REQUEST 19189

I am submitting an FOI request seeking to understand how public bodies are exploring or applying Artificial Intelligence (AI) to support service delivery. These questions are intended to gather insights into current practice, governance, and future planning. They should not be interpreted as critical; we are simply researching how public services are approaching emerging technologies. *Please provide answers to the following:*

1. **AI Use in Operations -** Does your organisation currently use any form of Artificial Intelligence (AI) or automated systems in its operations?
    - If yes, please list the tools or systems in use and provide a brief description of their purpose (e.g., administrative support, triage, analytics, chatbot services, etc.).
    - If not, please state whether your organisation has explored or piloted any AI-based technologies in the past 3 years.

RESPONSE

1. Yes.

- **QuickAction Base Platform**
  Enclosed AI platform (no internet). Built on a large language model. Detailed prompts saved in a prompt library. Summarising documents, comparing documents, rewriting text for specific audiences, sentiment analysis, matching criteria to applications, drafting correspondence.

- **Conversation to Assessment (QuickAction)**
  Mobile application that records conversations and transcribes them into a template. Works offline.

  Recording in-person conversations where connectivity may be limited, including situations where there is no fixed meeting time. Used for Adult Social Care Assessments.

- **EHCP Plus (QuickAction)**
  Pulls together all required information into a first-draft Education, Health and Care Plan (EHCP), saving significant officer time and reducing backlogs. Its purpose is to speed up EHCP production, improve statutory-timescale compliance, and free staff to spend more time supporting children and families, while ensuring strong data-protection controls.

- **Note Taker (QuickAction)**
  Meeting transcription tool linked to calendar. Joins meetings automatically and produces notes/minutes based on templates. Regular statutory meetings that need formal minutes.

- **Adult Social Care Virtual Assistant (Copilot Studio)**
  Public-facing chatbot (currently for Adult Social Care). Provides information and signposting. Answering public queries relating to Adult Social Care.

- **Microsoft Copilot Chat**
  Day-to-day queries, quick meeting minutes, brainstorming, idea generation, web research, document drafting and refining.

- **Microsoft Copilot 365**
  Evidence-based workers who need to retrieve and summarise information across multiple systems; creating structured meeting notes.

2. **AI for Decision-Making -** Does your organisation use AI or algorithmic systems to support or inform decision-making in any area (e.g., resource allocation, risk assessments, case prioritisation)?

   If yes, please describe the type of decision-making supported and the nature of the AI's role (e.g., advisory, automated assessment, automated decision).
   Please also confirm whether human oversight is applied.

2. Our AI policy explicitly states, "AI tools must not make decisions without human review and approval."

   Previously we have tested comparing various applications against defined criteria, using the AI to make recommendations, however these use cases have not progressed to date.

3. **AI Chatbots and Customer Interaction -** Does your organisation currently use chatbots or virtual assistants—AI-driven or rules-based—to support public enquiries or internal staff functions?

   If yes, please specify their purpose, whether they are AI-based, and when they were implemented.

3. We currently use the Adult Social Care Virtual Assistant (detailed above) for public enquiries. This went live in December 2025 and had previously been tested with members of the public. It is AI driven and is an information and advice tool.

   We have a rules-based internal chatbot (Unity) that works alongside our IT self-service portal for staff.

The 8x8 contact centre system currently utilises a rule-based chatbot however there are aspirations to explore an agentic chatbot in future.

4. **Policies and Governance -** Does your organisation have any formal policy, strategy, or guidance relating to the use of Artificial Intelligence or automated decision-making?

   If yes, please supply a copy or provide a link.
   If not, please indicate whether such a policy is in development.

4. Please see attached AI Policy.

5. **Data Protection and Ethics -** If AI systems are used, what measures or frameworks does your organisation have in place to ensure:

   Compliance with data protection and privacy obligations
   Transparency for service users
   Ethical or responsible use (for example, DPIAs, algorithmic impact assessments, ethical guidelines—if applicable.)

