

# Artificial Intelligence (AI) policy – version 1

Date approved for use: 22<sup>nd</sup> July 2025

## Scope

- 1.1 This policy is a Dimensions Group policy. This means it applies to all its subsidiaries as listed in **Dimensions Group company information**.
- 1.2 This policy sets out principles, governance structures, and operational guidelines for the adoption, deployment, and monitoring of Artificial Intelligence (AI) across the organisation.
- 1.3 This policy applies to all colleagues, volunteers, board members, contractors, and any third-party providers engaged in AI development or deployment within the organisation.
- 1.4 You can find the documents, forms and other policies mentioned in this policy on the Hub (Dimensions intranet).
- 1.5 To go straight to the policy content click on the hyperlink section title below or go to the page:

### Section

<a href="#"><u>AI Ethics Statement</u></a>	<b>Page 3</b>
<a href="#"><u>Governance and oversight</u></a>	<b>Page 4</b>
<a href="#"><u>AI and data security</u></a>	<b>Page 5</b>
<a href="#"><u>AI in service delivery</u></a>	<b>Page 5</b>
<a href="#"><u>Acceptable and non-acceptable uses of AI</u></a>	<b>Page 6</b>
<a href="#"><u>Ethical considerations and human oversight</u></a>	<b>Page 7</b>
<a href="#"><u>AI training and awareness</u></a>	<b>Page 7</b>
<a href="#"><u>Third-party AI providers</u></a>	<b>Page 8</b>
<a href="#"><u>AI incident reporting and accountability</u></a>	<b>Page 8</b>
<a href="#"><u>Compliance and review</u></a>	<b>Page 8</b>

## Policy statement

- 2.1 Dimensions (UK) Limited is committed to the ethical and responsible use of Artificial Intelligence (AI) in delivering and improving services to individuals with learning disabilities and autistic people in the most efficient way. AI has the potential to enhance support, streamline operations, and improve outcomes, but must be implemented transparently and in accordance with ethical standards and legal requirements.
- 2.2 The policy covers multiple ways that AI is applied:
- Applications that use AI explicitly as part of their value to the organisation, where Dimensions make a conscious decision to use an AI equipped solution to process data. Tools will include but not be limited to:
    - automated decision-making tools based on information supplied, for example, applicant shortlisting tools that assess CVs for keywords
    - machine learning models that incrementally improve processes based on information being supplied over time, adjusting outputs and learning from what works; examples might include a rostering process that becomes more efficient the more it 'learns' our normal working patterns, or Chatbots that improve responses based on feedback
    - natural language processing tools that process text supplied to provide answers to questions, or adjust text to meet a defined purpose, such as, ChatGPT, CoPilot
    - assistive technologies that can support people with learning disabilities and autism, for instance tools that can assist in communication for people who do not use words
    - further uses of AI applications that we have not considered yet but may in the future.
  - Any applications we procure that use AI but are not explicit in AI use should still be assessed against our AI Ethics position; these may include existing Cloud solutions that are updated to include AI, such as Microsoft 365 applications and Oracle.
  - Enhanced search and analysis tools, the replacement of traditional search engines are becoming normal use across larger search engine providers such as Google and Bing.

- Large data set analysis that provide data-driven insights, used to enhance reporting, strategy and decision making.
  - Third party supplier use of AI that may contradict our AI Ethics Statement.
- 2.3 AI presents opportunities to improve efficiency and enhance services but must be implemented responsibly.
- 2.4 This policy ensures that AI aligns with our values, legal obligations, and ethical standards, safeguarding the rights of the individuals we support.

## The impact of not implementing this policy

- 3.1 Dimensions is subject to several regulators one of which, the Information Commissioners Office, holds us to account for how we look after data we control. By not implementing this policy we are at risk, and there may be an impact for you and the organisation from our regulators, which may include:
- the person's local authority (LA)
  - in England, the Care Quality Commission (CQC)
  - in Wales, the Care Inspectorate Wales (CIW)
  - The Charity Commission (CC)
  - Health and Safety Executive (HSE)
  - the Regulator of Social Housing (RSH)
  - the Information Commissioners Office (ICO).

## Policy content

### AI Ethics Statement

- 4.1 Our **Dimensions UK Artificial Intelligence (AI) Ethics Statement** available on the Hub and our public facing website, describes our approach to the application of AI and how we will govern it.
- 4.2 The core principles table below shapes our approach to applying AI safely:

Core principles	What we believe	How we will apply it
Respect for rights and dignity	We respect the dignity, rights, and privacy of all individuals	Use AI that supports our values, not undermine people's dignity or autonomy
Transparency and accountability	Being clear about how we use AI and its impacts	We will keep everyone informed about how AI works, its benefits, and potential risks
Data privacy and security	Protecting personal data is a priority	We will follow Data Protection rules (like UK-GDPR), to keep data secure; use secure AI systems to keep data safe; avoid sharing data with public models unless we choose to
Fairness and non-discrimination	We aim to make AI fair and inclusive	We will test systems to ensure they don't discriminate and will monitor bias in AI results
Doing good and avoiding harm	AI should improve lives and avoid causing harm	We will assess risks and put steps in place to prevent harm; critical decisions will always involve a person reviewing any AI's suggestions
Continuous improvement	We are committed to learning and improving how we use AI	We will seek feedback and adapt AI systems based on our learning and evolving technology

## Governance and oversight

- 5.1 We are expanding the governance responsibilities of the Information Governance (IG) Panel, to include AI ethics. The IG Panel will be responsible for upholding our Ethics Statement. The panel will hold responsibility for approving new or changes to, how we apply AI in the organisation.
- 5.2 AI applications involving the processing of personal, sensitive, or special category data must undergo a **Data Protection Impact Assessment (DPIA)** before procurement and must assess the risk to privacy for individuals and comparison to systems which do not require AI to achieve the same aims.

