

Supplement to the agenda for

Council

Friday 9 October 2026

10.00 am

**Conference Room 1 - Herefordshire Council, Plough Lane
Offices, Hereford, HR4 0LE**

6. QUESTIONS FROM MEMBERS OF THE COUNCIL

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INFORMATION GOVERNANCE STEERING GROUP

TERMS OF REFERENCE

Chair:	Director of Governance & Law
Administrator and Secretariat:	Information Governance Team
Frequency of Meetings:	Eight weekly
Format:	Meeting
Membership (<i>members will send a representative if unable to attend meetings</i>) Director – Governance & Law / SIRO (chairperson) Information Governance Manager Data Protection Officer Information Governance Officers IG Lead Community Wellbeing Directorate IG Lead Children & Young People Directorate IG Lead Economy & Environment Directorate IG Lead Corporate Services IG Lead IT / Digital When required: Caldicott Guardian – Community Wellbeing Directorate Head of IT, Hoople Information Security Lead, Hoople	

Overall aims

Keep the organisation safe and compliant in relation to information governance. To monitor performance, reporting issues and making recommendations to CLT regarding relevant policies, training and awareness, metrics and measures, data privacy impact assessments, IG toolkit(s) and ISO 27001, audits, incidents and risks.

To receive information on upcoming projects and procedures that require IG intervention from IG Leads.

To facilitate two way communication on key IG issues with directorates and teams.

To consider and take decisions regarding the ethical use of data, information and artificial intelligence in support of all council services and departments.

Key responsibilities

- To ensure that an appropriate comprehensive information governance framework and systems are in place throughout the organisation
- Annually review the policy set and amended where necessary
- Ensure appropriate information governance policies, standards and processes are in place to cover all aspect of Information Governance
- Monitor privacy impact assessments
- To report recommendations to CLT on information governance issues and risks, and where relevant on emerging ethical considerations in the use of data, information and artificial intelligence
- To oversee information asset management (including the information asset register and data protection register)
- To facilitate effective information sharing through protocols and agreements
- Monitor IG monthly metrics and measures e.g. FOI, SARS and Incidents
- To monitor and review the annual Information governance toolkit assessments for sign off by the Board.
- To coordinate the activities of data protection, confidentiality, security, information quality, records management and Freedom of Information responsibilities.
- To offer support, advice and guidance to the Caldicott Guardians and SIRO within the organisation.
- To oversee the mandatory Information Governance & Information Security training completion across the organisation.
- To receive and share information and feedback with departments and teams at an operational level through the IG Leads.

Reporting arrangements and delegation

- The group will report and make recommendations to the corporate leadership team.
- The group will take decisions relating to the ethical use of data, information and artificial intelligence.
- Directorates and teams will report forthcoming projects of note where there is an IG aspect.
- The group will report and make recommendations to teams on IG issues such as good practice recommendations or repeat data incidents that need to be addressed.
- A summary of points brought to the meeting and an actions matrix of actions and next steps will be recorded. Items of confidentiality will be noted separately.

Next Review: Annually



Information Governance Steering Group Members

Chair - Claire Porter, SIRO & Director of Governance & Law

Claire Jacobs, Information Governance Manager
 Sam Smith, Data Protection Officer
 Carrie Symonds, Business Support Manager (Children & Young People)
 Richard Vaughan, Sustainability & Climate Change Manager (Economy & Environment)
 Amanda Sherrard, Head of Business Support & Performance (Children and Young People)
 Leanne Edwards, HR Improvement Manager (Corporate Services)
 Jessica Karia-Fitzgerald, Head of Corporate Performance
 Jo Needs, Performance Team Lead (Community Wellbeing)
 John Gladman, Chief Digital and Information Officer
 Jason Cotton, Information Security Manager (Hoople)

Minutes sent to:

Hilary Hall, Caldicott Guardian & Director, Community Wellbeing
 Tina Russell, Director, Children and Young People

Using artificial intelligence (AI) policy

Version 2a, 8 April 2026 (approved version)

Owner: Chief Digital and Information Officer (CDIO)
Target audience: employees, councillors, contractors, and third parties working on behalf of the council
Last reviewed: 8 April 2026
Next review: by end March 2027

1 About this policy

Our artificial intelligence (AI) policy sets out how we use AI across the council, including M365 Copilot Chat, the only AI tool approved for all users. This policy outlines the principles we follow to make sure AI is used safely, ethically, and legally.