5. The AI Working group meets monthly to discuss anything that is using AI. The group consists of members from Digital, Information Governance (IG), Audit, Performance and Insight, Human Resources and Public Relations/Internal Comms. Following a review by this group, further reviews take place specifically with IG (for DPIA completion) and our Joint Architecture Group where any solution must have sign off from a technical and security perspective. Our use of AI is communicated on our website here: Wigan Council's use of Generative AI (GenAI) – plus, privacy notices are updated as advised by IG and staff work closely alongside service users to co-develop many of our solutions.

6. **Trials, Pilots, or Future Plans -** Has your organisation run any pilots, trials, or exploratory projects involving AI in the last 3 years, or does it plan to do so in the next 12–24 months?

   If yes, please provide brief details of the purpose, timeline, and status of these initiatives.

6. Future pilots include:
   - Extending our Conversation to Assessment Solution to Children's Services (currently in development)
   - Developing a prototype for a Freedom of Information Management Tool (prior to April 2026)

   There will be many other pilots taking place that are yet to be decided upon.

7. **Staff Training and Awareness -** Does your organisation provide any training, guidance, or internal communications to staff relating to AI, its use, or its implications?

   If yes, please describe the type of training or include documents if available.

7. We circulate regular internal communications to staff around the work that we are doing and encouraging staff to make use of the tools available to them (such as Copilot Chat). We are currently in partnership with Multiverse who have delivered some training to our staff corporately but are also running an AI Apprenticeship with an initial cohort of 30 staff members.

Wigan Council Artificial Intelligence (AI) Policy

Author: Rob Gregory
Date: 20th August 2025
Version: 1.0

Version Control

Document Title	AI Policy
Purpose	The purpose of this policy document is to provide a framework for the use of Artificial Intelligence within Wigan Council by council employees, Elected Members, contractors, temporary staff, consultants or other third parties on behalf of the Council.
Date of Approval	20/08/2025
Valid Until	19/02/2026
Owner	James Winterbottom
Approver	Rob Gregory
Distribution Method and Responsibility	Intranet/Hub; Internal Comms; Cascade from SMT as appropriate.

Version History	Date & Comments
1.0	30/07/2024 – Uplift to final major release
1.1	15/08/2025 – minor update, removing specific reference to Generative AI and removal of unused Annexes (draft)
2.0	20/08/2025 - Uplift to final release following approval of changes

Contents

1. Scope & Purpose

The purpose of this policy document is to provide a framework for the use of Artificial Intelligence (collectively referred to in the rest of this document as AI) such Copilot, QuickAction or other similar tools by council employees, contractors, temporary staff, consultants or other third parties, hereinafter referred to as 'staff" and Elected Members, hereinafter referred to as 'Members'.

This policy applies to all Wigan Council staff and Members using any AI tools in support of council activities or constituency work. These tools can be standalone or embedded in other tools – such as email clients or video conferencing tools. For example, Microsoft 365 includes many AI tools – such as Teams transcription.

This policy is designed to ensure that the use of AI is ethical, complies with all applicable laws, regulations, and council policies, and complements the council's existing data protection and information security policies. The pace of innovation and increasing application of AI is such that this policy will be in a constant state of development.

This policy should serve as a comprehensive guide for all staff and Members involved in the development, deployment, and utilisation of AI technologies within the council.

Staff and Members may use AI for work-related purposes if they adhere to the guidelines within this policy. For practical usage, an easy-to-use reference guide (policy key facts) is listed in Annex A.

2. General Principles of AI

2.1 What is GenAI

GenAI is a subset of artificial intelligence (AI) focused on creating or analysing new or existing content, such as images, text, audio, or videos, that closely resembles human-generated content. Unlike traditional AI systems that rely on rules-based programming or statistical analysis of existing data, AI models are trained on large datasets and learn to generate new content by identifying patterns, trends, and structures within the data. These models can produce highly realistic and diverse outputs, ranging from lifelike images and natural-sounding text to audio/video.

