



Policy GP-30 Use of Artificial Intelligence

Governance Policy GP-30	Section: Administration
Issue Date: June 18, 2025	Approval Date: October 28, 2025
Review Date: September 2026	Initiating Department: CAO

Purpose:

Norfolk County is committed to the responsible, ethical, and transparent adoption of Artificial Intelligence (AI) to serve the public good and modernize service delivery. This policy establishes governance principles for AI use in municipal operations, ensuring compliance with Bill 194, Ontario’s provincial AI guidelines, and federal AI frameworks.

Scope

This Artificial Intelligence Policy applies to all County employees, members of council, members of local boards and committees and any third-party contract companies. This policy applies to all AI systems used, procured, or developed by Norfolk County in municipal services, decision-making processes, and operations. It covers AI applications affecting residents, businesses, and employees, including automated decision-making, predictive analytics, and AI-assisted service delivery.

Definitions

Artificial Intelligence (AI): The simulation of human intelligence in machines that are programmed to think and act like humans.

Generative AI: Artificial Intelligence that generates new, original digital content from text to images, music, and more by learning from existing data.

Predictive AI: Artificial intelligence that helps organizations prepare for the future, and make informed decisions by anticipating outcomes based on data-driven insights.

Bias: Consistently flawed output that is affected by flaws in the design of the AI technology or training data, to either misidentify certain types of subjects, or ascribe them with characteristics that disadvantage them based on illegitimate grounds.

Data: Any information collected and stored, whether locally or by a third party, which is used by the AI technology for the purpose of training, validation, testing, or generating

Policy GP-30

output.

Data centers: Facility equipped with a vast amount of computing resources specifically designed for AI workloads.

Personal information: Personally Identifiable information (PII) this includes but it not limited to full government names, home addresses, phone numbers, email addresses, social security numbers, and driver's license numbers. Financial details, health records, and any information subject to privacy laws or protections.

Low-risk: The use of AI for tasks that do not directly affect employee performance or safety.

High-risk: If an AI system is used in a specific area (sector) for a specific use case and the use of the AI system poses a significant risk of adversely affecting health, safety or fundamental rights of natural persons.

Standards and Procedures

This Artificial Intelligence Policy shall be subject to the following review process;

- Senior Leadership Team
- Council
- Director of IT
- The County Clerk and Deputy Clerk

This Policy mandates the use of Copilot to continue to be used as well as the use of ChatGPT and Claude through a Norfolk County provided account at the request of staff and at the discretion of the Director of IT. The addition of any AI system to this policy and the County is at the discretion of the director of IT. All Artificial Intelligence software must undergo a thorough review from the IT department prior to its adoption by the County.

The use of Artificial Intelligence is not solely for the use of assistance with daily work. At the discretion of the director of IT, AI based programs to protect the corporation from phishing and increase cyber security will be used.

All staff and council members are required to include a disclaimer on their work, email, content, etc. when Artificial Intelligence has been used. See attachment 2 for County approved disclaimers.

Policy GP-30

Responsibilities

All employees shall

- a) Read, understand, and comply with this policy.
- b) Use Artificial Intelligence in a responsible, transparent, and ethical manner.
- c) Not input any personal, confidential, in camera information or information relating to municipal elections into any Artificial Intelligence tools.
- d) Thoroughly review all content they create using generative and predictive AI tools to ensure the content is truthful and accurate.
- e) Fact check all content created by generative and predictive AI tools.
- f) Not use County provided Artificial Intelligence resources for non-work-related purposes.
- g) Notify the department head if they deem that an employee or councillor is using Artificial Intelligence in a manner that is
 - a) For non-work-related matters
 - b) Contrary to security procedures; or
 - c) Contrary to this policy

All Council Members

- a) Read, understand, and comply with this policy.
- b) Use Artificial Intelligence in a responsible, transparent, and ethical manner.
- c) No input any personal, confidential, in camera information or information relating to municipal elections into any Artificial Intelligence tools.
- d) Thoroughly review all content they create using generative and predictive AI tools to ensure the content is truthful and accurate.
- e) Fact check all content created by generative and predictive AI tools.
- f) Not use County provided Artificial Intelligence resources for non-work related purposes.

Policy GP-30

- g) Not use County provided Artificial Intelligence resources for any form of campaigning.
- h) Notify the CAO if they deem that an employee or councillor is using Artificial Intelligence in a manner that is;
 - a) For non-work-related matters;
 - b) Contrary to security procedures; or
 - c) Contrary to this policy.

