



## Langstane Housing Association

### Generative artificial intelligence (AI) policy

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Langstane Housing Association Ltd is a registered Scottish Charity No. SC 011754 and a registered Property Factor No. PF 000666



Version		1
<b>Version</b>	<b>Date Approved</b>	<b>Changes</b>
Version 1	16-04-2026	First issue

## 1. Purpose

This policy sets out how Generative Artificial Intelligence (AI) may be used within Langstane Housing Association (“Langstane”).

Its aims are to ensure:

- responsible, ethical, and secure use of AI
- compliance with UK GDPR and Langstane’s data protection policy
- protection of tenant information and organisational reputation
- clarity around permitted and prohibited uses
- safe, purposeful adoption of AI to enhance employee productivity

Langstane encourages the responsible and thoughtful use of AI tools to support employees, while ensuring the human element remains central to all decisions.

## 2. Scope

This policy applies to:

- Employees
- Managers
- Board members
- Temporary workers, and consultants
- Any person using AI tools to support Langstane business activities

It covers AI usage across all workplaces, including office locations, homes, mobile devices, and hybrid working arrangements.

## 3. What do we mean by Generative AI?

Generative AI refers to tools capable of producing new content (text, images, code, summaries, analysis, etc.) based on user input. Examples include ChatGPT, Google Gemini, and Microsoft Copilot.

These tools can increase efficiency and creativity, but they may also generate incorrect, biased, or misleading output and can pose data-security risks if misused. All AI-generated output must therefore be reviewed by a human before being relied upon.

## 4. Position statement

Langstane adopts a balanced, cautious, and pragmatic approach to AI:

- We recognise AI can improve productivity and support employees with drafting, summarising, and analysis.
- We will explore tenant-facing AI responsibly in future, following formal governance and risk assessment.

- We do not deploy autonomous, decision-making AI systems.
- All AI use must protect personal data and follow Langstane's data protection policy.
- AI is a support tool, not a substitute for professional judgement or human decision-making.

## 5. AI tools – Tiered usage model

The Association permits AI usage through a three-tier model.

### Tier 1 – Approved internal tools (Full use allowed)

These are systems operated within the Associations secure Microsoft 365 environment or provided by vetted vendors:

- Microsoft 365
- Any future enterprise AI services explicitly procured by the Association
- Vendor systems that incorporate AI (e.g., HomeMaster, Canva, Adobe) providing the output is reviewed through appropriate channels, for example details and graphics created in Canva must be appropriate

### Tier 2 – Public AI tools (Limited use allowed)

The following public tools may be used only for non-confidential, non-tenant, non-internal information:

- ChatGPT
- Google Gemini
- Microsoft Copilot

Permitted only for:

- generic drafting
- rewriting or improving employee-generated text
- summarising non-confidential content
- ideation, planning, problem-solving
- help with formulas, templates, and generic coding

Strictly prohibited:

- entering *any* personal data
- uploading internal documents, emails, spreadsheets, reports, or tenant case information
- describing confidential situations or scenarios that could identify a real person or the Association (for example, a question could be posed about a registered social landlord based in Scotland, but not Langstane)

### Tier 3 – Prohibited tools

The following must **not** be used for Langstane work:

- AI tools requiring upload of documents to unknown servers
- Browser extensions or plugins that scrape on-screen content
- Unverified or unapproved AI applications
- Any AI tool that stores prompts publicly or trains models using our inputs
- AI tools not covered in Tier 1 or Tier 2

## 6. Acceptable use

Employees may use approved AI tools for:

- Drafting simple internal communications and emails
- Creating drafts of non-sensitive documents
- Summarising long text that does not contain personal data
- Generating ideas, outlines, or suggestions
- Supporting data analysis with non-confidential data
- Preparing planning materials, reports, or internal notes
- Creating templates or code snippets that do not involve real tenant or employee data

All AI-generated content must be:

- Reviewed and checked for accuracy
- Edited to ensure clarity, fairness, and plain language
- Assessed for bias, ambiguity, or misleading content
- Consistent with the Associations tone, values, and policies

## 7. Prohibited Use

7.1. Generative AI **must not** be used for personal data. Entering, describing, summarising or analysing any **personal data**, including but not limited to:

- Names
- Addresses
- Phone numbers
- Email addresses
- Rent figures or arrears information
- Repairs, complaints, or case information
- Income, support needs, or vulnerability data
- Employee HR information
- Any internal documents, emails, or spreadsheets

This applies especially to public tools described in Tier 2.

7.2. In relation to tenant facing content and communications, AI must not generate:

- legal notices
- rent arrears letters

- complaint responses
- ASB communications
- safeguarding-related content
- any message that could materially affect a tenant's rights, obligations, or perception of Langstane

AI may assist drafting, but a human must edit, verify, and approve all tenant-facing content.

### 7.3 Decision making

AI must not be used to:

- make decisions about tenants or applicants
- assess eligibility
- determine support needs
- influence HR or disciplinary decisions

### 7.4 Impersonation or misrepresentation

AI must not be used to:

- impersonate employees, tenants, or contractors
- create misleading, vague, or robotic communications
- generate false meeting notes or summaries

**7.5** Circumventing legal, policy, or contractual obligations including GDPR, procurement rules, safeguarding duties, or regulatory expectations.

## 8 Data protection and security

- All AI use must comply with the Associations data protection policy and UK GDPR.
- No personal data may be entered into any public AI tool.
- Any such incident will be treated as a reportable data breach.
- Employees must follow the data breach reporting procedure immediately if accidental disclosure occurs.
- AI outputs must be stored, handled, and shared according to the Associations existing policies for documents and records.

## 9 Transparency

Internally, employees should be open about whether AI assisted in drafting content. We do not require disclosure to tenants or external parties.

However, all AI-assisted content must be fully reviewed and edited by employees before issue.

## 10 Intellectual property

Content generated for business purposes is owned by the Association. Users must not generate or use copyrighted or licensed material in breach of intellectual property rights. Employees are responsible for ensuring AI-generated content can be used legally.

## 11 Training and awareness

Before using AI tools for work purposes, employees must complete:

- mandatory internal AI awareness training
- refresher training as required
- any specialised training related to approved AI systems

This training will cover risks, accuracy checking, data protection, bias, and safe prompt practices.

## 12 Proposing new AI use cases

The Association recognises the benefits adopting AI can bring and in the future the tools and systems we rely on will include ever evolving use of AI. The adoption of any AI tools and systems must be assessed and suitable control and audit abilities determined.

The use and scope of AI will be considered as part of the scoping process, business case and implementation of all new or replacement systems and tools.

Each proposal must outline:

- purpose and expected benefits
- data required
- risks and mitigations
- governance and transparency
- system vendor and technical details
- potential tenant impact
- required integration or automation
- alignment with policy
- data protection compliance
- risk management
- ethical considerations
- technical due diligence

Specific approval must be granted before implementation of any AI related tools or systems. As the policy owner the IT Manager would oversee the business case creation and risk assessment of any AI tools. Approval of the adoption of AI tools forms part of wider controls and project management approach for digital projects, which requires approval from the leadership team.

### **13 Reporting, misuse and enforcement**

Any suspected misuse, breach, or accidental disclosure of personal data via AI must be reported immediately to:

- Digital / IT team
- Data protection officer
- Line manager

Misuse of AI tools may result in corrective action under HR policies, up to and including disciplinary action.

### **14 Review of this policy**

This policy will be reviewed:

- annually,
- or sooner if required by legal, regulatory, or operational changes,
- or if significant new AI capabilities or risks emerge.