1.1 Who this policy is for

This policy is for anyone who uses AI for Herefordshire Council business purposes, including:

- employees
- councillors
- contractors
- third parties working on behalf of the council

Before using AI, it's important that you read and understand this policy, including the risks associated with AI.

1.2 What do we mean by AI

AI means any computer systems designed to perform tasks that typically require human intelligence. This includes but is not limited to:

- conversational AI like Copilot that can help with tasks like gathering information, drafting text and managing schedules
- AI powered chatbots that answer customer service questions
- robotic process automation (RPA), which uses AI to automate repetitive and rule-based tasks typically performed by humans
- voice assistants like Siri or Alexa, which understand and respond to spoken commands

AI can create realistic, human-like text, images, code and art based on the data it has been trained on. It responds to plain language questions and is very good at understanding different types of data.

1.3 Why we have this policy

This policy is designed to ensure that the use of AI is ethical, complies with all applicable laws, regulations, council policies, and complements the council's existing information and security policies.

This policy explains how we expect you to use artificial intelligence tools and systems while working at Herefordshire Council.

1.4 Review

This policy will be reviewed as necessary but at least annually and updated to ensure continued compliance with all applicable legislation, regulations and organisational policies.

2 How to use AI at work

Copilot is the only AI tool approved for use by all council employees (MagicNotes is also approved for some staff in Children's Services and Community Wellbeing). There are no other approved tools.

If you want to use any other AI tool, you will need to get permission to do that. In the first instance, contact the Information Governance team at informationgovernance@herefordshire.gov.uk.

When using AI, remember to:

- check anything AI produces to make sure it is accurate (you are responsible for documents produced or enhanced by AI so it is essential that you review and sign off those documents)
- not use AI to make decisions – decisions must be made by humans
- follow our AI principles which are listed in section 3

If you are unsure about using AI for a specific task, you can:

- ask your manager (for example to make sure that you are using MagicNotes as intended in your directorate)
- contact the Information Governance team at informationgovernance@herefordshire.gov.uk

2.1 Using Microsoft Copilot Chat

Just like an assistant, Copilot Chat assists you with daily tasks, helping you get things done more efficiently. How, and what, you use AI to support your work is up to you – provided you use it safely, ethically, and legally.

For example, Copilot Chat can help you to:

- generate ideas for projects and campaigns
- carry out research and gather information
- condense complex information into easy-to-understand summaries
- draft content for reports, emails and presentations
- generate visuals such as charts, tables and images – make sure you follow the council's brand guidelines

- interpret data and generate insights
- perform common tasks throughout your day to save time and improve your wellbeing – you can find ideas and examples on how to use AI for the workplace online
- upload files like Word docs, Excel files and PDFs to prompt Copilot Chat to analyse and interpret them as part of its response

When you use Copilot Chat at work (on your Herefordshire Council laptop or logged into the M365 website with your Herefordshire account), the information you share is handled with the same level of security and privacy as other Microsoft services you use, like your emails, documents and Teams messages. This includes any files you upload. The information will only be used to answer your prompts. It is not shared with any other parties or used to train AI.

To learn more about Copilot Chat and how to use it visit [Microsoft's guide to learning how to use Copilot Chat](#).

3 Our Herefordshire AI principles

We believe our approach to AI must be both innovative and responsible. We can use AI to address both user needs and broader responsibilities, while safeguarding safety, security and privacy.

All AI tools must be used responsibly to comply with all relevant laws, regulations and council rules. Your use of AI should be in line with the council's equality, diversity and inclusion policy statement, our code of conduct and the Equality Act 2010.

Whenever you use AI at work, you're expected to follow these principles for its safe and fair use.

3.1 Protect confidentiality and sensitive data

UK data protection laws apply when we use personal data. Personal data should never be entered into any system or website that has not been approved by the council.

