LGOIMA

When releasing responses to previous LGOIMA requests, names and contact details of individual requestors will be withheld to protect their privacy.

Information requested by the media, lobby groups, public sector organisations and MPs will always be published, while information specific to an individual or their property will not generally be published.

Request from:	Private Individual
Information requested:	AI policies
Response by:	Barbara Phillips. Chief Executive

Private Individual
Via Email:

Dear Private Individual

Official information request for policies around the use of generative AI

I refer to your official information request dated 25 June 2025 for policies around the use of generative AI.

You have asked for the following information:

1. **Does your council currently have a policy governing the use of generative AI by staff?**

   Yes, Westland District Council currently has a formal Policy on Artificial Intelligence, which includes provisions relevant to the use of generative AI by staff. In addition, the Council has developed a separate guidance document specifically addressing the responsible and appropriate use of generative AI technologies within the organisation.

2. **If so, can I please have a copy of the policy?**

   Please find enclosed the Westland District Council's *Policy on Artificial Intelligence* along with the accompanying *Generative AI guidance*. These documents outline the principles, responsibilities, and operational expectations for staff when engaging with AI technologies in the course of their duties.

3. **If not, are you in the process of developing such a policy?**

   This query is not applicable, as the Council already has an established policy and guidance in place regarding the use of artificial intelligence and generative AI tools.

There will be no charge in supplying this information to you. **Council has adopted a Proactive Release Policy and accordingly may publish LGOIMA responses on the Council Website at** https://www.westlanddc.govt.nz/lgoima-responses. The collection and use of personal information by the Westland District Council is regulated by the Privacy Act 2020. Westland District Council's Privacy Statement is available on our website here

If you wish to discuss this decision with us, please feel free to contact Mary-anne Bell, Business Analyst at LGOIMA@westlanddc.govt.nz, 03 756 9091.

Sincerely,

Barbara Phillips | Chief Executive
BP/MB
Enclosed:
24.25.97 Generative AI guidance
24.25.97 Policy on Artificial Intelligence

Generative AI – Guidance Sheet

Do NOT use Generative AI to store public records.

Do NOT use Generative AI for confidential information.

Do NOT use Generative AI for customer / ratepayer records.

Be careful when analysing data with Generative AI – make sure it is only analysing the data you have provided.

Be careful that your use of Generative AI does not breach copyright or intellectual property rights.

Be aware of Generative AI use and risks around confidentiality, privacy, accuracy, bias and security.

Do use Generative AI for presentations

Do use Generative AI for analysis of public data

Do use a footnote advising that Generative AI has been used to generate information for this document.

Always use Generative AI responsibly and ethically.

If in doubt, please talk to your line manager, or a member of the Information Management Team.

Document date: 15/02/2024.

Artificial Intelligence Policy

1. Purpose

The purpose of this policy is to establish a framework for the ethical use of a Generative Artificial Intelligence Large Language Models (GenAI) such as ChatGPT, Gemini, Bing, or other similar tools.

Use of AI tools must only be used in a manner that promotes fairness and avoids biases to prevent discrimination and promote equal treatment, and in such a way to contribute positively to the Council's goals and values.

This policy is designed to ensure that the use of AI is ethical, lawful, and in compliance with all applicable laws, regulations, and Council policies, and to complement Council's existing information and security policies.

1.1 Scope

This policy applies to all employees, contractors, temporary staff, or third parties with access to GenAI, whether through council-owned or BYOD (bring your own device) in pursuit of Council activities.

1.2 Commencement

This policy comes into force on 2 February 2024.

1.3 Definitions

GenAI - Generative artificial intelligence is artificial intelligence capable of generating text, images, or other media, using generative models.

ChatGPT - ChatGPT is a large language model-based chatbot developed by OpenAI and launched on November 30, 2022, that enables users to refine and steer a conversation towards a desired length, format, style, level of detail, and language.

Data Sovereignty – the country whose laws and regulations apply to the data stored. Normally the country where the data is stored.

2. Policy

Any use of GenAI technology in the pursuit of Council activities should be done with full acknowledgement of the policies, terms and conditions of the GenAI developer/vendor.

