

The Wisdom Council's Use of Ai Policy

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This policy sets out The Wisdom Council's approach to the use of Artificial Intelligence or Large Language Model tools (collectively referred to in the remaining of this document as 'AI' and 'LLM' respectively) as part of its business operations (internal and externally).

1. Policy's aim and purpose

This policy aims to provide a framework that:

- Employees
- Consultants
- Suppliers
- The Board, and
- Any other stakeholders

working for or on behalf of The Wisdom Council can use to understand the company's position on the use of such technologies within its operations. As result, this policy intends to ensure that the use of AI is ethical, complies with all applicable laws and regulations and complements The Wisdom Council's existing information and security policies.

It is important to also note that, due to the pace of development and application of AI, as well as guidance and regulations, this policy will be reviewed a minimum of every six (6) months.

2. What is Artificial Intelligence (AI) or Large Language Model (LLM)?

Artificial Intelligence (AI) refers to technology that allows computers to think and learn in ways that mimic human intelligence — for example, recognising patterns, understanding language or making predictions.

A Large Language Model (LLM) is a type of AI that has been trained on vast amounts of text (like books, websites and articles) to understand and generate human-like language. Tools such as ChatGPT, Claude or Grammarly are examples of LLMs.

They can be used to:

- Write or summarise documents
- Analyse large volumes of text quickly
- Help with research or brainstorm ideas
- Translate or simplify complex information
- Automate routine communication/operations tasks

LLMs don't "know" facts like humans do — they generate responses based on patterns in the data they were trained on, so it's **always important to fact-check their answers**.

3. Goals for use of Artificial Intelligence/Large Language Model tools

At The Wisdom Council, we understand that AI and LLMs are increasingly being used across industries, including in research, for its potential to bring substantial benefits to the way services are delivered. If used safely and appropriately, these tools have the potential to enhance our business operations and improve how we manage and use

data to help us provide more innovative solutions for the issues the financial industry is facing.

AI and LLM use should be **to enhance, not replace, human expertise** and to align with TWC's commitment to insight quality, data integrity and client trust. Some of our goals in using AI include (but are not limited to):

1. **Improving Efficiency**, by streamlining internal workflows, automating routine tasks and reducing time spent on administrative or repetitive work (where relevant);
2. **Enhancing Insight Quality**, by supporting better analysis and storytelling through faster summarisation of *non-identifiable* data and background research;
3. **Encouraging Innovation**, by exploring new ways of presenting insight and improving community engagement (safe, ethical and transparently);
4. **Maintaining Compliance and ethical standards** by ensuring every use of AI complies with **GDPR, client NDAs and/or contracts** and **TWC's policies** with human oversight central at all stages.
5. **Promoting Responsible Use**, by educating other employees to treat AI as a **supporting tool**, not a substitute for human judgement, expertise or creativity.

4. Appropriate use of Ai and LLM tools

Despite its benefits and potential, all TWC stakeholders must understand the risks and rules regarding the use of these technologies.

4.1 Appropriate Use of AI and LLMs at TWC

The following tools are approved by TWC for use as set out below. All outputs should be reviewed by a human before being used and specifically before being shared to any third party or client. This includes meeting notes.

- Tools which are embedded into our Microsoft 365 environment such as CoPilot and associated links to other Apps, LLMs, etc
- Tools which have been approved by TWC following due diligence and which have a TWC connected log-in and policies. See Section below for updated list.

Wherever the LLM is operating outside our Microsoft 365 environment no PI, restricted or highly confidential data should be entered into the tool without prior agreement from a TWC stakeholder. For information on data classification, please see the Business Systems and Risk Controls Policy.

Appropriate use of LLMs and AI Tools:

1. **Research Assistance:**
 - Using AI to summarise publicly available reports or articles.
 - Drafting background notes or discussion points on general industry topics.
 - Generating ideas for survey design or discussion guides based on set

project objectives and brief.

2. Writing & Editing Support:

- Proofreading or improving readability of internal documents, templates or website text.
- Creating first drafts for newsletters, training materials or thought pieces.

3. Data Handling (must be previously agreed):

- Analysing anonymised, aggregated or synthetic datasets for trend spotting or concept testing.
- Using AI to analyse research data and participant responses where the AI tool is embedded in/part of a pre-approved research platform used by TWC.
- Generating code snippets for visualisations in **Power BI** or **Excel**, where no sensitive data is exposed.

4. Operational Efficiency:

- Summarising meeting notes, project updates or documents with no personally identifiable information.
- Supporting project management tasks (e.g. generating checklists or timelines).

All outputs must be reviewed for accuracy and tone **before used or circulated**.

4.2 Not appropriate/Allowed Use of AI and LLMs

The following uses of AI and LLM tools are not allowed/strictly prohibited.

1. Client/Participant Research Data:

- Entering any personally identifiable client or research activity data to non-approved AI tools (these include free/public versions of approved AI tools).
- Using AI outputs to form conclusions or insights without human verification.

2. Automated Decision Making:

- Using AI to make or suggest decisions about individuals (e.g. profiling members or clients) without human verification.
- Any activity that could influence business recommendations without expert human oversight.