Confidential and personal information must not be entered into any public AI tools such as ChatGPT. This is because the information will then enter the public domain and may be used for further training of the publicly available tool which would be a data breach.

3.2 Check for content accuracy

AI can sometimes generate incorrect or misleading information. You need to make sure that the information produced by AI is correct and reliable before you use it.

You are responsible for checking facts, figures and content against reputable sources to make sure it is accurate. Use your professional knowledge to look for errors before using anything produced by AI. You should also check that AI has not altered the emphasis or tone that you intended for the document.

3.3 Check for discrimination and bias

Look for any language that might be offensive, discriminatory or inappropriate. This includes checking for stereotypes, inflammatory language or loaded phrases.

AI models can sometimes reflect biases from the data they were trained on. This can lead to unfair treatment of different groups or reinforce stereotypes that are discriminatory.

3.4 Disclose use of content made by AI

Clearly identify and disclose any content made entirely by AI. This lets people know that the information was generated by AI but reviewed by a human.

You do not need to disclose content that was only edited, transcribed or summarised by AI, as long as it was reviewed by a human.

One way to disclose the use of AI is by adding a note or footnote.

Template for footnote

This document contains content generated by artificial intelligence (AI). AI generated content has been reviewed by the author for accuracy and edited or revised where necessary. The author takes responsibility for this content.

3.5 Avoid using copyrighted material

Using copyrighted material without permission can lead to legal issues.

Do not use copyrighted materials or rewrite copyrighted material with AI. While AI can transform and create new works, we need to balance creativity with fair use principles to avoid infringement.

If you are unsure whether a particular use of AI constitutes copyright infringement, you should contact Legal Services at legal@herefordshire.gov.uk.

3.6 Allow for human review and intervention in AI supported decisions

Make sure that any automated decision-support processes allow for human review and intervention (decisions must be made by humans).

You need to know how to interpret decisions that are informed by AI and be able to explain how those decisions were made. Any systems that can lead to decisions supported by AI must have the option for a human to step in and review or change decisions if necessary.

3.7 Get permission before using new AI tools

If you want to use a new AI tool, you need to get approval. You will need to explain what tool you want to use and why (see paragraph 7).

You can get permission to use a new AI tool by contacting the Information Governance team (informationgovernance@herefordshire.gov.uk) in the first instance.

3.8 Report breaches

We understand that mistakes can happen.

If you or someone else does something against this policy, it's important to report it immediately to help reduce the risk of harm. You can this by emailing the Information Governance team at informationgovernance@herefordshire.gov.uk.

4 What you need to do if you manage or check AI tools

This information is for those with professional duties related to managing and checking that AI tools comply with regulations and organisational rules.

If you are helping to implement AI tools or monitor AI use, you must:

4.1 Check whether contractors are using AI

Any use of AI technology by contractors when using council data must comply with the council's policies, practices and terms and conditions of any contract.

4.2 Check AI tools are compliant with data protection regulations

Herefordshire Council is the data controller of any material created by AI. However, the data may be subject to laws where the tool is hosted.

AI service providers should be assessed for their assurances regarding data ownership and international transfers by any organisation wishing to use their AI.

Do not use AI tools that store data in places without an adequacy decision, which ensures data protection standards. If you are unsure if a country has an adequacy decision, contact the Information Governance team for advice at informationgovernance@herefordshire.gov.uk.

Any inputs and outputs may also be used to train the AI. At this point, we no longer decide how that data is used and it becomes almost impossible to erase. This would breach UK GDPR principles.

4.3 Test integration with other tools

APIs (Application Programming Interfaces) and plugin tools allow you to connect to AI systems and add extra features to other services. These tools help automate tasks and boost productivity by making it easier to use AI in various applications.

Thoroughly test APIs and plugin tools. This means checking that:

- the information they provide is accurate and reliable
- they can handle inappropriate or harmful inputs correctly

5 Using personal data with AI

UK data protection laws apply when we use personal data in AI systems. By personal data, we mean any information that can identify an individual, either directly or indirectly.

