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Policy Name	AI Policy
Policy Author	Corporate Services Officer
Approved by Sub Committee	N/A
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West Whitlawburn Housing Co-operative will provide this policy on request at no cost, in larger print, in Braille, in audio or other non-written format, and in a variety of languages. Please contact the office.

Registered with the Scottish Housing Regulator No. 203
Registered Charity No. SCO38737, VAT Registration No. 180223636
Registered society under the Co-operative and Community Benefit Societies Act 2014



1. Introduction

- 1.1 Artificial Intelligence (AI) is an umbrella term for a range of technologies and approaches used to emulate human intelligence to solve complex tasks. This policy relates to AI tools used to interpret and generate information and content. The use of such “generative AI” (GenAI) is now appearing in the tools, systems and processes that West Whitlawburn Housing Co-operative (WWHC) use daily.
- 1.2 WWHC recognise that the informed and responsible use of GenAI has the potential to increase efficiency, improve decision making and foster innovation. With these benefits come potential risks, however, including data protection breaches, intellectual property rights issues, the protection of confidential or commercially sensitive information, ethical considerations and compliance with wider legal obligations.
- 1.3 The purpose of this policy is to provide a positive and informed framework for WWHC’s use of GenAI to ensure we maximise its benefits and use it in an ethical, secure and responsible manner, while minimising any risks or concerns.
- 1.4 The Director has overall responsibility for the consistent application, effective operation and awareness of this policy.

2. Scope

- 2.1 This policy applies to all employees, agency workers, committee members, consultants and contractors.
- 2.2 This Policy further applies to any use of GenAI for our business purposes, both during and outside your normal hours of work, on your own or one of our devices, and whether at your home, in our office or from a remote or mobile working location.
- 2.3 This Policy supplements, and should be read in conjunction with, our other policies and procedures in force from time to time, including our:
- Data Protection Policy;
 - Information Security Policy;
 - ICT, Internet and E-mail Use Policy;
 - Communications Strategy;
 - Sustainability Policy; and
 - Tenant Participation Policy

3. Definitions

For the purposes of this Policy:

Generative AI (GenAI)	Means a type of AI which can be used to create new content (including text, code,
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	images, videos or music) (referred to as “output” in this Policy) based on data that it has been trained on. It uses machine learning algorithms to analyse and learn from large data sets in response to defined prompts to create new content;
Prompts	Means the inputs or queries that a user provides to generative AI to receive the required output. Prompts can be used by the generative AI applications to further train the LLM.
LLMs	Means “large language models”, which are a type of generative AI that can generate human like text in response to a prompt. They can use deep learning techniques and massive data volumes to generate a response; and
Hallucination	Means outputs produced by the LLMs, which may initially appear to be believable but are in fact high inaccurate or fabricated.

4. Risk Appetite

4.1 Low Risk, Low Innovation:

- 4.1.1 WWHC adopts GenAI cautiously, prioritising data security, compliance, and human oversight. GenAI tools will only be used for routine, low-impact tasks, following strict governance and approval processes. Innovation is limited to proven applications, ensuring tenant safety and regulatory adherence remain at the forefront of all AI initiatives.
- 4.2 WWHC will review and maintain its risk appetite in line with its Risk Management Policy and Strategy.

5. Authorised Tools and Applications

- 5.1 WWHC permit use of the following GenAI applications for our business purposes (referred to as “authorised GenAI applications” in this Policy):
- Microsoft Co-Pilot Enterprise when you are logged into your Microsoft 365 account with your credentials to enable enhanced data security and privacy matters.
- 5.2 If you consider that there is a GenAI application that should be an authorised GenAI application, you should submit a business case to the senior staff team for review and approval (See section 11 of this Policy).

- 5.3 Other publicly available GenAI applications and tools (e.g. ChatGPT, Google Gemini etc.) are not permitted for use within WWHC as the security and privacy of data cannot be guaranteed nor can the providers data retention policies be determined.

6. Permitted Use

- 6.1 Authorised GenAI applications must only be used for the following business purposes and only in accordance with the guidelines contained within section 6 of this Policy:

- Refining generic/repetitive/simple/non-personal emails and other communications
- Drafting presentations and reports
- Conducting research and data analysis and visualisation
- Automating repetitive tasks
- Idea generation (e.g. newsletter, annual report, website and other content for publication by us)
- Project planning

- 6.2 Use of authorised GenAI applications for any purposes not listed in paragraph 5.1 must be requested and approved in advance by your line manager or other senior staff member.

