Yn greiddiol i'n gwerthoedd...

PARCH RESPECT ...is core to our values

CYDRADDOLDEB EQUALITY | YMDDIRIEDAETH TRUST | TEGWCH FAIRNESS | GONESTRWYDD HONESTY | UCHELGAIS AMBITION

FFURFLEN MANYLION / INFORMATION SHEET

Document Title:	Artificial Intelligence (AI) Policy
Document Type:	Policy
Document Owner:	Director of Bilingual Development, Learning Resources and Skills
Responsible Executive Director:	Executive Director, Academic Services
Purpose:	This policy establishes a framework for the ethical and effective integration of generative AI within Grŵp Llandrillo Menai, ensuring responsible use in teaching, learning, assessment, and administrative processes.
Review Cycle:	**Annually**

Links to Strategic Plan (please delete those that do not apply):	
Leading the way in a Modern World/ Learner opportunity and success / Driving the economy through skills & knowledge	
Link to Risk Register (please delete those that do not apply):	
STR0003 The Grŵp does not support the Regional Skills Partnership and meet their priorities and vice versa STR0005 Data confidentiality and compliance is not maintained. STR0008 Concerns re. quality of learning experience. STR0009 - IT effectiveness and resilience STR0012 IT effectiveness and resilience is not in place or sufficient for needs of the organisation	
Link to our Values (please delete those that do not apply):	Equality / Trust / Fairness / Honesty / Ambition

Approval Checklist – delete if not applicable (to be instigated by Owner):	**Date:**
• Initial Impact Assessments	**14.04.2026**
• First draft uploaded to Grŵp Portal for initial consultation with staff (via RL)	**16.04.2026**
• First draft sent to JCC for initial 2 week consultation (via RL)	**16.04.2026**
• FInal Impact Assessments completed (if applicable)	**-**
• Final draft presented to TS	**18.05.2026**
• Final draft presented to JCC (if applicable)	**17.06.2026**
• Final draft presented to SHE (if applicable)	**n/a**

● Union Approval at JCC	**17.06.2026**
● Policy presented to Quality Committee	**22.06.2026**
● Policy presented to Board	**25.06.2026**
● Policy translated and uploaded to Grŵp Portal	**19.08.2026**

1. INTRODUCTION

1.1. Generative Artificial Intelligence (AI) applications offer significant potential to enhance the quality of education and streamline administrative processes, but their use must align with ethical, legal, transparent and educational standards. The aim of this policy is to promote the responsible, ethical, and effective use of generative AI within Grŵp Llandrillo Menai (the Grŵp), enhancing the educational experience, and respecting the rights of all individuals. The Grŵp recognises that AI skills will increasingly become an essential skill for learners within the modern workplace and are committed to the responsible use of generative AI to improve teaching and learning practice and to enhance the learning experience.

1.2. This policy provides a framework for the ethical use of generative AI technologies outlining both the possibilities of AI and the challenges, ethical implications, and practical limitations of AI and to outline the approach to generative AI within the Grŵp.

1.3. The policy supports the Grŵp's strategic vision to lead the way in a modern world and being at the leading edge of digitalisation.

1.4. The policy complies with relevant legislation, including GDPR for data protection, and follows guidelines from the Joint Council for Qualifications (JCQ), the Department for Education, and Jisc's Principles for the Use of AI in Further Education Colleges.

1.5. This policy is supported by **'Staff Procedures - Use of Generative AI'** and **'Learner Procedures - Use of Generative AI'** which also complies with relevant legislation.

1.6. If any member of staff requires assistance with understanding or implementing this policy, particularly where the reasons for this are related to disability, religion or belief, sex, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership, age or race they should contact the Senior Equality Officer or the Human Resources department, in the first instance for advice.

1.7. In line with the Grŵp's Welsh Language Policy, the use of generative AI must actively support and not detract from the use of the Welsh language, ensuring that all AI-generated materials for public or official use meet the same high standards of accuracy and quality as English counterparts, particularly regarding translation and cultural appropriateness.

2. POLICY STATEMENT

2.1. Generative AI presents a huge opportunity for change in the way we work, teach, learn, and assess. The Grŵp recognises the importance of embracing generative AI to broaden opportunities for learners and support staff workload. This policy applies to all staff and associated stakeholders within the Grŵp, encompassing all forms of generative AI use in administrative work and educational activities, including teaching, learning, and assessment processes.

