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Artificial Intelligence (AI) Management Policy

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1 WHY WE NEED THIS POLICY

- 1.1 Artificial Intelligence (AI) is becoming an increasingly common part of how organisations deliver services and make decisions. At Thirteen, we want to encourage the use of AI and maximise the benefits it can bring for our customers, colleagues, and services.
- 1.2 Used well, AI can improve efficiency, enhance customer experience, and support better-informed decisions. However, as a social housing provider, we also recognise our responsibility to use AI in a way that is safe, fair, and transparent. Any use of AI must strengthen trust, protect customer and colleague rights, and support fair, high-quality services. People remain in control of key decisions, and AI should support not replace human judgement.
- 1.3 AI introduces risks that are different from traditional technologies. Potential harms can occur at scale, affecting many people quickly if not properly governed. Without clear guardrails, AI can unintentionally create unfair outcomes, embed bias, reduce transparency, or undermine confidence in our services.
- 1.4 This policy sets out clear expectations and safeguards for how AI is introduced, used, and monitored across Thirteen. It provides a consistent framework for colleagues, customers, partners, and suppliers, ensuring AI is used only where it adds value, remains accountable, and is aligned with our values and legal obligations.

2 TRANSPARENCY ARRANGEMENTS

- 2.1 Transparency and accountability for this policy is overseen by an AI Ethics Steering Group, which will provide independent scrutiny, customer representation, and assurance that all AI activity aligns with our ethical standards and organisational values.
- 2.2 The AI Ethics Steering Group will report up to the Data Governance Board which will in turn report to the Leadership Team and ultimately Audit & Risk Committee

3 HOW WE MEASURE THE EXPECTATIONS AND OUTCOMES

3.1 Our approach to measuring the impact will be simple and proportionate, with the intention to strengthen and expand it over time.

3.2 We will begin by carrying out basic checks to ensure that any new AI tool is recorded in our AI Register, has undergone an impact assessment which builds on our existing Data Privacy Impact Assessment (DPIA), and aligns with the principles set out in this policy. Monitoring through the AI Ethics Steering Group will focus on identifying any obvious issues, ensuring AI does not create unfair outcomes, and supporting colleagues to use AI responsibly.

3.3 Customer & Colleague experience is an important indicator at this stage. We will gather feedback, listen to concerns or questions, and use insights from involved customers & colleagues to understand how AI is perceived and whether it supports trust and confidence.

3.4 Oversight will be provided by the AI Ethics Steering Group which will have its own terms of reference focusing on:

- Current applications of AI at Thirteen, including an overview of AI systems in use and their purposes
- Assessment and consideration of any proposed new uses of AI, ensuring alignment with organisational values and policy principles
- Establishing and maintaining a formal process for raising, reviewing, and resolving ethical concerns or general issues related to AI
- Evaluating the impact of AI tools on customer and colleague experience, including feedback and perceptions
- Ensuring all AI tools are properly recorded in the AI Register and have undergone appropriate impact assessments
- Providing independent scrutiny that all AI activities comply with ethical standards and legal obligations
- Regularly update the policy to uphold ethical AI use and maintain alignment with Thirteen's values.

3.5 This policy and its outcomes will be reviewed annually to ensure the arrangements remain proportionate and to identify where more detailed monitoring or governance may be needed as our AI maturity increases.

4 CONDUCTING ARTIFICIAL INTELLIGENCE AT THIRTEEN

Scope

4.1 This policy applies to all Thirteen Group employees (including temporary colleagues) & all other third parties or partner organisations using or sharing the organisations information.

4.2 All AI systems and tools fall within the scope of this policy. These include, but are not limited to:

- Machine learning algorithms
- Generative AI, for example Microsoft Copilot / ChatGPT
- Natural Language Processing (NLP)
- Robotic Process Automation (RPA)
- Predictive analytics tools
- Other similar tools.

Adherence with this policy is mandatory and the approval mechanisms, outlined at section 8 What do I do if I want to use an AI software or system, must be followed prior to the use of any AI tools.

5 What is AI

5.1 AI refers to computer systems and software that perform tasks that usually require human thinking. This includes things like understanding language, recognising images, reasoning, prediction and making decisions. AI can help humans solve problems and perform tasks.

Common AI functionalities include:

- **Large Language Models (LLM):** an AI model trained on vast amounts of text data such as books, articles and websites to understand, generate and manipulate human language.
- **Machine Learning (ML):** systems that learn and improve autonomously from data like predictive analytics
- **Generative AI:** tools that create text, images, code, or media content based on input.
- **Natural Language Processing (NLP):** systems that analyse, generate, or interact using human language.