7. Guidelines for Use

- 7.1 Individuals must comply with the following guidelines when using authorised GenAI applications, including any third-party add-ons incorporated into authorised GenAI applications for our business purposes:

- 7.1.1 Confidential, commercially sensitive, or proprietary data relating to us or our customers, suppliers or contractors must not be entered into authorised GenAI applications as a prompt.
- 7.1.2 Personal data must not be entered into authorised GenAI applications as a prompt. If it is not possible to use it without this data, individuals must seek advice from the Data Protection Officer (DPO) before proceeding.
- 7.1.3 Data containing or protected by intellectual property owned by a third-party, such as copyright, database rights or trademark rights, must not be entered into authorised GenAI applications as a prompt without authorisation from the third-party.
- 7.1.4 Offensive, discriminatory or inappropriate content must not be entered into authorised GenAI applications as a prompt.
- 7.1.5 authorised GenAI applications must not be used to generate offensive, explicit, discriminatory or inappropriate content.

- 7.1.6 strong passwords must be used to secure access to your authorised GenAI application account.
- 7.1.7 apply all software and security updates to the authorised GenAI application as and when they become available.
- 7.1.8 authorised GenAI applications must not be used to undertake automated decision-making in relation to individuals, including the assessment of housing applications, tenancy sustainment, processing complaints, recruitment or other human resource matters.
- 7.1.9 critical thought, fact and sense checking must be applied to outputs before relying on them for business purposes to ensure content is appropriate, accurate and up to date. GenAI has the potential to produce incomplete and inaccurate outputs or hallucinations based on the ingestion of vast data sources, some of which may be fiction. The output may also be biased, discriminatory, trained on stereotypes, inappropriate, offensive or otherwise illegal.
- 7.1.10 authorised GenAI applications must be used ethically and responsibly in a manner that protects WWHC's reputation at all times.
- 7.1.11 outputs must not be generated to impersonate, bully or harass another person, or to engage in any behaviour that would be illegal or in breach of the Code of Conduct.
- 7.1.12 authorised GenAI applications must not be used as a substitute for advice that we would normally obtain from licensed professionals including our accountants, solicitors and other consultants. Similarly, authorised GenAI applications must not be used to draft or product such documents that WWHC may receive or use from any of the above licensed professionals; and
- 7.1.13 guidance issued by the Scottish Housing Regulator and the Information Commissioner, or other regulatory body, on GenAI must be complied with when using authorised GenAI applications.

8. Data Privacy and Security

- 8.1 Users must not input personally identifiable information (PII), financial data, or confidential tenant information into GenAI tools. For the avoidance of doubt only those listed on the 'Approved List' or approved 'GenAI Use cases' should be used. The input of personally identifiable information (PII), financial data, or confidential tenant information into public GenAI tools will be considered a reportable breach in accordance with GDPR and a breach of the Generative AI acceptable usage policy.
- 8.2 All data processed by GenAI must comply with WWHC's Data Protection Policy and GDPR requirements.

9. **Monitoring**

9.1 We may monitor any content (including any prompts and outputs) within any authorised GenAI application to the extent permitted by law to comply with a legal obligation or for our legitimate business purposes, including to:

- prevent misuse and protect confidential information, commercially sensitive information and personal data belonging to us or third parties.
- ensure compliance with our Rules, Code of Conduct and policies (including this Policy).
- monitor performance at work.
- ensure that authorised GenAI applications are not used for any unlawful or unauthorised purposes or activities that may damage our business or reputation; and
- comply with intellectual property law and enforce and protect proprietary rights in outputs.

9.2 Paragraph 9.1 is without prejudice to our right to conduct monitoring under our other policies, including our ICT, Internet and E-mail Use Policy.

10. **Transparency, Accountability and Oversight**

10.1 When using outputs of authorised GenAI applications either directly or with minor alterations, the output must be annotated with the following:

"This document or parts of this document contain content generated by Artificial Intelligence (AI). AI generated content has been reviewed by the author for accuracy and edited / revised, where necessary. The author takes responsibility for this content."