2.2. Key Principles

2.2.1. The Grŵp will provide its learners with the skills they need to make appropriate use of generative AI tools in their studies and thrive in an AI enabled workplace.

2.2.2. The Grŵp will provide training and resources to support staff in developing the skills needed to maximise the value of generative AI, helping to reduce workload and enhance learning, teaching, and the quality of service provided to learners and colleagues.

2.2.3. The Grŵp is committed to upholding academic integrity while supporting learners in developing the skills needed to use generative AI appropriately.

2.2.4. The Grŵp will work to promote the safe, ethical, and responsible use of generative AI. The Grŵp will assess and approve a list of 'Grŵp supported AI tools', prioritising those

within the Google Workspace for Education ecosystem, such as Google Gemini, which offers comprehensive functionality including text and image generation. Where a Google Workspace tool provides an equivalent capability, other third-party tools (e.g., Ideogram) will be reviewed and removed from the approved list to streamline resources and enhance security. All approved tools will be listed on the authorised tools list.

2.2.5. The Grŵp does not allow the use of a Generative AI tool for marking learner work. The Grŵp does not allow producing work which involves sensitive organisational and learner information.

2.2.6. The fundamental creative and analytical elements of learners' submitted work must represent their own original thought and effort. Presenting AI-authored content as one's own is not acceptable.

2.2.7. The use of AI detection software is allowed only as one element of a holistic investigation into suspected malpractice. Staff must not rely solely on automated scores and must consider all available information, including their knowledge of the student's usual work standard.

2.2.8. The Grŵp will work to provide all learners with access to the AI tools that they need, within the limits of available resources and technology.

2.2.9. The Grŵp will collaborate with other educational institutions to share best practice as the technology and its application in education evolves.

2.2.10. Due to the deep integration of Google Gemini across core applications (Docs, Slides, Google Classroom) and ongoing development of integrations, the use of other general-purpose generative AI chatbots (e.g., Claude, ChatGPT) is not required or supported for official Grŵp activities. Staff and learners must exclusively use approved tools to ensure security and compliance.

2.2.11. The fundamental principle that Intellectual Property generated by staff or learners using Grŵp-supported AI tools for official college purposes will be managed in accordance with the Grŵp's existing **HE Intellectual Property Rights and Copyright Policy**. Users must ensure all AI-generated content is reviewed for copyright compliance before external publication.

2.3. These principles recognise the risks and opportunities of generative AI and commit the Grŵp to helping staff and learners become leaders in an increasingly AI-enabled world.

3. UNDERSTANDING GENERATIVE AI

3.1. Generative AI refers to a subset of artificial intelligence technologies that can be used to create new content based on large volumes of data that models have been trained on. Generative AI works by learning from vast amounts of data, understanding patterns, styles, or structures within that data, and then using that understanding to create new content that mimics the original data in a creative way.

3.2. What Can Generative AI be Used For?

3.2.1. Examples of how generative AI can be used include:

- answering questions where answers are based on material that can be openly found on the Internet
- understanding complex materials and ideas in a way that is relatable to students
- overcoming writer's block by giving inspiration for points to consider

- coherently drafting ideas around a topic by summarising key points
- planning and structuring ideas for written work or presentations
- exploring different writing styles and approaches intended for a variety of audiences
- reviewing, evaluating and critically analysing written materials
- identifying issues in academic writing style, grammar or structure that you can then address
- debugging code
- generating ideas for the presentation of data, creation of visuals, graphs or images
- summarising students' notes
- quickly transcribing spoken word or describing the contents of images

4. BENEFITS OF GENERATIVE AI FOR LEARNERS

4.1. Incorporating generative AI into educational practices presents an opportunity to transform traditional learning models, making education more inclusive, engaging, and tailored to the needs of the digital generation. Some of the benefits to learners include:

4.1.1. 24/7 availability so learners can access support whenever they need it.

4.1.2. Self-paced learning so learners can progress at their own pace.

4.1.3. Conversational AI interfaces can make learning interactive and engaging.

4.1.4. AI tools can tailor educational content to suit individual learner needs and preferences.

4.1.5. Can stimulate creativity and support learners in exploring new ideas and concepts.

4.1.6. Support for language learning.

4.1.7. Provide immediate feedback on assignments, quizzes, and other learning activities.

4.1.8. Improve accessibility for learners with disabilities by creating customised learning materials and interfaces.

4.1.9. Working with generative AI tools can help learners develop digital literacy, critical thinking, and problem-solving skills.