- **Robotic Process automation:** technologies that perform repetitive tasks without human intervention.

These AI tools can work by themselves or can be added to other software platforms. They can help improve operations, automate tasks, and provide helpful insights.

6 Policy Principles

6.1 Thirteen is committed to deploying AI ethically, securely, and transparently, guided by five key principles and underpinned by the concept of the ‘right to roam’ in AI. This means we not only adhere to our core principles of fairness, transparency, human oversight, safety, and purposeful use, but also ensure individuals have the freedom to understand, access, and question AI-driven processes that may impact them.

1. Fair and Equal

AI systems must be designed and implemented by humans in ways that treat everyone fairly, actively avoiding the creation or reinforcement of bias or discrimination.

2. Open and Transparent

People should always know when AI is being used and how it affects decisions or services.

3. Human Led

AI supports decisions - it does not replace human judgement. When decisions that affect people are being made, a human is always available to review or override an AI supported outcome.

4. Safe and Secure

AI must be reliable, tested, and used in ways that protect colleagues & customers privacy and keep their data safe.

5. Purposeful and Proportionate

AI will only be used where it adds real value, improves services, or benefits residents — never simply because the technology exists.

7 Risks

7.1 Thirteen Group recognises that the use of AI presents a range of potential risks.

These include:

- **Bias and Discrimination:** AI systems can inadvertently reinforce existing prejudices or inequalities if not carefully designed and monitored.
- **Lack of Transparency:** Complex algorithms may make it difficult to understand or explain how decisions are reached, leading to reduced accountability.
- **Over-reliance on Technology:** Relying too heavily on AI may undermine human judgement and reduce oversight, potentially leading to errors or unintended consequences.
- **Privacy and Data Security:** AI systems often require large amounts of data, which raises concerns about protecting personal information and preventing misuse.
- **Misuse and Unintended Consequences:** AI could be used for harmful purposes or behave unpredictably if not properly controlled and regulated.
- **Hallucinations:** Generative AI may sometimes produce inaccurate content or advice.
- **Mental Health:** Perceived or actual AI-enabled monitoring may lead to increased colleague anxiety, reduced trust, and negative impacts on wellbeing and engagement.

7.2 Where risk has been identified we ensure that we manage those risks using our core principles along with technical controls mentioned throughout this policy. We will continuously monitor and review the risks and controls in place

8 What do I do if I want to use an AI software or system?

8.1 Even though Thirteen has comprehensive safeguards set out in our IT Service Management Framework and the acceptable use policy, you must not build or download or use any AI software or system outside of our preapproved software until you have completed the proper approval procedure (Supporting Documentation 2).

8.2 Prior approval must be sought from the IT department before implementing any AI system, particularly where the technology will process personally identifiable data. In such cases, A Data Privacy & AI Impact Assessment must be completed, to ensure all data protection and ethical considerations are properly addressed.

8.3 The ultimate decision will be shaped by our AI Ethics Steering Group, alongside the Director of IT and the Chief Information & Transformation Officer.

9 Pre-Approved Use of AI at Thirteen

9.1 There are some cases where AI systems or software are already in place at Thirteen such as:

- The use of Robotic Process Automation (**RPA**) when verifying Universal Credit Claims for our customers.
- The use of Machine Learning & Data Science when using Voicescape to assist with debt management and tenancy sustainment.
- The use of generative AI and Large Language models (**LLM**) with Microsoft Co-Pilot.
- The use of Natural Language Processing (**NLP**) in Role Mapper to help Thirteens role profiles to be more inclusive & consistent.
- Machine Learning, Data Science & Natural Language Processing (**NLP**) in XDroid (Avoira) to assist the Customer Touchpoint team manage performance management, quality management and understand customer voice.

9.2 A central register of authorised AI software and systems will be kept and maintained by Thirteens IT Department to keep track of approved AI tools and their use cases within the organisation. A link will be available to view the register on our internal system as part of being Open & Transparent as part of our guiding principles and feedback from colleagues.

9.3 The register will capture:

- **Name:** the name of the AI tool.
- **Provider:** the name of the organisation that provides the software/ system.
- **Function:** a brief description of what the tool does.
- **Approval date:** the date the tool was approved by IT.
- **Use case:** specific applications or scenarios where the tool can be utilised.

- **Compliance:** information on compliance and ethical considerations e.g. DPIA etc.

9.4 If your desired AI system or software is approved and listed, request access by submitting a ticket through The Front Door.

9.5 We encourage AI for tasks that enhance productivity, insight, and service delivery, such as:

- Generating draft reports, presentations, and correspondence.
- Summarising large datasets, trends, and documents for research or analysis.
- Improving customer support through analysing our customer contact calls, sentiment analysis, trends & natural language processing.
- Automating repetitive, manual tasks to improve operational efficiency.
- Supporting decision-making through predictive analytics and performance insights.