2.2 What is AI good at?

AI tools are extremely powerful, but they are not without limitations. The following provides a short breakdown of typical strengths and weaknesses:

Strengths:

- **Creativity and Innovation**: AI can assist in creative processes like generating text and images, boosting human creativity and accelerating the innovation process.
- **Efficiency and Automation**: AI can automate repetitive tasks, freeing up human time and resources for more complex work. This can include tasks like summarisation or making time gains in processes that involve complex comprehension of large quantities of data.
- **Personalisation and Customisation**: AI can personalise content based on individual needs and preferences, enhancing user engagement and satisfaction.

Weaknesses:

- **Misinformation and errors:** AI can be misused to create realistic looking but fake content, potentially spreading misinformation and manipulating public perception. Equally, the output from AI tools may appear to be factually correct, but on closer inspection turn out to contain errors.
- **Lack of understanding:** AI excels at pattern recognition and imitation, but it lacks the ability to truly understand the meaning and context behind its outputs. This can lead to nonsensical or misleading content.
- **At risk of security breaches:** AI models are potentially susceptible to security breaches as malicious actors may target them with what's known as an "injection attack". This is when an attacker secretly inserts malicious instructions into a AI application to retrieve sensitive information or compromise systems
- **Not a panacea:** AI is not the answer to all problems, and there are a wide range of technologies (such as automation, data analytics) that in many cases will be more appropriate to solve a particular problem or should be used in conjunction with AI.

2.3 Regulation and Legislation

Given the power of AI it is important to use it safely and responsibly, a fact which is recognised by the UK government. There is currently no explicit AI legislation in the UK. However, existing legislation such as the Human Rights Act 1998, the Data Protection Act 2018 and the UK GDPR are relevant to the usage of AI tools. This policy will be reviewed in light of any future legislative, regulatory or case law changes

The previous UK government's preference was to place the obligation on existing regulators to produce AI-specific guidance within their respective domains. Regulators that will produce AI guidance[1] with relevance to Wigan Council are:

[1] https://www.gov.uk/government/publications/regulators-strategic-approaches-to-ai/regulators-strategic-approaches-to-ai

- Information Commissioner's Office (ICO);
- Equality and Human Rights Commission (EHRC)
- Office for Standards in Education, Children's Services and Skills (Ofsted)
- Legal Services Board (LSB)
- Office of Qualifications and Examinations Regulation (Ofqual)
- Health and Safety Executive (HSE)
- Bank of England
- Office for Product Safety and Standards (OPSS)

Additional government organisations that may also produce relevant guidance are:

- NHS England
- Central Digital and Data Office (CDDO)
- Department for Levelling Up, Housing and Communities (DLUHC)
- National Cyber security Centre (NCSC)
- Cabinet Office
- Local Government and Social Care Ombudsman

It is also important to note that data controllers/owners may also set restrictions on the use of their data with respect to AI and AI tools. HMRC, DWP and Home Office all prohibit Local Authorities to use their data (or derived data) for use in automated decision making.

When relevant guidance is released, it will be reviewed and, where appropriate, will be factored into future revisions of this policy.

In addition to guidance from regulators, the UK government has released a series of pieces of guidance, none of which have legislative standing, but may still be useful to familiarise with. At present, the most relevant documentation to have been released from government in the UK is:

- AI Framework for HMG[2]
- A pro-innovation approach to AI regulation: government response[3]
- AI Guidance (NCSC)[4]

2.4 Ethics of using AI

As well as being a useful tool for the council, AI presents ethical challenges. Many of these challenges relate to the potential impact on the citizens, staff and Members of Wigan. Many of these are not necessarily specific to AI and

[2] https://www.gov.uk/government/publications/generative-ai-framework-for-hmg/generative-ai-framework-for-hmg-html
[3] https://www.gov.uk/government/consultations/ai-regulation-a-pro-innovation-approach-policy-proposals/outcome/a-pro-innovation-approach-to-ai-regulation-government-response
[4] https://www.ncsc.gov.uk/section/advice-guidance/all-topics?topics=Artificial%20intelligence&sort=date%2Bdesc

share common ethical risks to workflows involving any kind of “automated decision making”.