5. BENEFITS OF GENERATIVE AI FOR STAFF

5.1. It is important that staff remain fully involved in the oversight and quality assurance of AI generated content and assessments to ensure accuracy and relevance and AI tools must be used responsibly, ensuring they complement traditional teaching methods and uphold academic integrity.

5.2. Generative AI tools can be used by staff to support them in their role and the impact on staff workload can be significant. Some of the benefits include:

5.2.1. Accelerating workflows by drafting initial content for a variety of needs, such as emails, social media posts, or grant applications and proposals.

5.2.2. Quickly transcribing spoken words or describing the contents of images.

5.2.3. The efficient creation of content for teaching materials and assessments.

5.2.4. Immediate, automated guidance on learning activities.

5.2.5. Support for diverse learning needs through the creation of tailored and adapted materials and assessments.

5.2.6. Creation of dynamic, engaging, and up to date teaching materials that employ innovative pedagogical approaches.

5.2.7. Support for professional development of staff through access to learning resources, and the latest research in their field.

5.2.8. Translation services and language learning aids.

5.2.9. Generating ideas to support a range of roles, for example, undertaking research into how learners with Additional Learning Needs might access support.

6. RISKS OF USING GENERATIVE AI

6.1. The content produced by generative AI could be:

6.1.1. inaccurate

6.1.2. inappropriate

6.1.3. biased

6.1.4. misrepresentative and misleading

6.1.5. taken out of context and without permission

6.1.6. out of date or unreliable

6.1.7. Intellectual Property (IP) and Copyright infringement of generated material

6.2. Use of generative AI tools by learners could lead to increased cases of academic misconduct through AI misuse. The appropriate use of AI for learning and assessment is outlined in the **'Staff Procedures: Use of Generative AI'** and **'Learner Procedures - Use of Generative AI'**.

6.3. Generative AI carries the risk of creating profiles or categorisations of individuals based on generated or inferred data, potentially leading to unfair or discriminatory outcomes.

6.4. There is a risk that user data provided to or generated by generative AI could be misused, potentially compromising privacy or security.

6.5. The use of generative AI may inadvertently expose or make identifiable sensitive organisational data through its processing or outputs.

7. STAFF RESPONSIBILITIES

7.1. Staff will only use Grŵp Supported AI Tools for the purpose of their work.

7.2. The College's teaching and learner support staff play a pivotal role in guiding and supervising the ethical use of generative AI in education. Responsibilities encompass:

7.2.1. Taking part in training on the benefits, risks, and ethical use of generative AI.

7.2.2. Integrating AI understanding and application within the curriculum.

7.2.3. Signposting to learners where to find guidance on acceptable use of generative AI.

7.2.4. Informing learners of the actions that will follow and possible consequences if AI misuse is suspected.

7.2.5. Monitoring learner submissions for possible AI misuse.

7.2.6. Ensuring alignment with JCQ guidelines and relevant exam board guidelines on AI's role in assessments.

7.3. Generative AI creates new opportunities for staff to develop educational content and teaching activities. When planning for the use of AI tools with learners, staff need to consider:

7.3.1. **Age restrictions** on tools and parental consent requirements for learners under the age of 18 (please refer to the 'Staff Procedures: Use of Generative AI' for further details).

7.3.2. Data privacy terms for the AI tool (if outside Grŵp approved tools).

7.3.3. Cost and availability of the AI tool (if outside Grŵp approved tools).

7.3.4. Digital literacy skills of their learners.

7.4. Before introducing the new technology to learners, staff need to verify that the AI tool they are planning to use with learners is supported for use by the Grŵp.

7.5. All output generated by staff using AI should be checked for:

7.5.1. Accuracy and reliability.

7.5.2. Indication of bias.

7.5.3. Appropriateness for context.

7.6. Any prompts or file uploads used by staff in generative AI tools **should not include any personal details or any other sensitive information** relating to the Grŵp or an individual. *This includes, but is not limited to: unreleased financial data, internal strategic documents, confidential meeting minutes, non-public curricula, or unanonymised learner/staff feedback.*

8. LEARNER RESPONSIBILITIES

8.1. Learners will only use Grŵp Supported AI Tools for the purpose of their work.

8.2. The Grŵp will provide appropriate opportunities for learners to undertake training on safe, appropriate and ethical use of generative AI tools.