10 Generative AI

10.1 The only authorised Generative AI platform at Thirteen is Microsoft Co-Pilot; no other platforms are permitted when using Thirteens data or working on Thirteens hardware. Specific guidelines and requirements set out in section 10.2 apply to the use of Generative AI systems, and all such usage will be monitored.

10.2 Generative AI must not be used to:

- Generate or access harmful or inappropriate content or services
 - Produce outputs in contravention to Thirteen's E,D&I, and bullying and harassment procedures.
 - Unfairly discriminate against individuals through bias in prompts, models, or outputs. All inputs and outputs should be reviewed and considered for bias and discrimination
 - Infringe or violate intellectual property, copyright, or other legal protections that exist.
- Any use of protected materials must be carried out with the advance permission of the copyright owner or, in cases where the copyright owner is under 18, their parent or guardian's permission

11 Generative AI output

11.1 The output of Generative AI systems **must** be reviewed and understood by our people prior to use to ensure it is in line with Thirteen's policies and values.

11.2 It is important to recognise that all outputs generated by AI can contain inaccuracies or errors; therefore, thorough checking and verification are essential before any content is adopted or shared. No AI-generated material should be relied upon without scrutiny and validation by the user.

11.3 Generated emails and other communication methods must be accurate, fair, and use the same tone as other communication requirements when representing Thirteen.

11.4 Any generated scripts, code, documents, or processes must be read, understood, and validated for appropriateness prior to use in any production service, system, or location.

12 Unauthorised use of AI at Thirteen

12.1 Unauthorised use of AI, whether deliberate or inadvertent, should be reported as soon as discovered to the IT department.

12.2 Colleagues must not engage in unauthorised use of AI technology, this includes any illegal, unethical, or harmful activities such as generating misleading information, promoting violence, or infringing on intellectual property rights.

12.3 Deliberate breaches of this policy will be reported to the Director of IT & Chief Information & Transformation Officer and may result in disciplinary action.

12.4 Thirteen will not permit the use of personal customer data with AI tools or systems which input data to develop or train a public model (Like ChatGPT). A public model is an AI system or algorithm that is made available for Thirteen colleagues to use, access, or build upon.

12.5 Furthermore, in instances where Thirteen has onboarded an AI solution, such as Role Mapper, the organisation has explicitly opted out of allowing its data to be used for training large language models (LLMs) or any similar AI systems. This ensures that Thirteen's data remains private and is not utilised to enhance or inform public or third-party AI models.

13 Reporting

13.1 Concerns with the use of generated content, and instances of misuse with regards to AI systems should be reported to the Cyber and Data Compliance Team.

14 Roles & Responsibilities

14.1 We have established clear accountability for AI oversight within Thirteen to ensure everyone understands their part in ensuring ethical, responsible, and compliant AI practices are delivered.

- **Director of IT & Chief Information & Transformation Officer:** Ensures AI is used in ways that align with the Thirteens values, goals and legal obligations.
- **Director of IT, CITO & AI Ethics Steering Group:** approves and/or refuses the use of AI and, where appropriate, challenges its use and monitor compliance.
- **Cyber & Information Security Team:** Oversees compliance with the Data Protection regulations whilst providing guidance on use. Supports with the completion of Data Privacy & AI Impact Assessments and monitors and responds to data privacy concerns relating to AI deployment.
- **Cyber & Information Security, Application Development & Support Teams:** Ensures system compliance with security standards and provides technical system support and guidance for AI operations.
- **Procurement Team:** Ensures that suppliers are procured against Thirteens Procurement code of practice, ensuring all relevant stakeholders are involved at the correct stages of new supplier onboarding when
- **Legal Team:** provides advice in relation to intellectual property rights and all other legal matters such as EU AI Act, UK AI Whitepaper.
- **All colleagues at Thirteen:** maintain awareness of AI usage policies, adhere to ethical guidelines, and report any issues, misuse, or security concerns promptly

SUPPORTING DOCUMENTATION ASSOCIATED WITH THIS POLICY

Contents of supporting documentation	
1	Policies/Documents Related to this Policy
2	AI approval process flow

1. Policies and Documents related to this policy

IT Acceptable use policy
IT Service Management (ITSM) Framework
Information Governance Framework
Data and AI Strategy
Data protection Impact assessments

2. AI Approval Process Flow

AI approval at Thirteen will follow the established governance process shown below, ensuring colleagues seek approval and review in a consistent and appropriate way.