Ethical considerations are key to the utilisation of AI use cases, and practical steps that need to be followed are listed in section 3. The key themes that staff need to be aware of are as follows.

2.4.1 Transparency

Transparency about the use of AI is critical to maintaining trust among staff, Members and citizens and to mitigate risks of unfair decision making. Depending on the specific use of AI, this transparency could cover:

- The setup of the AI system and processes, including the tools used, data used and any applicable monitoring mechanisms
- Why the AI system is being used and how the outputs are processed, including reference to the fact that staff and Members of Wigan Council will never use AI to make decisions without human oversight.
- The safety record of the AI system with reports around complaints, and any errors that have been found
- How the system is audited, and how long information is retained for

Service Privacy Notices should be updated to include any use of AI in processing personal data.

2.4.2 Explainability and Recourse

Explainability involves the ability to explain the underlying reasoning and factors influencing AI-driven decisions, enabling stakeholders and residents to comprehend and evaluate the outcomes. This entails providing clear and accessible explanations of how AI systems operate, the data used, and the rationale behind their outputs.

Where applicable, recourse mechanisms are established to provide avenues for individuals affected by AI decisions to seek clarification, raise concerns, and challenge outcomes if necessary. These mechanisms serve as safeguards against potential biases, errors, or adverse impacts resulting from AI algorithms, ensuring that individuals have the ability to understand and contest decisions that affect them.

2.4.3 Ensuring Fairness and Bias Mitigation

Upholding fairness in the context of AI involves ensuring that outputs are impartial and do not exacerbate existing societal disparities based on factors such as race, gender, or ethnicity.

To achieve fairness, it's crucial to identify and mitigate biases that may arise in AI systems, particularly in text, images, audio, and video content. These biases can perpetuate harmful stereotypes or discriminatory treatment against certain social groups. Given that AI systems are developed and

operated by humans, who themselves are influenced by biases and societal contexts, addressing bias requires careful consideration at every stage of the AI lifecycle. Mitigating these issues involves crafting inclusive prompts, diversifying training data where practical while ensuring that reference data used within AI tools is valid, and implementing testing to evaluate the system's response to different inputs. Human in the loop validation can also ensure that outputs from AI tools are fair and unbiased.

2.4.4 Accuracy and Misinformation

AI tools present a risk to information accuracy through the phenomenon of 'hallucination', whereby AI models present information as fact, even though it may be inaccurate. While no human is likely to be infallible either, it is important to understand the impact of information inaccuracy in given workflows, such that the risks can be mitigated. Different AI techniques are available to reduce the likelihood of inaccurate outputs, and thorough testing is always needed.

Equally, AI tools can be intentionally misused to propagate misinformation. It is important that safeguards are in place to mitigate this threat.

2.4.5 Human Oversight and Intervention

A key tenet of all automated decision-making workflows, with the inclusion of AI, is the concept of 'human in the loop'. This means that with AI workflows it will be important to have a human review step prior to acting upon AI-produced output, or to have the ability for a human to quickly step in and assess whether a decision made by a AI tool was correct. Maintaining this human oversight is critical to ensuring that staff and citizens have faith in AI tools. The level of oversight needed will vary between use cases but will always be present.

2.4.6 Accountability

Following on from the need for human oversight, accountability and responsibility for the use of AI needs to be embedded across the lifecycle of AI usage, to ensure fair, legal and responsible use.

- Approval: Ensuring that tools are to be used legally and in compliance with policies (listed in section 4)
- Usage: Roles and responsibilities for the providers and users of AI tools are clear and adhered to
- Monitoring: Ensuring that tools are adequately monitored throughout their lifecycle

3. AI Use Cases

3.1 Recording AI Use Cases

An AI "use case" refers to the deployment of a specific AI tool to solve a specific problem (or set of problems). All AI use cases at Wigan Council need to be recorded in the AI use case log. As part of that process, if this is the first time a use case has been encountered, it needs to follow a simple assessment/approval process and depending on the outcome of that assessment, certain mitigating actions need to be taken.