2.1 Use of GenAI

Employees are authorised to use GenAI for work-related purposes. This includes tasks such as generating text or content for reports, emails, presentations, images, and customer service communications. Before accessing GenAI technology, Employees must first notify the Information Management Team of the intent to use GenAI, the reason for its use, and the expected information to be input as well as the generated output and expected distribution of content.

2.2 Accuracy

All information generated by GenAI must be reviewed and edited for accuracy prior to use. Employees using GenAI are responsible for reviewing output, and accountable for ensuring the accuracy of GenAI generated output before use/release. If an employee has any doubt about the accuracy of information generated by GenAI, they should not use GenAI.

2.3 Confidentiality

Confidential information must not be entered into an GenAI tool, as information may enter the public domain. Employees must follow all applicable data privacy laws and organisational policies when using GenAI. If an employee has any doubt about the confidentiality of information, they should not use GenAI.

2.4 Ethical Use

GenAI must be used ethically and in compliance with all applicable legislation, regulations, and organisational policies. Employees must not use GenAI to generate content that is discriminatory, offensive, or inappropriate. If there are any doubts about the appropriateness of using GenAI in a particular situation, employees should consult with their supervisor or Information Management staff.

2.5 Label

Content produced via GenAI must be identified and disclosed as containing GenAI-generated information. Footnote example: "Note: This document contains AI generated content. AI generated content has been reviewed by the author for accuracy and edited/revised where necessary." The author takes responsibility for this content.

3. Risks

The use of GenAI has inherent risks that employees should be aware of. A comprehensive risk assessment should be conducted for any project or process where GenAI is proposed to be used. The risk assessment should consider the potential impact of potential risks regarding legal; accuracy of output; bias and discrimination; security (including technical protections and security certifications); and data sovereignty and data protection.

3.1 Legal Information entered into GenAI may enter the public domain.

Entering data into a GEN AI system can release non-public information and breach regulatory requirements, customer or vendor contracts, or compromise intellectual property.

Any release of private/personal information without the authorisation of the information's owner could result in a breach of the principles of the Privacy Act 2020.

Any unauthorised release of public information and records may result in a breach of the principles of the Information and Records Management Standard issued under s27 of the Public Records Act 2005.

Information and records must be protected from unauthorised or unlawful access, alteration, loss, deletion and/or destruction.

Access to, use of and sharing of information and records must be managed appropriately in line with legal and business requirements.

Use of GenAI to compile content may also infringe on regulations for the protection of intellectual property rights including the Copyright Act 1994.

3.2 Accuracy of output

GenAI rely upon algorithms to generate content, and there is a risk that GenAI may generate inaccurate or unreliable information. The impact of using the inaccurate or unreliable output of GenAI should be factored into the decision to use or publish the output.

3.4 Bias and discrimination

GenAI may produce bias, discriminatory or offensive content. Employees should use GenAI responsibly and ethically, in compliance with Council policies and applicable laws and regulations.

3.5 Security

GenAI may store sensitive data and information, which could be at risk of being breached or hacked. Council must assess GenAI technical protections and security certification before use. If an employee has any doubt about the security of information input into GenAI, they should not use GenAI.

3.6 Data sovereignty and data protection

While an GenAI platform may be hosted internationally, information created or collected in New Zealand, under data sovereignty rules, is still under jurisdiction of New Zealand laws. The reverse also applies. If information is sourced from GenAI hosted overseas for use in New Zealand, the laws of the source country regarding its use and access may apply. GenAI service providers should be assessed for data sovereignty practice by any organisation wishing to use GenAI.

4. Related Documents and Acts

The following Westland District Council documents relate to this policy:

- IM Policy
- Privacy Policy
- ICT Acceptable Use Policy
- Digital Communications Policy
- Generative AI – Guidance Sheet

5. Policy Review

A review of this policy will take place in February 2025

Created:	02 February 2024	Date for review:	02 February 2025
Author:	Information Manager	Authorised by:	Executive Team
Consulted on:	N/A	Version	1.0