10.2 When you use authorised generative AI applications to generate content, you are responsible for the output generated and accountable for any decisions that you make based on that output.

11. **Training**

11.1 You must complete mandatory training before using authorised GenAI applications.

11.2 Failure to complete the mandatory training constitutes a breach of this Policy.

11.3 For technical support in accessing and using authorised GenAI applications, please contact WWHC's IT support provider.

12. Identification of Potential GenAI Use Cases

- 12.1 A use case is a specific scenario or application in which GenAI technology is proposed or used to solve a business problem or improve a process.
- 12.2 The use case review process provides a structured procedure for proposing, evaluating, and approving new GenAI applications in accordance with WWHC's risk statement. It ensures responsible adoption by assessing compliance, risk, and alignment with organisational values. This process safeguards data, promotes ethical innovation, and maintains transparency, accountability, and strategic consistency across all GenAI activities.
- 12.3 The below provides a high-level outline of the use case review process:
1. All new GenAI use cases must be formally proposed before implementation.
 2. Staff to submit a written proposal detailing the intended use, benefits, data requirements, and potential risks (See Appendix 1).
 3. Proposals will be reviewed by the senior staff team and any other staff member or consultant that the senior staff team deems appropriate.
 4. The Senior Staff team will assess each proposal for alignment with WWHC's values, legal and regulatory requirements, data protection standards, and risk appetite.
- 12.4 The review process includes technical due diligence, ethical impact assessment, and stakeholder consultation.
- 12.5 Only use cases meeting standards for security, transparency, and accountability are approved for deployment.
- 12.6 The senior staff team will document its decision and provide feedback to the proposer, ensuring a clear audit trail and ongoing oversight of GenAI activities.

13. Actions Upon Approval of GenAI Use Cases

- 13.1 Following approval and when first using an authorised GenAI application, you must select any opt out options to prevent the data you enter within the prompt being used by the LLM to train itself. If the opt out selection is unclear or it not available within the authorised GenAI application, please contact your line manager or IT support for advice.

14. Consequences of Failure to Comply

- 14.1 We take compliance with this Policy seriously. Suspected breaches of this Policy will be investigated in line with WWHC's Disciplinary and Grievance Policy (or as appropriate for Committee Members, volunteers, consultants or contractors). Where disciplinary action is appropriate, it may be taken whether the breach is committed during or outside normal working hours and whether use of generative AI is on your own device or one of our devices, and whether at home, in the office or from a remote or mobile working location.
- 14.2 You must co-operate with any investigation into suspected breach of this Policy. This may involve providing us with access to any GenAI application (whether this is an authorised GenAI application) and any relevant passwords and log-in details.
- 14.3 You must report any breach of this Policy immediately to your line manager.

15. Equalities

- 15.1 We are committed to ensuring equal opportunities and fair treatment for all people in our work. In implementing this Policy, we will provide a fair and equal service to all people, irrespective of factors such as gender, race, disability, age, sexual orientation, language or social origin, or other personal attributes.

16. Review

- 16.1 Given the pace of technological development in this area and to address evolving uses and understanding of GenAI, this Policy will be reviewed annually.

Appendix 1 – Business Use Case Template

Proposer Name/Role:

Date of Submission:

Title of Proposed GenAI Use Case:

Description: Briefly describe the intended GenAI application, including its purpose, scope, and expected benefits.

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Data Requirements: Specify what data will be used, including any personal or sensitive information.

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Anticipated Risks: Outline potential risks (e.g., data privacy, bias, operational impact).

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Initial Screening

Is the proposed tool on the Approved GenAI Tools List?	☐ Yes ☐ No
Does the use case align with organisational values and IT strategy?	☐ Yes ☐ No
Is there a clear business need or benefit?	☐ Yes ☐ No
Initial Reviewer Comments:	

Senior Staff Assessment

Date of assessment panel review: DD/MM/YY

Attendees: (Include representatives from IT, Risk/Compliance/Legal, and relevant operational teams)

Assessment Criteria Checklist:

Compliance with legal and regulatory requirements (e.g., GDPR)	
Data protection and security standards	
Ethical considerations (e.g., bias, fairness)	

Technical feasibility and integration	
Impact on tenants and staff	
Risk appetite and mitigation measures	
Equalities Impact Assessment	