You should discuss your potential use case with your Digital Transformation Lead, who will check if the use case already exists in the use case log and if not, they will add this in for you, to be reviewed by the AI Working Group.

3.2 Assessing the Risk of AI Use Cases

AI usage at Wigan Council can be categorised into three levels:

Red: A use case that is not permitted

Amber: A high-risk use case that needs to go through specific checks the first time it is deployed, and with specific requirements for ongoing monitoring

Green: A use case that is approved without full checks and simplified monitoring (tooling may still need to be approved separately)

AI Use Cases are governed by the AI Working Group. A full list of Use Cases can be found here. This list will be reviewed every 6 months and otherwise updated as necessary.

In all instances, Use Cases must only use approved AI-capable solutions/tools.

3.2.1 Red

A use case is **banned** (i.e. graded red) if it exhibits any of the following:

- Breaks the law
- Runs contrary to current regulation around AI or current Wigan Council policies
- Poses an unacceptable risk to the human rights of Wigan staff or residents. Unacceptable risks currently include:
- Using purposefully deceptive techniques to alter a person's behaviour
- Utilising biometric categorisation to infer a protected characteristic or other sensitive personal information
- Monitoring behaviour of staff or residents without their knowledge to capture data for use with AI tools
- An automated end-to-end decision-making workflow with no human oversight
- Uses an AI solution/product which has not been authorised by Wigan Council on a personally owned device to process Council data

3.2.2 Amber

A use case is **high-risk** (i.e. graded amber) if it exhibits any of the following:

- Potential for causing serious harm to health or safety of a person
- Intended to influence decision making about a person
- Risk of adverse impact to a person's human rights
- Risk of financial harm to the council

Amber use cases must follow the process listed in 3.3.2.

3.2.3 Green

A use case is **low-risk** (i.e. graded green) if it could not conceivably cause harm to a person and is not intended to influence the outcome of decision making that impacts upon an individual. Such use cases would be:

- Simple procedural tasks
- Improving the result of a previous human-driven activity, such as reviewing a document that was drafted by an employee
- Performing a preparatory step to an assessment that is relevant to an amber use case, where a human is completing the activity

Green use cases must follow the process listed in 3.3.3.

3.3 Proceeding with a Use Case

The following section outlines next steps for red, amber and green use cases.

3.3.1 Requirements for a Red Use Case

This use case **must not** proceed. If you disagree with a rating that has been applied to a previously reviewed use case, please raise with your Digital Transformation Lead.

3.3.2 Requirements for an Amber Use Case

Amber use cases are judged to present a high-risk to staff or citizens, and therefore a series of steps must be undertaken to ensure the safe and responsible use of AI.

Amber use cases need to be reviewed prior to deployment.

Amber Use Case Review:

1) Assign a use case lead (Senior Responsible Officer), a named person who is accountable for the use case, takes responsibility for the completion of the Use Case Record, and acts as a point of contact for queries about the use case.

2) A project plan must be produced for the use case covering deployment, testing, validation and ongoing monitoring. You may like to use a published AI-specific framework (but this is optional)[5]. See Annex B for an example.
3) When a tool (or tools) have been selected for the use case, the terms of use and instructions for use of the systems must be reviewed and understood, to ensure that the correct procedures are followed
4) Ensure that tools satisfy the requirements set out in section 4 of this policy, including JAG approval if the tool has not previously been approved
5) You **must** complete a Data Protection Impact Assessment screener with the involvement of the Information Governance team, if personal data is being processed. If in doubt, please seek advice via legalinformationgovernance@wigan.gov.uk. You may also choose to do an AI risk assessment, but this is optional[6]
6) Where a workflow involves automated decision making, a copy of the Algorithmic Transparency Recording Standard[7] **must** be completed (a decision can be made on whether to publish it, either in full, or redacted)
7) Support, feedback and error reporting structures must be in place for the tool(s), both for users and for staff in a 'human in the loop' role
8) It must be made clear to users / subjects of the tool that AI is being used within the use case
9) Set a review of the use case, at minimum every 6 months