- 5.3 IT approval for an AI system is complementary but separate to approval of a DPIA. The IT department must approve a proposed system for technical compatibility with existing systems and operating environments, in addition to the data security considerations in a DPIA.
- 5.4 AI use cases will be reviewed annually by the system owner to assess ongoing compliance, effectiveness, and risk mitigation.
- 5.5 New systems that incorporate AI, will be assessed against the Dimensions Enterprise Architecture for fit, before going through a procurement process.

### **AI and data security**

- 6.1 AI systems must adhere to strict data security measures, ensuring encryption, anonymisation, and secure storage of personal data.
- 6.2 No AI system should access or process personal identifiable information (PII) unless necessary and authorised under a legal basis and approved through the DPIA process with DPO sign off.

It is the responsibility of the colleague using the system to not submit PII to AI systems without the necessary DPIA approved by the DPO.

- 6.3 AI models should not store or retain unnecessary data beyond required processing timeframes.
- 6.4 Data used for AI training and improvement should be sourced ethically, with explicit consent where applicable.
- 6.5 Secure environments will be provided for AI development to prevent inadvertent data sharing with public LLMs (Large Language Models).
- 6.6 Only Dimensions UK authorised AI solutions are to be used for work purposes, consuming any Dimensions data, or using Dimensions UK equipment.

There can be risks to data and cyber security from using some AI systems and all systems must be assessed and approved in advance.

### **AI in service delivery**

- 7.1 AI may be used to enhance communication, accessibility, and assistive technologies for individuals with learning disabilities and autistic people.

- 7.2 AI-based recommendations for care planning must be reviewed and validated by human professionals before implementation.
- 7.3 AI-driven communication tools (such as chatbots) must always provide an option for human intervention and support.
- 7.4 AI should not be used to monitor individuals covertly; any monitoring or assistive AI must be explicitly consented to by the individual or their advocate. AI monitoring may include video analysis but could be from any environmental data or other Assistive Technology.

## **Acceptable and non-acceptable uses of AI**

### **8.1 Acceptable Uses – note that these are paid licensed solutions:**

- use of CoPilot through Office 365, which incorporates enterprise security – administered through our Microsoft licences.
- use of AI-powered transcription and note-taking via ‘Teams Premium’ licences for authorised colleagues, typically administrators with responsibilities for setting up meetings
- use of our enterprise-licensed version of ChatGPT for teams, ensuring data is not fed into a public LLM and can be used for confidential but non-personally identifiable data. This license is restricted to specific use cases and individuals
- AI assisted search tools, on commonly used search engines Google and Bing
- other AI solutions explicitly approved by the IG Panel, for instance applications that use AI to solve specific problems. This includes solutions that have come through the Access to Work / Reasonable Adjustments process for colleagues with a disability. Currently this is zero.

### **8.2 Non-Acceptable Uses of AI on Dimensions UK devices or data:**

- use of AI solutions that have not been reviewed and approved by the IG Panel with necessary DPIA process. This is currently every AI solution not explicitly listed above, including ChatGPT public (free) edition, DeepSeek and so on. It will not be practicable to maintain a list of non-approved AI solutions, so only ‘Whitelisted’ applications listed on the Hub are approved for use. The list above in 8.1 shown for convenience, may not reflect all solutions approved, which is held separately on the Hub

- use of personal identifiable data in any AI model, without explicit approval from the DPO and SIRO following DPIA process. For clarity this includes the use of AI to generate daily notes or other records that will be transferred into a Support Record.
- use of unapproved AI applications on work equipment, software, and networks.
- Feeding organisational data into publicly available AI tools without explicit approval.

8.3 Non-compliance with these guidelines constitutes a breach of this policy and may result in disciplinary action, as outlined in the **Disciplinary policy**.

8.4 Legitimate uses of AI will be considered by the IG Panel and may be fast tracked if necessary.

### **Ethical considerations and human oversight**

9.1 AI should be used to augment human decision-making rather than replace it.

9.2 Bias mitigation strategies must be in place to prevent discrimination in AI-driven decision-making; this may not be within Dimensions UK's control but should be considered in assessment of proposals when any decision-making capability is present. This is in addition to any actions and processes from the **Equality, diversity and inclusion policy** which will be applied as normal.

9.3 Individuals affected by AI decisions must have the right to challenge and appeal decisions through a transparent process

9.4 AI solutions should be tested for unintended consequences before deployment.

### **AI training and awareness**

10.1 Colleagues working with AI systems must undergo initial training on AI ethics, risks, and best practices including how to use safely.