8.3. While learners are encouraged to utilise generative AI to enhance their learning, they must strictly adhere to guidelines set out in the Learner Procedures - Use of Generative AI, Assessment Policy for Further Education, Adult and Community Learning and Work Based Learning, HE Assessment Policy and/or HE Unfair Practice Policy for all forms of assessment and adhere to the following:

8.3.1. Not presenting AI-generated content as their own original work.

8.3.2. Appropriate referencing of AI-derived content, acknowledging that it won't be credited on its intrinsic merit.

8.3.3. Detailed acknowledgment of AI tools utilised, ensuring the retention of evidence of their usage, including a copy of their prompts and the AI generated output in a non editable format.

8.3.4. Recognising AI's potential limitations, biases, and the risks of misinformation.

8.4. Any prompts or file uploads used by learners in generative AI tools **should not include any personal details or any other sensitive information** relating to the Grŵp or an individual.

9. MONITORING AND REVIEW

9.1. The Grŵp recognises the rapidly evolving nature of generative AI technology and will monitor this policy on an ongoing basis. The policy will be formally reviewed every year or sooner if required.

9.2. The implementation of the AI Policy will be monitored by the Grŵp's Learning Technology Strategic Group. This group is chaired by a member of Tîm Polisi (Executive Team) and consists of a cross-section of staff representatives. The group will meet on a half-termly basis, or more frequently as necessary.

9.3. The Learning Technology Strategic Group will oversee the implementation of the Digital Learning Strategy and Action Plan and will make recommendations for any actions required by the organisation to improve its practices in relation to digital learning and use of generative AI.

9.4. The AI Working Group will meet regularly (monthly where possible) to continually review generative AI tools, including changes or developments in tools and to share good practice. This group will report to the Learning Technology Strategic Group.

9.5. Before any new non-Google Workspace AI tool is authorised, particularly those processing personally identifiable information (PII), a formal assessment of its UK-GDPR status must be conducted and verified for compliance. This assessment should be carries out by the AI working group.

10. OTHER RELEVANT POLICIES/ GUIDANCE DOCUMENTS

This Policy should be read alongside:

- Staff Procedures: Use of Generative AI
- Learner Procedures: Use of Generative AI
- Digital Learning Strategy
- Teaching and Learning Strategy
- GDPR Policy
- Assessment Policy for Further Education, Adult and Community Learning and Work Based Learning
- HE Assessment Policy
- HE Unfair Practice Policy
- Staff Code of Conduct
- Learner Conduct and Positive Behaviour Policy
- HE Intellectual Property Rights and Copyright Policy
- Welsh Language Policy

11. REPORTING

11.1. The Director Bilingual Development, Learning Resources And Skills, and the Digital Learning and Library Manager are responsible for reviewing the policy. All learners, staff and Grŵp Board members have a responsibility to act in accordance with this policy.

12. SCOPE OF THE POLICY

12.1. This policy relates to:

- Job applicants and potential applicants
- Current employees
- Current learners
- Contract workers/suppliers
- Agency workers
- Trainee workers and students on work experience or placements
- Volunteers
- Governors

Equality Impact Assessment

Assessment completed by:	Siân Pritchard	**Dated:**	14/04/2026
Assessment approved by:		**Dated:**	

Consideration	Response	Special requirements / controls
Which protected groups might be disadvantaged by the policy/process?	AI is subject to bias due to the way the training models have been undertaken and the bias in the information that is used to train the generative AI. Examples of these bias include: ● Selection Bias: Occurs when training data is not representative of the real-world population. For example, if a facial recognition model is trained mostly on lighter-skinned individuals, it may struggle to accurately identify people with darker skin tones, leading to discriminatory outcomes. ● Confirmation Bias: This occurs when an AI system is overly reliant on pre-existing patterns in the data, reinforcing historical prejudices. For instance, if a hiring algorithm learns that past successful candidates were predominantly men, it may favour male applicants in the future. ● Measurement Bias: Happens when the data collected systematically differs from the true variables of interest. For example, if a model predicts student success based only on those who completed an online course, it may fail to account for those who dropped out, leading to misleading conclusions. ● Stereotyping Bias: Occurs when AI systems reinforce harmful stereotypes. For example, a translation model that consistently associates the word "nurse" with female pronouns and "doctor" with male pronouns perpetuates gender bias. Similarly, an image-generation model that portrays engineers as predominantly male contributes to occupational stereotyping. ● Out-Group Homogeneity Bias: This bias causes an AI system to generalise individuals from underrepresented	Human oversight is essential in ensuring that bias is identified and mitigated in any generative AI produced information. Grŵp training programmes should ensure that this is covered as part of upskilling both staff and learners when using generative AI. Section 1.6 of the policy offers additional mitigation in the form of advice and guidance for staff, particularly in relation to protected characteristics. Staff are prompted to contact the Grŵp's Senior Equality Officer and/ or the HR department for support.