3.3.3 Requirements for a Green Use Case

Green use cases are judged to present a low risk to staff or residents. While a full review of the use case as outlined for 'amber' use cases could still be carried out, the only mandatory areas to complete are:

1) Ensure the use case is logged in the Use Case Log – contact your Digital Transformation Lead
2) Complete a DPIA screener, if personal data is being processed. (if the use case then requires a full DPIA, it is an Amber use case)
3) Ensure the terms of use and instructions for use of the systems have been reviewed and understood, to ensure that the correct procedures are followed
4) Ensure that tools satisfy the requirements set out in section 4 of this policy, including JAG approval if the tool has not previously been approved
5) It must be made clear to users / subjects of the tool that AI is being used within the use case
6) Set a review of the use case, at minimum every 12 months

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[5] For example, the process-based governance framework produced by the Alan Turing Institute https://www.turing.ac.uk/sites/default/files/2024-02/process_based_governance_in_action_0.pdf
[6] For example, the ICO AI and Data Protection Risk Toolkit, https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/artificial-intelligence/guidance-on-ai-and-data-protection/ai-and-data-protection-risk-toolkit/
[7] https://www.gov.uk/government/collections/algorithmic-transparency-recording-standard-hub

It is intended that Green use cases will work on a system of self-assessment, with periodic review by the **AI Working Group**. However, self-assessment will only commence once the AI Working Group determine there is sufficient understanding of AI across the organisation. Until this point, all use cases will be reviewed and approved by the AI Working Group.

4. AI Tooling & Services

It is important that any AI tools used by staff are reviewed against this guidance prior to use, as part of the process of assessing use cases in section 3.2.

All AI tools are subject to approval by JAG, the standard technical approval process and must adhere to relevant IT policies (see below). If the tool you want to use is not listed in the list of Approved AI-capable solutions/tools, it **must not** be used until approval has been granted by JAG.

The primary policies stipulating requirements for usage of IT at Wigan Council are the following, which take precedence to this policy:

- Data Protection Policy
- Information Security Policy
- IT Acceptable Use Policy
- Information Governance Framework
- Data Handling & Transfer Policy
- Cyber Security Policy
- Software Policy
- Access Control Policy
- Backup Policy
- Anti-Malware Policy
- Computer Misue Act

4.1 AI-related Safety Features

To ensure the safe and responsible usage of AI, there is a set of features that AI tools should exhibit, depending on use case, that should be incorporated into your AI workflow as necessary:

- **Audit logs**. Tools must record usage, ideally including records of prompts. The detail of the logs should be proportionate to the risk of the use case (i.e. amber use cases will require more detailed records). Audit capability and retention of data (including prompts and outputs) for each tool must be referenced in documentation supporting your request to use the tool.
- **Instructions for use**. Tools must provide instructions/documentation that outline procedures for safe usage
- **Safety checks**. Products should include built-in checks to prevent the tool from being used to produce harmful content

- **Monitoring**. In high-risk (amber) use cases the tool should include monitoring that enables alerting in case of errors.

4.2 Data Security

As well as the general information security / IT security risks posed by insecure tools, there are some specific additional risks posed to Council data from the use of AI tools.

AI tools should **not be used** unless they have an explicit statement that lets the user know whether or not the vendor seeks to use any data they provide (both in terms of *prompts* or files) for other purposes such as improving their service, or further training of AI. Ensure that if you are using a tool where data will be used for further training, that you would be happy for the data to be released in the public domain.

Personal and/or sensitive data should **not be used** with any AI tools unless there is an explicit statement that the data will not be used for further training of the AI models, as there is a risk of exposing data. Further requirements on the use of personal data are listed above in section 3.

Ensure that you understand where the tool/service you are using is located. It is preferred for AI services to be hosted in the UK, so that data remains in the UK (for instance, in a UK-based cloud region).

