

SAXON WEALD
ARTIFICIAL INTELLIGENCE POLICY

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1.0 Introduction

- 1.1 This policy outlines the principles, guidelines, and procedures for the development, deployment, and use of Artificial Intelligence (AI) systems within Saxon Weald. Its aim is to ensure AI technologies are used responsibly, ethically, and in a manner that aligns with Saxon Weald's core values and legal obligations.
- 1.2 The objectives of this policy are to:
- Comprehend all risks and benefits associated with AI implementation.
 - Establish safeguards to mitigate risks.
 - Leverage AI for the benefit of Saxon Weald and its clients while safeguarding confidentiality, systems, and fundamental rights.
- 1.3 This policy applies to all employees, contractors, partners, and third-party vendors involved in the development, deployment, or use of AI systems within Saxon Weald. It encompasses all AI technologies, including but not limited to machine learning, natural language processing, computer vision, and robotics. .

2.0 Definition and scope

- 2.1 Artificial Intelligence (AI) refers to the capability of a machine to imitate intelligent human behaviour. For the purposes of this policy, AI is defined as "a machine-based system that, given a set of human-defined objectives, makes predictions, recommendations, or decisions influencing real or virtual environments."
- 2.2 Examples of AI relevance to Saxon Weald include:
- Supporting creativity and generating ideas.
 - Analysing customer feedback to improve tenant satisfaction.
 - Predicting optimal asset lifetimes and investment planning.
 - Enhancing cybersecurity operations.
- 2.3 This policy aligns with Saxon Weald's corporate value of being "forward-thinking" by embracing innovation and adapting to new challenges.

3.0 Legal and regulatory requirements

- 3.1 Legal requirements
- EU Artificial Intelligence Act 2024
 - Data Protection Act 2018
 - Regulation (EU) 2016/679 (GDPR)
 - Computer Misuse Act 1990
 - Human Rights Act 1998

- Data (Use and Access) act 2025

3.2 Regulatory requirements

Saxon Weald will ensure compliance with relevant AI and data protection regulations, including those addressing transparency, accountability, and privacy.

4.0 **Policy**

4.1 Saxon Weald Staff are permitted to use approved AI technologies to perform the following actions:

- Generating ideas or content
- Analysing or summarising anonymous* customer feedback to support ongoing service improvement
- Analysing property, repair, hazard, servicing and compliance data to support ongoing service improvement and optimisation
- Taking or transcribing meeting minutes
- Analysing inbound customer contacts to BrikHousing to support improved assignment to the correct resolver team

*Anonymous customer feedback means that it should not be possible to identify the customer, either directly (from the data itself) or indirectly (by combining the data with another data set which may allow the customer to be identified).

4.2 Microsoft's Copilot is the approved general purpose AI Technology within Saxon Weald unless otherwise advised or approved. (Unapproved generative AI sources / applications are now blocked by Saxon Weald's security policies).

4.3 The following actions are prohibited.

The use of AI for any activity which involves any of the following:

- Decision Making
- Scoring
- Criminal Profiling
- Inferring or recognising emotions
- Facial Recognition
- Employee Data

4.3 Saxon Weald will regularly review the lists of approved and prohibited activities based on business need as our maturity with AI technology improves. If you are considering the use of AI technologies for other purposes than those approved in 4.1 above, you must seek approval from the Head of Data before any activity commences.

4.4 Saxon Weald will identify and categorise AI systems per the EU AI Act's distinctions:

- Prohibited AI systems.
- High-risk AI systems.
- Non-high-risk AI systems.
- General-purpose AI systems.

4.5 Where Saxon Weald deploys AI solutions, it will:

- Require third-party developers to comply with contractual obligations regarding roles, data handling, and intellectual property.
- For AI solutions involving personal data, conduct Data Protection Impact Assessments (DPIA) to evaluate risks and compliance.
- Ensure input data is relevant, representative, and unbiased.

- Train users on the systems' functionality, limitations, and compliance with confidentiality standards.
- Conduct Artificial Intelligence Impact Assessments (AIIAs) on any planned AI tools and solutions to ensure compliance with this policy, related principles and regulations. These will include:
 - Documenting adherence to principles such as transparency, fairness, privacy, and accountability.
 - Risk assessments and mitigation strategies.
 - Safeguards against potential threats and misuse.
 - Monitoring and auditing system inputs and outputs for anomalies and vulnerabilities.
 - Ensure the data sources over which AI is deployed are approved for such to ensure essential security controls are maintained.

5.0 Value for money

- 5.1 Saxon Weald aims to maximise value for money by:
- Training staff to reduce external consultation costs.
 - Adopting cost-effective AI solutions.
 - Avoiding unnecessary development costs by leveraging existing tools

6.0 Monitoring and review

- 6.1 Saxon Weald's Data Team will oversee any AI evaluations or implementations, reporting risks and ensuring compliance.
- 6.2 This policy will be reviewed annually to ensure that it reflects the needs of our customers, good practice, and changes to legislation or regulation.

7.0 Equality and diversity

- 7.1 Equality and diversity affect all aspects of our business and, as such, its principles are integral to everything we do. As a landlord and an employer, Saxon Weald aims to recognise and respond positively to people's differences, while providing equality of opportunity in relation to the services and careers we provide and support.
- 7.2 This means that no person or group of people, either working for Saxon Weald or seeking housing, services, employment or contracts from us, will be treated less favourably because of their or their partner's, family's, friend's or associated person's protected characteristics, which are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race and ethnicity, nationality, immigration status, religion or belief, gender and sexual orientation. This includes individuals either already serving on or applying to join our Board.
- 9.3 AI systems will be evaluated for potential bias to uphold fairness and inclusivity.

Version	Amendment	By	Date
1.0	Document Creation	Lee Bailey	13/01/2025
2.0	Document Amendment	Debbie Chun	13/02/2025

3.0	Document Amendment	Lee Bailey	25/03/2026