Council shall be deemed a material breach of this contract.
6. In the event that the supplier receives consent for the use of AI technologies, they shall be responsible for ensuring compliance with all applicable laws, regulations, and ethical considerations governing the use of AI, including but not limited to data protection, privacy, fairness, and transparency.
7. The Council reserves the right to monitor and audit the supplier's use of AI technologies to verify compliance with the terms and conditions outlined in this clause. The supplier shall cooperate fully with any such monitoring or auditing activities.
8. This clause shall survive the termination or expiration of the contract and shall remain in effect until otherwise agreed upon in writing by the Council.

By entering into this contract, the supplier acknowledges that they have read, understood, and agreed to comply with the terms and conditions outlined in this clause regarding the use of artificial intelligence technologies without express consent."

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Please note that this example clause should be reviewed and customised to align with the specific requirements and legal framework of the Council. It is advisable to seek legal advice to ensure compliance with relevant laws and regulations related to the use of AI technologies.

Appendix F: Areas that training on the use of AI could cover

1. Understanding AI Fundamentals

Users should receive training on the fundamental concepts of artificial intelligence, including machine learning, algorithms, and automated decision-making. This training should provide an overview of how AI systems work, their limitations, and potential biases that may arise.

2. Responsible Use of AI

Training should emphasise the importance of using AI systems responsibly and ethically. Users should be educated on the potential impact of their actions when utilising AI technologies and be aware of the ethical considerations involved, such as fairness, transparency, privacy, and bias mitigation.

3. Effective Utilisation of AI Systems

Users should be trained on how to effectively utilise AI systems to achieve their intended goals. This training may include instruction on how to input data correctly, interpret AI-generated outputs, and leverage the capabilities of the AI system to improve decision-making or automate tasks.

4. Evaluating AI Results

Users should learn how to critically evaluate the outputs and results generated by AI systems. Training should cover methods to verify the accuracy and reliability of AI-generated information, validate predictions or recommendations, and identify potential errors or inconsistencies.

5. Staying Informed on AI Advances

Users should be encouraged to stay up-to-date with advancements in AI technology. This can be achieved through ongoing training, webinars, conferences, or access to educational resources that highlight the latest developments, best practices, and emerging ethical concerns related to AI.

6. Ethical Considerations and Social Impact

Training should address the broader societal impact of AI and the ethical considerations associated with its use. Users should be educated about the potential consequences of biased or discriminatory AI systems and the importance of promoting fairness, inclusivity, and accountability in AI applications.

7. Privacy and Data Protection

Users should receive training on the privacy and data protection aspects related to AI systems. This includes understanding the types of personal data being processed, data storage and security measures, and compliance with relevant privacy regulations. Users should also be aware of their responsibilities in handling sensitive data when interacting with AI systems.

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8. Reporting and Feedback

Users should be educated on how to report issues or concerns related to AI systems. Training should provide clear channels for users to provide feedback, report biases, or highlight potential ethical issues they encounter while using AI systems.

It is essential to provide periodic refresher training sessions and resources to ensure that users stay well-informed about responsible and effective AI system usage. The training program should be tailored to the specific AI systems in use and the needs of the user community.