4.3 Terms & Conditions, Contractual and Intellectual Property Rights

Prior to using any AI tools it is important to be aware of the specific contract and terms of use that Wigan Council is bound to by using the products and data. The kinds of obligations to be aware of include:

- Age of users
- Restrictions on use, both in terms of workflows and data that can be used within the system
- Ensuring users accurately log their credentials
- Limits of liability
- Indemnities
- Copyright

Do not use a tool or data if any of the terms and conditions conflict with Wigan Council's policies and legal and regulatory responsibilities. Ensure that the data owner/controller has granted permission for use with AI tools.

When using an AI tool that creates new material (text, images, video, data, code, etc.) ensure you understand the implications for ownership of the resulting material. Different tools have different contractual terms for ownership, and you need to understand if the output you have produced falls under the contractual ownership of Wigan Council. If a tool/product/platform

suggests that ownership of the output remains with the vendor, it would not be recommended to use it.

AI models are often trained on large corpuses of material that have been automatically gathered ("scraped") from the internet, without the explicit approval of the owners of the material. In the UK there is currently no explicit court ruling as to whether this approach falls under the concepts of "fair use" or "fair dealing", and the implications on the development and usage of AI tools that take this approach with training data. At present, it is not recommended to train AI tools/models on material where Wigan Council is not the copyright owner, but using tools that have, in turn, been trained on such material is currently acceptable.

Greater clarity is expected later in 2024 from the courts and this policy will be updated as more information is known.

4.4 Standards & Accreditation

At present there are no specific AI standards expected of vendors.

5. AI Oversight & Policy Governance

Across Wigan Council, various roles and responsibilities are relevant to the implementation and adherence to the AI policy. Anyone who uses AI tools is responsible for understanding their own obligations. This policy will initially be updated bi-annually.

Relevant groups, roles and responsibilities are set out below:

AI Working Group: A committee comprised of a representative from Digital Services, Information Governance and Audit. This team is the primary group responsible for approving and reviewing AI use cases. It is intended that various stakeholders from across the organisation will join the working group from time to time, to help shape thinking and adoption of AI solutions and use case development.

Use Case SROs: Each amber use case will have a named person who is accountable for the use case, takes responsibility for the completion of the Use Case Record, and acts as a point of contact for queries about the use case

Tool Approval: AI tools are approved by **JAG**. More on the JAG process can be found on the Wigan Council intranet. All approved tools/solutions can be found in the List of approved AI-capable solutions/tools

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AI Policy Owner: This policy is owned by the SIRO through the oversight of the Digital Board

Policy Approval: The policy is approved **at the Digital Board.**

Users: are responsible for using AI tools in accordance with this policy.

Annex A – Policy Key Facts

AI is a subset of artificial intelligence focused on synthesising new content such as images, text, audio, or videos, that closely resembles human-generated content. The AI policy applies to all staff and contractors at Wigan Council using AI technology for work purposes.

There is currently no explicit legislation around the use of AI. Instead, use of AI is governed by existing laws such as the Human Rights Act and data protection legislation. Regulators such as the ICO are producing detailed AI guidance to be released by late Spring 2024. This policy encapsulates current best-practice from the UK government and will be updated as more detail emerges.

There are some specific ethical risks to be aware in relation to AI, including transparency, explainability, fairness, accuracy, human oversight and accountability. It is important to understand how usage of AI impacts on staff and citizens across those themes. More detail is provided in section 2.4.

All AI use cases at Wigan Council must be logged in the AI use case log, and only use tools approved by JAG. The use case log lists the intended use, relevant tools and appropriate risk rating.

AI use cases at Wigan Council are risk rated in three ways:

- **Red.** Use cases that are banned.
- **Amber.** High risk use cases that need to go through a full review process.
- **Green.** Low risks use cases that have a lightweight review process.

The primary distinction between amber/green use cases is whether AI is used to inform decisions about people, and if there's a risk of harm. The process for assessing risks is outlined in section 3.2, and the review process for use cases is listed in 3.3.2 (Amber use cases) and 3.3.3 (Green use cases).

Where use cases need to go through a full review, the process for doing so is set out in section 3. If a use case has already been through a review, details of this are captured in the use case log. Similar use cases can make use of the existing review, rather than needing to repeat it. In either case, it is critical that your use case is logged so that the [team] are able to understand how and where AI is being used across the council.

