

8 July 2025

File Ref: OIAPR-1274023063-39917

By email:

Tēnā koe

## Request for information 2025- 198

I refer to your request for information dated 25 June 2025, which was received by Greater Wellington Regional Council (Greater Wellington) on 25 June 2025. You have requested the following:

- Does your council currently have a policy governing the use of generative AI by staff?
- If so, can I please have a copy of the policy?
- If not, are you in the process of developing such a policy?

I'd also welcome any examples of innovative uses of generative AI by your council to support the work it does."

## **Greater Wellington's response follows:**

Attached, as requested, is Greater Wellington's Artificial Intelligence Management Policy, which became effective on 12 April 2025.

GW AI Management Policy and Guidelines - Release v1.0.pdf

Greater Wellington is undertaking incremental rollout of use cases underpinned by AI technologies and based on anticipated return on investment. Those planned include:

- Administrative assistance
- Information management
- Consultation feedback analysis
- Cyber security
- Policy education

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Local Government Official Information and Meetings Act 1987.

Please note that it is our policy to proactively release our responses to official information requests where appropriate. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā

Julie Knauf

Kaiwhakahaere Matua Ratonga Rangapū | Group Manager Corporate Services



Greater Wellington Artificial Intelligence (AI) Policy		
Purpose	This policy establishes guidelines for the responsible use of Artificial Intelligence (AI) Tools within Greater Wellington to maximise benefits while managing associated risks.	
Vision	To harness Al's potential in enhancing operational efficiency, decision-making, and innovation, while ensuring ethical, transparent, and secure practices in line with Greater Wellington values.	
Rationale	Al offers transformative capabilities that can improve services, streamline processes, and deliver insights. However, it also presents risks such as bias, privacy concerns, and ethical implications. This policy seeks to strike a balance between leveraging Al for progress and mitigating potential harms.	
Policy Owner	Chief Technology Officer	
Responsibilities	ICT	
Application	This policy applies to all Greater Wellington employees, service providers and volunteers.	
Related Policy and Legislation	<ul> <li>Information Technology Security and Appropriate Use Policy 2021</li> <li>Information Management Policy 2020</li> <li>Te Tiriti Policy (draft due for release June 2025)</li> <li>Privacy Policy 2023</li> <li>Privacy Breach Response Guidance 2023</li> <li>Privacy Risk Management Guidelines 2023</li> <li>Code of Conduct 2015</li> <li>Office of Privacy Commissioner Al Guidance – 2023</li> <li>Public Service Responsible Al Guidance - 2025</li> <li>Privacy Act 2020</li> <li>Human Rights Act 1993</li> <li>Copyright Act 1994</li> <li>New Zealand Bill of Rights Act 1990</li> <li>Public Records Act 2005</li> </ul>	
Effective Date	12 April 2025	
Review Date	12 April 2026 - one year subsequent to the policy's approval.	

Approved:	11 April 2025 Date:
Chief Executive	



Greater Well	lington Artificial Intelligence (AI) Policy
Purpose and Principles	Greater Wellington (GW) will ensure the responsible use of AI by promoting transparency, managing risks, and safeguarding data privacy.
	Our policy aims to empower staff with AI tools while maintaining ethical standards, legal compliance, and the integrity of our information systems.
	We will ensure that Greater Wellington Information including matauranga Māori / data is protected and managed while using AI.
	We will actively monitor AI usage, provide necessary learning and development, and include AI in ICT governance to mitigate risks and ensure the correctness of AI outputs.
	This approach will foster trust in AI technologies and encourage their appropriate, effective and secure use within the organisation.
Policies	Under this policy, all GW Employees and Service Providers are required to:
	1. Participate in learning and development and follow guidelines for AI use.
	2. Understand, manage and mitigate risks before using AI.
	3. Use <b>GW Approved Al Tools</b> where suitable and available
	4. Ensure transparency in the use of AI tools.
	5. Safeguard and protect Greater Wellington Information.
	6. Comply with legal and regulatory requirements related to Al.
	7. Verify the accuracy and fairness of Al-generated outputs.
	8. Consider the <b>environmental impact</b> of Al
	9. <b>Report and respond swiftly</b> to Al-related incidents and breaches.
Guidelines	Links to:
	<ul> <li>Greater Wellington Artificial Intelligence Usage Guidelines</li> <li>ICT Self Service Portal / Al Assessment</li> </ul>
	GW Applications Catalogue / Al Tools
Definitions	Al Tools – refers primarily to Generative AI - artificial intelligence systems designed to create new content, such as text, images, audio, or video, based on learned patterns from existing data. More generally refers to any solution, application or service that employs Artificial Intelligence approaches, concepts or technologies.
	<b>Greater Wellington Approved AI Tool</b> – AI Tool that has been reviewed under this Policy and for which appropriate risk mitigation and data protection measures are in place.