Decision and Feedback

Decision:	☐ Approved ☐ Approved with Conditions ☐ Rejected
Conditions (if any):	
Feedback to Proposer:	

Documentation and Audit Trail

Record of Review: (Attach completed template to central GenAI use case register)

Review 1: DATE	
Review 2: DATE	
<i>Add additional rows as required...</i>	

Follow-up Actions and Documents: (e.g., implementation plan, training, monitoring requirements)

Action 1: XX/XX/XXXX	
Action 2: XX/XX/XXXX	
<i>Add additional rows as required...</i>	

Equalities Impact Assessment

Policy/Project/Service Information			
Lead Officer	Corporate Services Officer		
Policy / Project / Service	AI Policy	New Policy / Project / Service or revision of existing?	New
Is this a reassessment following amendments being required at a previous assessment?	No		
Briefly describe the aims, objectives and purpose of the policy / project / service.	To provide guidance on the acceptable use of Artificial Intelligence (AI) within West Whitlawburn Housing Co-operative		
Who is intended to benefit from the policy / project / service? (E.g. applicants, tenants, staff, contractors)	All stakeholders		
What outcomes are wanted from this policy / project / service? (E.g. the measurable changes or benefits to members/ tenants / staff)	To increase efficiency, improve decision making and foster innovation as well as improved customer service.		

Consultation
Who have you engaged and consulted with as part of your assessment? Communications and Participation Working Group

Equalities Impact Assessment Sources cited: Information Commissioners Office (Feb 2025), Skills Development Scotland (July 2025), Equality and Human Rights Commission (March 2025)

Which protected characteristics could be affected by the policy, practice, or service?		Identify any positive impact/s that could result for each of the protected characteristic groups.	Identify any negative impact/s that could result for each of the protected characteristic groups.
Age	x	User interfaces of AI, specifically M365 Copilot in this assessment, are typically easy to use, have simple lay outs and do not require advanced digital skills. Therefore, AI is accessible by all age groups.	Adoption of AI could have a greater negative impact on older people who are less technology literate whereby they struggle to adopt new methods of working, supported by AI and its solutions.
Disability	x	Adoption of AI could support neurodivergent people who struggle with e.g. note taking and data analysis and other accessibility needs. It can further help dyslexic individuals by using spelling and grammar checks e.g. composing emails and reports. Microsoft Copilot is also compatible with screen readers to support those who are blind, visually impaired or have learning difficulties. Other positive outcomes include those with visual / hearing impairments can experience automated transcriptions, real-time editing and text simplification.	
Gender Reassignment			
Marriage & Civil Partnership			
Race			
Religion/Belief			
Pregnancy/Maternity			

Sex			
Sexual Orientation			
All	X		AI adoption can inherit biases based off their training data / the user. As such the information provided by them can be biased, without the user realising. As a result, all protected characteristics may be negatively impacted in one way or another.

Action Plan To Mitigate Negative Impact		
What action/s are required to address the impacts arising from this assessment?		
Protected characteristics	Action	Implementation Date
Age	GenAI is not mandatory throughout WWHC for individuals and their workloads. It is seen a tool to support work rather than replace individual roles and functions. Staff can use this at their leisure and training is to be provided on proper use.	
Disability	Initial training and awareness	
Gender Reassignment		
Marriage & Civil Partnership		
Race		
Religion/Belief		

Pregnancy/Maternity		
Sex		
Sexual Orientation		
All	The Policy sets out the requirement that GenAI is used for drafting reports, proposals and content etc and must not be used for decision making (e.g. housing applications, HR decisions). The Policy further outlines that all GenAI outputs must be checked by a human for sense and accuracy. Further, no automated decision making is present in any WWHC department or software (e.g. decisions taken regarding housing applications are subject to the Allocations policy and reviewed by 2 members of staff).	From policy approval with regular training and periodic reminders.

Final Decision	Tick relevant box	Include explanation where appropriate
Approved for implementation without change	x	
Amend or change the Policy/Project/Service		
Continue the Policy/Project/Service without change (despite impact)		
Stop the Policy/Project/Service		
Lead Officer Signature	R.Hosie	
Date	20/08/2026	
Date approved by Management Committee/ Sub Committee	31/08/2026	