	groups, treating them as more similar than they actually are. For instance, facial recognition systems often struggle to differentiate between individuals from racial or ethnic minorities due to insufficient diversity in training data. This can lead to misclassification and discriminatory practices, such as wrongful arrests in law enforcement. (Chapman University, https://www.chapman.edu/ai/bias-in-ai.aspx , accessed 11.03.2025). "Additionally, the widespread use of AI can exacerbate existing inequalities, particularly affecting women, minorities and individuals from low-income backgrounds. This is primarily driven by biases and poor quality in the training data, such as the scarcity of data from underrepresented groups resulting in decisions favouring other groups [7,8]." (Artificial Intelligence (AI) end-to-end: The Environmental Impact of the Full AI Lifecycle Needs to be Comprehensively Assessed - Issue Note accessed 11.03.2025)	
Which protected groups might benefit from the policy/process?	The AI policy has the potential to significantly benefit several protected groups. Learners with disabilities can gain access to personalised learning experiences, adaptive interfaces, and assistive technologies, enhancing their inclusion and learning outcomes. Learners with diverse learning styles can benefit from AI's ability to tailor educational content and delivery methods to individual needs. Learners with English as an additional language can utilise AI-powered translation tools and language learning resources. Furthermore, learners who require flexible learning options, such as those with caring responsibilities, can benefit from the 24/7 availability and adaptive nature of AI tools.	
Does the policy advance equality and foster good relations?	When implemented effectively, the AI policy has the potential to advance equality by promoting inclusive learning experiences through personalised AI tools and ensuring equal access to AI resources and training. By actively addressing potential biases in AI algorithms, along with the provision of an 'approved AI Tools list', the policy can	Continuous monitoring and evaluation are essential to ensure that AI tools are used equitably and do not perpetuate existing inequalities.

	contribute to a more equitable learning environment. Additionally, by promoting digital inclusion and providing comprehensive training to all staff, the policy can foster good relations among diverse groups. However, continuous monitoring and evaluation are essential to ensure that AI tools are used equitably and do not perpetuate existing inequalities.	
Could any part of the process discriminate unlawfully?	By establishing clear procedures for the use of AI, the policy proactively addresses potential areas of concern, such as biased algorithms or accessibility issues. Without such a policy, the Grŵp would be significantly more vulnerable to discriminatory practices arising from the use of AI. This policy provides a framework for regular audits and reviews, enabling us to identify and mitigate potential discriminatory practices. It ensures that all aspects of AI implementation are aligned with equality legislation and best practices, thereby strengthening our commitment to an inclusive and equitable learning environment. The Grŵp's AI working group will meet monthly to review the appropriateness of AI Tools and consider which, if any tools, should be added to or removed from the approved list. This oversight will ensure that all learners and staff have access to appropriate tools.	
Are there any other policies that need to change to support the effectiveness of this one?	To ensure the AI policy's effectiveness and maintain consistency across the Grŵp, existing policies will be reviewed and updated during their scheduled review periods to explicitly consider the implications and integration of AI. This proactive approach will ensure that all relevant policies are aligned with the principles and guidelines established in the AI policy.	
Conclusion	Continue the policy	

SIGNED:	Siân Pritchard	**Dated:**	14/04/2026

Welsh Language Impact Assessment

Assessment completed by:	Siân Pritchard	**Dated:**	14/04/2026
Assessment approved by:		**Dated:**	