**Public AI Tool** – AI Tool available for public use on the web that is not constrained by an agreement with Greater Wellington around the reuse of submitted data and information.

**Personal Information** – any data or information which tells you something about a specific living individual, including details that could identify someone, either on its own or when combined with other information.

Greater Wellington Information – any data or information owned by Greater Wellington or for which GW has a contracted or agreed management or stewardship role (e.g. mātauranga Māori / data, copyrighted material and/or commercially sensitive information).

**Greater Wellington Identity** – login credentials employing your Greater Wellington email address and/or other ICT approved GW authentication method.

**Greater Wellington Employee** includes, but is not limited to: permanent employee, fixed term employee, casual employee, contractor on the Greater Wellington payroll or intern.

**Service Provider** means an organisation or person that works with or for Greater Wellington (including contractors and consultants).

Office of Privacy Commissioner Al Guidance – "The Office of the Privacy Commissioner's Guidance on Artificial Intelligence and the Information Privacy Principles" (September 2023)

**Public Service Responsible AI Guidance** – "Responsible AI Guidance for the Public Service: GenAI | NZ Digital government", released by the Digitising Government Minister on 3 February 2025.





Greater Wellington AI Usage Guidelines		
Participate in learning and development and follow guidelines for Al usage	<ul> <li>Complete Al training or other Al learning and development when offered.</li> <li>Follow Greater Wellington Procurement Guidelines for Al Tool license, subscription or other costs.</li> <li>Complete appropriate due diligence for Al tools to understand the provider of the service, their data use and privacy policies.</li> </ul>	
Understand, manage and mitigate risks associated with using AI Tools	<ul> <li>Before commencing use of a new Al Tool complete an Al Assessment to advise your intention and identify risks around bias, ethical, accuracy and data reuse.</li> <li>A Security Risk Assessment may be required to identify and mitigate technology risks.</li> <li>A Privacy Threshold Assessment may be required to identify and assess Privacy risks.</li> </ul>	
Use GW Approved AI Tools where suitable and available	<ul> <li>Use an existing Greater Wellington Approved AI Tool if one is available that meets your requirement. All approved GW AI Tools are listed in the ICT Applications Catalogue.</li> <li>Use your GW Identity when authenticating into Greater Wellington Approved AI Tools. This will assist with any subsequent disclosure requests and allow GW to put in place safety measures for Greater Wellington Information.</li> </ul>	
Ensure transparency in the use of AI Tools	<ul> <li>To maintain public and internal trust and accountability, ensure that use of AI Tools is disclosed.</li> <li>Be prepared to provide information about your AI use if needed. Consider the level of risk and any legal or contractual obligations when determining what details to document.</li> <li>Consider your context and audience when deciding how you should disclose your use of AI Tools.</li> <li>Consult with the GW Communications team for advice before using AI generated content in any external communications including to stakeholders or the public.</li> </ul>	
Safeguard and protect Greater Wellington information.	Keep Greater Wellington Information within GW.  When using a Public AI Tool do not submit:  Your or anyone else's Personal Information Confidential or commercially sensitive information Greater Wellington Information (as defined above)	



	When using a <b>Greater Wellington Approved Al Tool</b> :
	Anonymise or aggregate Personal Information to protect identification of individuals.
	Consult with data and information owners before using their data and information. Consultation is essential to identify and address any concerns around appropriate data management within the GW Information Management Policy guidelines and considering the GW Te Tiriti Policy. This might include data sharing agreements or Māori data sovereignty concerns, for example.
Comply with legal and regulatory requirements relating to AI.	Use AI tools ethically, avoiding any actions that could lead to unethical, inappropriate, or illegal outcomes.
	Do not submit any copyrighted information to Al tools.
	Ensure that any intellectual property within Al generated content is licensed for its intended use.
	Consider your responsibilities under the Greater Wellington Code of Conduct when using AI Tools.
Verify the accuracy and fairness of Algenerated outputs.	Before publishing or making decisions based on AI generated content, be aware that AI Tools may provide misleading, biased or inaccurate outputs.
	Proof read the Al generated copy in full.
	Fact check generated information with other sources. References and sources need to be available on request.
	Be aware of potential bias in Al Tool outputs. Bias may perpetuate stereotypical or unfair treatment related to race, sex and gender, ethnicity, or other protected characteristics.
Consider the environmental impact of using Al Tools	Al has a significant environmental impact, mainly due to the energy consumption required for training and running Al models.
	Consider the benefits of potential productivity and/or efficiency gains of using AI tools.
Report and respond swiftly to Al-related incidents and breaches.	Use the existing Privacy Incident or ICT Incident reporting procedures to report any AI related incidents as soon as you become aware of them.
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