There are some specific expectations around the security of tools/systems used as part of AI processes, with particular risks to organisational data. Further detail is listed in section 4.

This policy is a live document and will be updated on a regular basis by the Ai Working Group, as AI technology is progressing at a rapid pace and regulation/legislation is also evolving at speed.

Annex B – Example AI Governance / Project Framework

The following high-level process log is taken from the Alan Turing Institute's *Process Based Governance in Action*.

Review Question	Response
Is it AI?	An evaluation of the product or service under review that concludes it is AI, with justification drawn from your AI definition.
Project Summary Report	A Project Summary Report that includes preliminary information about the project, data, intended uses, preliminary risk analysis, ethical deliberation, and relevant stakeholders.
Roles and Responsibilities	A record of the team members in the AI project including each person's role in the project and their responsibilities for its ethical design, development, and deployment.
Timeframes	Explicit timeframes for actions, follow-ups, reassessments, and continual monitoring.
Data Factsheet	Documentation of the data that will be processed by the system, including what is known about training data and the data the system will act upon and produce.
Context-Based Risk Assessment	A more complete analysis of risk factors and their anticipated scale, scope, and duration.
Stakeholder Engagement Plan (SEP)	A plan for engaging with stakeholders who will design, use, or and/or are affected by the AI system.
Stakeholder Impact Assessment (SIA)	Details of the ethical and other risks and harms that emerge from engaging with stakeholders.
Readiness Self- Assessment	Responses to the Readiness Self-Assessment tool.
SSAFE-D Core Attributes Identification	An inventory of the SSAFE-D Principles broken down and operationalised as Core Attributes. Note: SSAFE-D stands for Sustainability, Safety, Accountability, Fairness, Explainability, and Data-Stewardship
Bias Self- Assessment	Responses to the Bias Self-Assessment tool.

Annex C – Glossary of Terms

- AI: A subset of artificial intelligence (AI) focused on creating, generating, or synthesising new content.
- Rules-based Programming: A programming approach where systems follow a set of predefined rules to perform tasks or make decisions.
- Datasets: Collections of data used for training machine learning models.
- Training Data: The data used to train machine learning models, which typically consists of examples or instances along with their corresponding labels or outcomes.
- Recourse mechanisms: Procedures or channels established to provide individuals with avenues for seeking clarification, raising concerns, and challenging decisions made by AI systems. These mechanisms aim to ensure accountability, fairness, and transparency in AI-driven processes.
- Hallucination: A phenomenon in which AI models produce outputs that appear realistic but may lack factual accuracy, posing a risk to the reliability and trustworthiness of generated content.
- Data Sovereignty: The concept that data is subject to the laws and regulations of the country in which it is collected or processed, ensuring that data remains under the jurisdiction of the originating country's laws.
- Auditability: The ability to demonstrate the responsibility and trustworthiness of the development and deployment practices of AI systems, including robust reporting, documentation protocols, and traceability throughout the AI lifecycle.
- Algorithmic Transparency Recording Standard (ATRS): A standard framework used by public sector bodies to ensure that information about algorithmic solutions, including AI, used by the government and public sector, is clearly accessible to the public.
- Data Protection Impact Assessment (DPIA): An assessment carried out to identify and mitigate risks associated with the processing of personal data by AI systems, ensuring compliance with data protection legislation and safeguarding individuals' rights.
- Biometric Categorisation: The process of classifying individuals based on their biometric characteristics, such as fingerprints, facial features, iris patterns, or voiceprints.
- Indemnities: Legal provisions within contracts or agreements that offer protection against potential losses, damages, liabilities, or legal claims arising from the use of AI tools.
- JAG: Wigan's Joint Architecture Group provides guidance and assurance to the organisation regarding new / upgrades to existing technology solutions, products, tools, pieces of software and Line of Business applications, along with providing recommendations outlining how these can be used safely within the organisation. JAG's aim is to help the business to operate in the most efficient way possible whilst at the same

time minimising the security risks which implemented solutions may present.