3. Intellectual Property & Security Risks:

- Using AI to recreate client materials, proprietary models or content owned by others.
- Uploading internal documents, proposals or deliverables to public/free versions of AI tools (e.g. ChatGPT, Claude, Gemini).

5 Data and Security

Protecting data integrity, confidentiality and security is critical to The Wisdom Council's operations and reputation. The use of Artificial Intelligence (AI), including generative AI tools, must not compromise client trust, legal obligations or information security. All employees, researchers, contractors and managers are responsible for

complying with the requirements set out below.

5.1 Data Protection and Acceptable Use

- Live client data, participant data or any personally identifiable information (PII) must never be shared with public or consumer AI tools (e.g. ChatGPT or similar).
- Sensitive information, including login credentials, access tokens, internal system details or commercially sensitive client materials, must not be entered into any AI system **unless explicitly approved**.
- AI tools should be treated as external third parties that are not under a non-disclosure agreement (NDA) unless contractually confirmed otherwise.
- Client Managers are responsible for enforcing acceptable use rules based on what is appropriate for each client and individuals must always demonstrate appropriate and responsible use.

5.2 Information Governance and Regulatory Compliance

While there is currently no single piece of legislation dedicated solely to AI, any AI system that processes or interacts with personal data falls within the scope of:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA)

This applies to any personal data held or processed by TWC, including data relating to employees, research participants or client contacts.

When using or implementing AI tools, colleagues must consider:

1. Data protection and privacy risks
2. Legal and contractual obligations
3. Bias and discrimination risks
4. Security and data sovereignty considerations
5. The nature and sensitivity of the data involved

Where a new AI system is introduced or an existing system is enhanced in a way that involves personal data, a Data Protection Impact Assessment (DPIA) must be completed at the outset. The Head of Operations and Platforms must be consulted for advice and guidance in all such cases.

TWC aligns its practices with guidance issued by the Information Commissioner's Office (ICO) and recognised government data ethics frameworks.

5.3 Confidentiality and Commercial Sensitivity

Confidential, proprietary or commercially sensitive information must not be entered into **public versions of or on unauthorised** AI tools. Doing so could result in:

- ✓ Unintentional disclosure

- ✓ Loss of confidentiality
- ✓ Breach of contract or confidence
- ✓ Legal or regulatory action

Examples of **prohibited** use for public or unauthorised AI tools include:

- Uploading spreadsheets containing client or participant sensitive data for AI analysis
- Using AI tools to draft client correspondence containing personal details
- Recording, transcribing or translating meetings using AI apps on personal/non-compliant devices

Use of AI is **only permitted** where the tool has been:

- ✓ Approved by TWC
- ✓ Procured through appropriate due diligence
- ✓ Contractually restricted to TWC's use
- ✓ Assessed for security and data protection compliance

5.4 Copyright and Intellectual Property

All users must comply with copyright and intellectual property laws when using AI tools. AI must not be used to generate content that infringes on third-party intellectual property rights.

If there is any uncertainty regarding copyright or ownership of AI-generated content, the issue must be escalated to senior management before use.

5.5 Data Retention and Security Controls

- ✓ Personal data must only be retained for as long as necessary to fulfil its intended purpose, in line with UK GDPR, DPA and TWC data retention requirements.
- ✓ AI-generated content containing sensitive or client-related insights must not be retained beyond the project lifecycle unless anonymised and approved.
- ✓ Where data is shared with third-party platforms, TWC ensures appropriate contractual, technical and organisational safeguards are in place.
- ✓ Access to data and systems is restricted to authorised individuals only, in line with TWC's information security controls.

5.6 Accuracy and Human Accountability

AI systems may generate inaccurate or misleading information. As such:

- All AI-generated content **must** be reviewed, validated and edited by a human before use.
- AI outputs **must not** be relied upon as factual without verification.
- Responsibility for accuracy remains with the individual using the AI tool.

If there is doubt about the correctness or reliability of AI-generated output, **it must not be used**.

5.7 Transparency and Disclosure

TWC is committed to transparency in the responsible use of AI. Where AI-generated content is used in internal or external materials, this should be **clearly disclosed**.

Example disclosure:

Note: *Our senior team provides the strategic interpretation, drawing on 15 years' sector experience. We use AI selectively for data processing to enable deeper analysis.*

6. Overcoming AI Bias

AI systems can inadvertently perpetuate biases present in training data. To ensure that all work and content created for The Wisdom Council and its clients does not further these biases, all employees are responsible for:

- **Bias Identification:** Review and edit all work created with the assistance of generative AI for social or data biases.
- **Inclusive Data:** Be mindful of generative AI data inputs and how they will affect output. Use diverse and representative datasets when training AI models to create work on behalf of The Wisdom Council.
- **Bias Mitigation:** Develop and share with your manager how you will implement strategies and processes to reduce bias in AI outputs.

7. Approved AI Tools

The following tools are generally accepted for use at The Wisdom Council with adherence to the guidelines above. Please use the official login and account when provided.

- ✓ AI features in Recollective, Forsta
- ✓ Bing AI/Microsoft Copilot
- ✓ Co-Loop
- ✓ Flowres
- ✓ Fireflies
- ✓ Claude/ChatGPT/Perplexity non-free version

Many other AI-driven platforms and tools may be acceptable. In doubt, please discuss the use of any other tools with your line manager or key stakeholder.