Consideration	Response	Special requirements / controls
What positive effects will the implementation of the policy or procedure have on the use of Welsh language?	The implementation of the AI policy presents opportunities to enhance the use of the Welsh language within the Grŵp. AI tools, when properly utilised, can be used to create and translate educational materials into Welsh, supporting learners and staff in accessing information and resources in their preferred language. AI-powered language learning tools can also be employed to promote and facilitate the learning of Welsh, contributing to the Grŵp's efforts to increase the use of the language. Furthermore, AI can assist in the creation of Welsh language content for communication and marketing purposes, strengthening the Grŵp's bilingual identity. The addition of section 1.7 in the most recent review cycle strengthens the positive effects of this policy's implementation on the Welsh language, reminding users of AI of the need to ensure accuracy and cultural appropriateness of Welsh language materials created using AI, in line with the requirements of the Welsh Language standards. "1.7 In line with the Grŵp's Welsh Language Policy, the use of generative AI must actively support and not detract from the use of the Welsh language, ensuring that all AI-generated materials for public or official use meet the same high standards of accuracy and quality as English counterparts, particularly regarding translation and cultural appropriateness."	
What negative effects will the implementation of the policy or procedure have on the use of Welsh language?	There is a potential risk that the implementation of AI tools may inadvertently diminish the use of the Welsh language if careful consideration is not given to language support. Some AI language models may not be as robust or accurate in Welsh as they are in English, potentially leading to lower quality translations or content. If AI generated content is not carefully verified by Welsh speakers, it could also lead to errors that damage the reputation of the Welsh language within the Grŵp. There is also a risk that over-reliance on English-centric AI tools could lead to a decline in the creation and use of original Welsh language content. Therefore, it is essential to ensure that AI tools and resources are developed and	Ensure that Welsh language materials and services are of the same quality as their English counterparts. This includes accurate translations, grammatically correct Welsh, and culturally appropriate content. Ensure the continued offer of Welsh language spell checkers, and translation tools.

	implemented with a strong emphasis on Welsh language support and quality. The addition of section 1.7 in the most recent review cycle will reduce negative effects of this policy's implementation on the Welsh language, reminding users of AI of the need to ensure accuracy and cultural appropriateness of Welsh language materials created using AI, in line with the requirements of the Welsh Language standards. "1.7 In line with the Grŵp's Welsh Language Policy, the use of generative AI must actively support and not detract from the use of the Welsh language, ensuring that all AI-generated materials for public or official use meet the same high standards of accuracy and quality as English counterparts, particularly regarding translation and cultural appropriateness."	When using AI tools, ensure that the tools used have a high level of Welsh language support, and that the outputs are checked by the translation team (or those who are confident Welsh speakers).
Are there sufficient Welsh-speaking staff available to implement the policy or procedure?	The Grŵp has Welsh speaking staff across the organisation. There may be some departments where there are low or no fluent Welsh speakers. The Grŵp has an internal translation team who are available to support with proof reading of AI generated Welsh language content, as part of the Grŵp's central Bilingual Development and Equality team.	
If not, what steps will be taken to ensure that sufficient staff are available, and by when?	We have a translation team as well as Welsh language facilitators, Bilingual Development Officer, Coleg Cymraeg Cenedlaethol Branch Officers who can support the Welsh language aspect of AI work.	
Does the policy or procedure comply with Grŵp Llandrillo Menai's Welsh Language Schemes/Language Strategy?	The AI policy has been developed with careful consideration of Grŵp Llandrillo Menai's Welsh Language Schemes and Language Strategy. The policy aims to support and enhance the use of Welsh by integrating AI tools in a way that promotes bilingualism and respects the linguistic rights of learners and staff. The policy will be reviewed regularly to ensure ongoing compliance with the Grŵp's Welsh language commitments, and to ensure that the use of AI tools does not negatively impact the Welsh language.	
Conclusion	Continue the policy	

SIGNED:	Siân Pritchard	**Dated:**	14/04/2026

Sustainability Impact Assessment

Assessment completed by:	Diane Sinclair	**Dated:**	16 April 2026
Assessment approved by:		**Dated:**	

Consideration	Response	Special requirements / controls
How will this policy impact upon the Grŵp's sustainability strategy?	This policy will not have a direct impact on the Grŵp Sustainability and Environmental Policy. It should be noted, however, that while AI offers many significant benefits, its use requires substantial water and energy resources, which have a global impact on the environment. By setting clear guidelines on what and how AI should be used, the policy addresses the 'S' in ESG (environmental, social & governance). The policy prevents automation of systemic bias, ensuring use remains socially sustainable and inclusive.	Awareness of the global impact that AI has on energy and water resources
Conclusion	Continue the Policy and process.	

SIGNED:	D Sinclair	**Dated:**	16 April 2026