

WHC Artificial Intelligence (AI) Policy

July 2026

1.0 Purpose

This Policy sets out WHC's requirements for the responsible, secure, ethical and lawful use of Artificial Intelligence (AI), including generative AI, to improve service delivery while protecting privacy, confidentiality, safety, fairness and human accountability.

2.0 Scope

This Policy applies to all WHC employees, contractors, consultants, volunteers and Board Directors, and to all AI technologies used for WHC business purposes, including information processed, created, analysed or managed using AI.

3.0 Policy Requirements

3.1. Approved Use of AI

WHC staff may only use organisation-approved AI tools. WHC's licensed Microsoft Copilot is the approved AI platform for work-related activities unless otherwise authorised by the Executive.

AI may be used to draft documents, correspondence, reports, presentations and meeting notes, generate ideas, summaries and research assistance, improve productivity, and support analysis and content development.

All AI-generated content must be reviewed, verified and approved by the responsible staff member before use or distribution.

3.2. Human Oversight and Accountability

AI is a support tool and must not replace professional judgement. Staff remain accountable for all work products, recommendations and decisions involving AI.

WHC staff must not make decisions solely based on AI where those decisions affect housing applications or allocations, tenancy management, client support services, risk assessments, employment matters, disciplinary actions or any matter requiring professional judgement.

Appropriate human review and approval must occur before any significant decision is made.

3.3. Privacy and Confidentiality

WHC must protect the privacy and confidentiality of tenants, applicants, staff, contractors and stakeholders when using AI. Staff must not enter personal, health, financial, sensitive, confidential or commercially sensitive information into public or unapproved AI systems. Information may only be entered into approved AI platforms where appropriate security, privacy and access controls are in place.

All use of AI must comply with applicable privacy legislation and WHC policies.

3.4. Fairness, Safety and Ethical Use

AI must be used in ways that protect safety, dignity and wellbeing, support fair and equitable outcomes, avoid discrimination, bias or disadvantage, respect vulnerable individuals and communities, and align with WHC's mission and values. Care must be taken when supporting women and children experiencing domestic and family violence or other vulnerable circumstances.

Staff must immediately report concerns regarding biased, harmful or inappropriate AI inputs or outputs to their manager.

3.5. Transparency

Where AI has significantly contributed to a document, report or other business output, staff must disclose its use where appropriate using the statement: "This document has been drafted with AI assistance and reviewed by WHC staff." WHC retains responsibility for all AI-assisted work products.

3.6. Information Security

All AI technologies used within WHC must comply with organisational cybersecurity, information management and ICT requirements. Staff must not use unapproved AI platforms for work purposes, circumvent security controls, upload confidential information to unauthorised systems or use AI in a way that creates cybersecurity, privacy or regulatory risks.

Suspected incidents or breaches must be reported in accordance with WHC incident management procedures.

3.7. Prohibited Use

Prohibited uses include:

- entering customer and personal, health, financial or sensitive information into public AI tools;
- making decisions solely based on AI outputs;
- using AI to discriminate or disadvantage individuals or groups;
- creating misleading, deceptive, offensive, defamatory or inappropriate content;
- uploading confidential or commercially sensitive information into unapproved systems;
- using AI for unlawful, unethical or unauthorised purposes; or relying on AI-generated information without verification.

4.0 Roles and Responsibilities

All staff must follow this Policy, use only approved AI tools, verify AI outputs, protect privacy and confidentiality, report AI-related risks or incidents, and complete required training.

Managers must support compliance, monitor appropriate AI use and address non-compliance. The Technology Manager provides guidance on approved tools, supports secure AI use, delivers awareness and training, and maintains this, Policy.

The Executive Team monitors compliance manages organisational AI risks and reports significant risks to the Board.

The Board oversees AI governance through WHC's risk management and compliance framework.

5.0 Compliance and Breaches

All persons covered by this Policy must comply with its requirements. WHC may monitor and review AI use to ensure compliance with legal, regulatory and organisational obligations. Breaches may result in corrective action, disciplinary action or termination of employment or engagement, depending on the nature and severity of the breach.

6.0 Review

This Policy will be reviewed at least yearly, or earlier where significant technological, legislative, regulatory, risk or operational changes require review.

7.0 Related Legislation and Documents

This Policy should be read with applicable legislation and WHC policies:

- Privacy and Personal Information Protection Act 1998 (NSW),
- Health Records and Information Privacy Act 2002 (NSW),
- State Records Act 1998 (NSW),
- Government Information (Public Access) Act 2009 (NSW),
- Work Health and Safety Act 2011 (NSW),
- Community Housing Providers (Adoption of National Law) Act 2012 (NSW),
- Australian Government AI Ethics Principles,
- WHC Privacy Policy,
- WHC Code of Conduct.