Department heads and supervisors shall

- a) Ensure that employees under their supervision comply with this policy;
- b) Use Artificial Intelligence in a responsible, transparent, and ethical manner;
- c) Not input any personal, confidential, in camera information or information relating to municipal elections into any Artificial Intelligence tools;
- d) Thoroughly review all content they create using generative and predictive AI tools to ensure the content is truthful and accurate;
- e) Assess risk within their specific departments and review annually;
- f) Fact check all content created by generative and predictive AI tools;
- g) Notify the CAO or the Director of Human Resources if they deem that an employee or councillor is using Artificial Intelligence in a manner that is;
 - a) For non-work-related matters;
 - b) Contrary to security procedures; or
 - c) Contrary to this policy.

The IT department shall

- a) Review software used for Artificial Intelligence on an annual basis to ensure the County is utilizing its capabilities effectively.

The Clerk's department shall

- a) Retain authority to make authoritative changes to this policy based on legislation or at the discretion of the CAO.

Policy GP-30

- b) Monitor and report on this policy.
- c) Monitor legislative changes at the provincial and federal level and reflect these changes throughout this policy when necessary.

Guiding Principles

- a) Transparency
 - Artificial Intelligence systems must be transparent, with clear documentation on functionality, purpose, and logic.
 - Norfolk must disclose when AI has been used in decision-making or content creation.
 - Residents and staff should be notified when interacting with AI.
- b) Accountability & Oversight
 - Artificial Intelligence systems must have human oversight to ensure ethical outcomes and mitigate unintended consequences.
 - Departments retain full responsibility for decisions and impacts on individuals and communities, even those aided by AI.
- c) Fairness & Bias Mitigation
 - Artificial Intelligence systems must be tested and monitored to prevent bias, discrimination, and inequitable outcomes.
 - Artificial Intelligence models must be regularly audited to assess fairness and mitigate algorithmic bias.
- d) Privacy & Data Protection
 - Artificial intelligence must comply with privacy laws, including the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and Federal Privacy Regulations.
 - Data used in Artificial Intelligence applications must be collected, stored, and processed with stringent security measures.
 - Personal information in relation to staff, Council and members of the public shall not be entered into a generative artificial intelligence tool or

Policy GP-30

service unless a contract is in place with the supplier and covers how the information will be used and protected.

- Any generated content with the use of AI including AI original prompts are transitory records and are not stored.
- All personal information used by, created or obtained through, and disclosed for the use of artificial intelligence by the County is subject to the requirements of the Privacy Act and related policy instruments. This means that:
 - a) Personal information can only be collected if it is directly related to the program or activity.
 - b) It may only be used for the purpose for which it was collected for or a use consistent with that purpose
 - c) The County must be transparency about how they treat and safeguard the personal information they collect once it is under the control of the County.

e) Security & Risk Management

- Artificial intelligence must undergo risk assessments to identify and mitigate cybersecurity threats prior to the deployment of all new AI tools.
- Norfolk County will adopt best practices for Artificial Intelligence security to prevent misuse, unauthorized access, and system vulnerabilities.

f) Mandatory Training

- Norfolk County will prioritize staff training to build AI fluency across all departments. Low-risk AI uses will be actively encouraged in alignment with federal guidelines.
- All staff and councillors will take part in mandatory AI training upon the roll out of the use of Artificial Intelligence and mandatory refresher training at the discretion of the Deputy Clerk, the Clerk, and the Director of IT.

g) Environmental Awareness Clause

- Staff should be aware that the use of Artificial Intelligence tools relies on third-party data centres, which may require significant energy and water usage for its operations, resulting in indirect environmental impacts such as greenhouse gas (GHG) emissions.

Policy GP-30

h) Monitoring, Grievance & Review

- Artificial Intelligence systems will be regularly reviewed for performance, fairness, and potential impacts.
- Policies and guidelines will be updated to reflect technological advancements and evolving regulations.
- Norfolk County will maintain mechanisms for reviewing AI-related grievances and correcting unjust outcomes.
- Residents and employees can challenge AI-generated outcomes and seek human review.

i) Policy review & Updates

- This policy will be reviewed annually or as required to ensure alignment with evolving legislative and technological landscapes.

j) Effective Date

- This policy comes into effect as of [DATE] and applies to all current and future Artificial Intelligence systems utilized by Norfolk County.

Communication

This policy will be available to all Council members and staff to ensure compliance with all relevant legislation, including provincial and federal legislation, and municipal by-laws.

This policy shall be provided to all Members of Council with each new term of council.

Legislative Reporting Requirements

This Artificial Intelligence Policy remains in compliance with all relevant legislation, including but not limited to:

- Bill 194, Strengthening Cyber Security and Building Trust in the Public Sector Act, 2024.
- Ontario's Provincial Guidelines: Responsible Use of Artificial Intelligence Directive.
- Ontario's Provincial Guidelines: Ontario's Trustworthy Artificial Intelligence (AI) Framework.

Policy GP-30

- Federal Artificial Intelligence Frameworks: Responsible Use of Artificial Intelligence in Government
- Municipal Act
- Personal Health and Information Protection Act
- Privacy Act