10.2 AI awareness will be included in Data Protection training as part of colleague induction and annual refreshers.

10.3 Training materials will be made accessible to all colleagues, ensuring that AI literacy is promoted across the organisation.

### Third-party AI providers

- 11.1 Any external AI service provider must comply with this policy, data protection laws, and ethical guidelines.
- 11.2 Contracts with AI providers must include clauses on data security, transparency, and ethical AI practices.
- 11.3 Any third-party AI used for decision-making must undergo regular audits and assessments for fairness and accuracy.

### AI incident reporting and accountability

- 12.1 Any AI-related incidents, including errors, hallucinations, biases, or potential risks, should be logged with the IT Service desk. Any incidents that put data at risk must be reported using the Radar incident management system immediately, enabling assessment by the Data Security team. All incidents should be collated and reported to the IG Panel.
- 12.2 The IG Panel will investigate or delegate investigations on AI-related incidents and recommend corrective actions.
- 12.3 Individuals impacted by AI decisions must have clear channels for raising concerns to request human review of a decision. See the **Concerns, complaints and compliments policy** for information.

### Compliance and review

- 13.1 Compliance with this policy will be monitored through periodic internal audits.
- 13.2 This policy will be reviewed annually, incorporating feedback from all stakeholders, colleagues, and industry best practices.
- 13.3 Updates to this policy will be communicated to all relevant stakeholders in a timely manner.

## Relevant legislation, guidance and related policies and templates

This policy and related procedures consider the following legal requirements and regulatory codes, standards, and guidance:



## Legislation

- 10.1 Data Protection Act 2018
- 10.2 General Data Protection Regulations (UK-GDPR)
- 10.3 Equality Act 2010
- 10.4 Computer Misuse Act 1990

## Guidance

- 11.1 DPIA form (including section on AI changes and process to follow)

## Group policies

- 12.1 Equality, diversity and inclusion
- 12.2 Acceptable use of technology
- 12.6 Data handling and protection
- 12.7 Social network and media
- 12.8 Assistive technology that keeps people safe

## Related procedures, decision flowcharts, forms

- 13.1 Dimensions UK Artificial Intelligence (AI) Ethics Statement

## Equality statement

- 14.1 Dimensions is committed to adhering to the Equality Act 2010 and the Public Sector Equality Duty. We aim to achieve this by promoting equality, respecting diversity and ensuring inclusion, eliminating unlawful discrimination for our colleagues and the people we support. Please see our **Equality, diversity and inclusion policy**.
- 14.2 We adhere to the Equality Act 2010 by promoting equality, diversity, and human rights by treating all people we support and employ fairly and equitably whatever their protected characteristic:
  - age
  - disability
  - gender reassignment
  - marriage and civil partnership
  - pregnancy and maternity
  - race

- religion or belief
- sex
- sexual orientation

14.3 At Dimensions we will not tolerate any forms of abuse or discriminatory behaviour towards our colleagues, people we support, family members or people we work with. We will always act and will not be by-standers.

14.4 The equality impact analysis (EIA) is available on request by emailing the Head of Equality, Diversity and Inclusion.

## Data protection statement

15.1 This policy involves handling personal data. So, when you carry out any procedures this policy describes, you should also think about what our **Data handling and protection policy** says.

15.2 Our **Data handling and protection policy** is our promise to handle personal data correctly under the Data Protection Act 2018 and the General Data Protection Regulation (UK-GDPR). It tells you how to keep that promise. It balances everyone's rights to data privacy with the work we do.

15.3 For information on how we handle personal and sensitive data, please see our privacy notices.

## Review

16.1 We will review this policy annually. But if changes in legislation, regulation or best practice mean we need to, we will review sooner.

16.2 If the changes are big, we will equality impact analyse (EIA) the policy again and send out to consultation in line with our **Policy development and consultation policy**.

16.3 For smaller changes, we will update this same version. We will record this in the Version control section below.

## Glossary

17.1 An explanation of words and terms that appear in this policy or the related procedures.

Term	Definition
<b>Artificial Intelligence (AI)</b>	A coverall term that refers to the various solutions available where technology simulates human intelligence, enabling them to perform tasks like learning, reasoning, pseudo-creativity, problem solving, perception (often of images) and understanding language
<b>Enterprise Architecture (EA)</b>	The Dimensions Enterprise Architecture or EA outlines our intention for systems, infrastructure and data over a 10-year period

## People and groups involved in writing and approving this policy

<b>Policy owner:</b>	Simon Etheridge, IT Operations Director
<b>Policy Responsible Executive Lead:</b>	Ben Sutton, Group Chief Digital and Information Officer
<b>Approval level:</b>	Group Executive Team
<b>People and groups consulted:</b>	Diversity Matters National Colleague Forum Policy Subgroup

## Version control

<b>Version number</b>	<b>Approved date:</b>	<b>Communication date:</b>	<b>Summary of changes</b>
I	4 <sup>th</sup> June 2025	22 <sup>nd</sup> July 2025	New policy.

**Next review due: July 2026**