

ARTICIAL INTELLIGENCE (AI) POLICY

Approved On	October 2025
Review Date	October 2026

1. INTRODUCTION

1.1 This policy sets out West of Scotland Group's approach to using Artificial Intelligence (AI) to improve our processes and outcomes.

1.2 AI can be defined as the use of digital technology to create systems capable of performing tasks commonly thought to require intelligence.

1.3 AI is constantly evolving, but generally it:

- involves machines using statistics to find patterns in large amounts of data
- is the ability to perform repetitive tasks with data without the need for constant human guidance

Machine learning is a subset of AI, and refers to the development of digital systems that improve their performance on a given task over time through experience.

1.4 We think that AI can benefit WSHA Group (initially) in a number of ways:

- provide more accurate information, forecasts and predictions leading to better outcomes
- improve our customer services
- automate repetitive and time-consuming tasks which frees up valuable time of frontline staff

POLICY LINKS

- Data Management Handbook
- ICT Security Policy
- AI Data Protocol

2. POLICY PRINCIPLES

2.1 WSHA will adopt the following principles when using AI:

- Uphold principles of fairness, accountability, transparency, and privacy in all AI-related activities.
- Ensure that AI systems are developed and deployed in a manner consistent with West of Scotland Group's mission and values.
- Adhere to all relevant laws and regulations governing the use of AI technologies, including data protection and privacy regulations.
- Implement robust data privacy and security measures to protect sensitive information, if collected or used by AI systems.
- Regularly audit and review data handling practices to ensure compliance with relevant regulations and standards.

- Ensure that AI systems are transparent and explainable, providing clear explanations of how decisions are made and the rationale behind them.
- Make information about AI systems, including data sources and algorithms, readily accessible to our stakeholders.
- Proactively address and evaluate biases in AI systems to ensure fairness and equity, particularly.
- Clearly define roles and responsibilities for the development, deployment and oversight of AI systems within the Group.
- Prioritize the safety and reliability of AI systems, particularly in critical applications such as public safety.
- Conduct thorough testing and validation of AI systems to ensure they meet established standards for safety and performance.
- Invest in training programmes to build AI literacy and capacity within the organisation.
- Support efforts to promote diversity and inclusion in the AI workforce, recognizing the importance of diverse perspectives in AI development and deployment.
- Establish mechanisms for ongoing monitoring and evaluation of AI systems to assess their impact on our stakeholders, identify potential risks or harms, and make informed decisions about their continued use.
- Regularly review and update this AI policy to reflect advances in technology, changes in regulations and evolving ethical considerations
- Ensure that we measure and mitigate any environmental impact
- Ensure that we have clear protocols in place in respect of which AI tools are permitted to be used for work purposes
- Ensure we have robust process in place when using AI tools and personal data
- Ensure that we are being open and transparent about how we are using AI and the processes we have in place
- Ensure we keep up to date with the evolution of AI Technology and continually improving and maximising how we use AI

3. IMPLEMENTATION OF AI – INCLUDING ROLES & RESPONSIBILITIES

3.1 The implementation of AI projects will be managed by our AI Working Group (AIWG) of staff. This group will involve staff from across the organisation. The AIWG meeting is chaired by the Chief Executive. The main purpose of the group is to identify opportunities to make use of Artificial Intelligence Tools to:

- improve efficiency of internal processes and
- staff/customer communication and
- understand the potential risks that AI can present

3.2 Specific outcomes expected from the AI Working Group will be as follows:

- Develop skills and knowledge of AI Tools
- Agree which Tools we will use.
- Consider how AI can improve our processes and communication
- Prioritise opportunities identified and develop an action plan.
- Consider the risks of using AI
- Consider the benefits of using AI
- Consult with relevant staff before introducing new AI solutions.
- Communication with all staff on progress with AI solutions.
- Monitor outcomes of new AI solutions to confirm outcomes including assessing cost efficiencies.
- Provide a quarterly update to the IT Project Board
- Implementation of AI Data Protocol
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3.3 All proposed AI projects will be reviewed by the IT Project Board (made up of the Corporate Management Team and the IT Manager). The IT Project Board will have overall control and supervision of the actions and priorities of the AIWG and must sign off on any new (or significantly changed) AI Projects. Working Group member/s will produce a report for the ITPB which will demonstrate that outcomes have been tested prior to sign off.

3.4 Together with the AI Working Group, the IT Project Board will review outcomes of AI Projects. These will be reviewed at an agreed timescale relevant to each project.

3.5 The IT Project Board will ensure that new AI Projects are:

- ethically permissible – consider the impacts it may have on the wellbeing of affected stakeholders and communities
- fair and non-discriminatory - consider its potential to have discriminatory effects on individuals and social groups, mitigate biases which may influence our model's outcome, and be aware of fairness issues throughout the design and implementation lifecycle
- worthy of public trust - guarantee as much as possible the safety, accuracy, reliability, security, and robustness of its product
- justifiable - prioritise the transparency of how you design and implement your model, and the justification and interpretability of its and behaviours

3.6 We will report to Audit Committee quarterly on AI Projects.

4. AI RISKS

4.1 West of Scotland recognizes that AI involves new technology that brings significant risks in terms of outcomes and unintended consequences.

4.2 The main ways AI systems can cause involuntary harm are:

- misuse – systems are used for purposes other than those for which they were designed and intended
- questionable design – creators have not thoroughly considered technical issues related to algorithmic bias and safety risks
- unintended negative consequences – creators have not thoroughly considered the potential negative impacts their systems may have on the individuals and communities they affect

4.3 No AI Projects that impact on the lives of individuals or communities, particularly where they involve the processing of personal data, will therefore be approved by the IT Project Board or WSHA Board until we are confident that we have effective safeguards in place, to eliminate any possibility of bias in decision making. Where we do use personal data in the use of AI, we will carry out a Data Protection Impact Assessment before any use and ensure that the process is secure. We will not use ChatCPT for personal data and instead will use Microsoft Co-Pilot which is held in a secure environment. Where we use AI in respect of systems and software, we will ensure that the data is not shared with a third party and that data security is in place. We will not use AI for decision making and will ensure that there is always staff review before decisions are made in respect of both our customers and our employees.

5. EQUALITIES

5.1 We will not unlawfully discriminate against any person within the protected characteristic groups as contained within the Equality Act 2010. To ensure equal access to the information contained in this policy for all, we are happy to provide copies in Braille, in larger print, translated into other languages or on tape to you or anybody that you know upon request and where practicable.

5.2 WSHA will seek to ensure that AI Projects are managed in a manner that is fair to all sections of the community regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. We will complete Equalities Impact assessments as appropriate for each AI Project.

5.3 As with all Association policies and practices, the Association will adhere to Outcome 1 of the Scottish Social Housing Charter (Equalities): 'Social Landlords perform in all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.'

6. POLICY REVIEW

6.1 This policy will be reviewed annually to ensure that it is kept up to date in line with changes to AI.

If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Chief Executive will initiate an immediate review.

6.2 Where appropriate, key stakeholders such as tenants and interested parties will be consulted as part of any review of this policy.

6.3 This policy was approved by the WSHA Board on 29th October 2025.