Processing personal data means doing anything with any information that could identify an individual person. This can include:

- arranging the data in a structured way to make it easier to use
- finding and accessing the data when you need it
- giving the data to others
- looking at the data to understand or use it
- writing down or saving the data in a system

Basically, it's any action you take with personal information, from gathering it to getting rid of it.

5.1 Fair and lawful use

Processing personal data must be "fair" under UK law.

Our Artificial Intelligence (AI) [Privacy Information notice](#) explains that we are using AI Tools to help us perform tasks in the public interest set out by law.

When considering using personal data in council-approved AI tools such as Copilot, we need to:

- handle personal data in ways that people would reasonably expect – for example, if someone provides their email address for a newsletter, use it only for that purpose unless they agree to other uses
- be transparent about how we use personal information in AI systems and tools – it is important that we tell people about the use of AI when we process their data
- avoid using data in ways that could harm or disadvantage people without a valid reason

Specific uses for AI may be covered in our privacy notices. If not, we need to make sure that we update them to reflect any new processes or technology we are using.

If there are any doubts about the appropriateness of using AI in a particular situation, talk to your manager or contact the Information Governance team at informationgovernance@herefordshire.gov.uk.

6 What happens if you don't follow this policy

We understand that mistakes can happen. You or someone else might do something and later realise it is against this policy. If this happens, talk to your manager immediately and explain what has happened.

Any breaches of this policy must be reported to the Information Governance team at informationgovernance@herefordshire.gov.uk who will be able to investigate the issue. Provide a clear and honest explanation of what happened.

By taking these steps, you can help protect the council from future risks and make sure that breaches are handled in the right way.

Violations of this policy must be reported to your line manager. Failure to comply with this policy may result in disciplinary action, in accordance with council's policies and procedures.

6.1 Impact on the council

Not following this policy can:

- cause harm to residents
- create data breaches that expose confidential information
- damage our reputation
- interrupt the normal functioning of the council
- lead to fines and significant financial costs
- make our systems and tools vulnerable to attacks and exploitation

6.2 Impact on you

Not following this policy can also have a negative impact on you because:

- if you don't follow the policy, it can be seen as breaking the council's code of conduct
- in more serious situations, this could result in disciplinary action as part of the disciplinary policy

If you have any questions or need further guidance about this policy or using AI, speak to your manager or contact the Information Governance team at informationgovernance@herefordshire.gov.uk.

7 Getting permission to use a new AI tool

If you have a business problem and are considering using a new AI tool, come to us and we will help you find the right solution.

We need to make sure that any new technology is safe and appropriate for use at work. Tell us about what you are trying to achieve by contacting the Information Governance team (informationgovernance@herefordshire.gov.uk) in the first instance.

You will need to make sure funding is in place to meet the full costs of implementing and supporting the new AI tool, which may include additional costs for Hoople.

If your request is agreed, you will also need to complete a data protection impact assessment and then follow relevant standard procurement practices for any project or process where use of AI is proposed. The assessment will consider potential impacts including legal compliance, the fairness of using personal information, security (including technical protections and security certifications).

You will need to be able to answer:

- the name of tool or system you intend to use
- the reason for needing a new tool
- the type of information you expect to input into the system
- the type of output or content you will be producing
- what steps and human checks are in place to make sure that the AI output is suitable, accurate and trustworthy
- who will receive the content, such as employees or members of the public

8 The environmental impact of using AI

It's difficult to quantify the environmental impact and resource used for AI in general terms as both vary depending on a wide range of factors. For example, using AI to generate images is significantly more resource intensive than a more traditional 'search' style AI prompt. AI is a fast-evolving technology, and AI is being used to improve the efficiency of AI. As the sector evolves the heat produced by AI data centres is being reused to heat homes for example.

AI and the environment are both divisive topics and people can hold strong views on both. There is no single 'right' answer. The Environment team are starting to investigate how AI can help us to achieve our sustainability goals, and as we learn more we will share that learning so that we can all make the best and most efficient use of AI and the productivity benefits that it delivers.

We all need to be conscious in our use of AI, considering for example the environmental and ethical impacts of our use, especially when using more resource intensive features such as image generation.

AI is evolving all the time. We will review and update this policy more regularly. There are many training opportunities to support your use of AI, and to ensure you're using AI safely.