Artificial Intelligence

Policy

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1. Policy Statement

Artificial intelligence (AI) is technology that enables computers and machines to simulate human intelligence and problem-solving capabilities. On its own, or combined with other technologies (e.g., sensors, geolocation, robotics), AI can perform tasks that would otherwise require human intelligence or intervention. Digital assistants, GPS guidance, autonomous vehicles, and generative AI tools (like Microsoft Copilot and Chat GPT) are just a few examples of AI in the daily news and our daily lives.

Greater Manchester Police (GMP) is aware of the opportunities for innovation and efficiency offered by AI models and tools. Where GMP intends to incorporate AI into its operations, this needs to be done in a safe, ethical, and legally compliant manner. GMP is committed to leveraging AI to drive innovation, enhance operational efficiency, deliver improved services, and drive cashable efficiencies. In alignment with the UK government's AI Opportunities Action Plan, the force aims to:

- **Promote Ethical AI Use:** Ensure that AI technologies are developed and deployed responsibly, adhering to ethical standards and safeguarding privacy and security.
- **Enhance Public Services:** Utilise AI to improve the quality and accessibility of public services, making them more efficient and user-friendly.
- **Encourage Innovation:** Create an environment that encourages innovation and collaboration.
- **Ensure Inclusivity:** Strive for inclusivity in AI development and deployment, ensuring that the benefits of AI are accessible to all segments of society.

The organisation has authorised use of Microsoft Copilot subject to the controls contained within this policy. Further conditions and controls on its use are listed below. Other AI tools, including chatbots (e.g., ChatGPT), AI search engines, content creation tools, grammar checkers (e.g., Grammarly), and large language models such as Deepseek, Gemini, and Perplexity, are not approved for use at this time. This list is not exhaustive, as new AI tools are released regularly. If there is a business need for an alternative AI tool, it can be submitted through the internal approval process for evaluation.

Until approval is granted, these tools must not be used in any capacity. Once approved, new AI tools must have a comprehensive acceptable use policy tailored to their use. This is to be owned by the nominated Senior Responsible Officer for the tool.

Access to unauthorised AI tools will be monitored and blocked where possible.

1.1 Aims

This document outlines the framework that applies to the acceptable use of GMP's Microsoft Copilot. Its purpose is to ensure that GMP data is not intentionally or inadvertently transmitted to such platforms or related third parties in breach of data protection controls to which GMP must adhere.

1.2 Microsoft Copilot services that can and cannot be used

Microsoft Copilot refers to a series of evolving capabilities, products, and services built by Microsoft that leverage Artificial Intelligence (AI), Machine Learning (ML), and Large Language Models (LLMs). Microsoft Copilot capabilities have been introduced throughout Microsoft 365 and Windows. Crucially, Microsoft Copilot does not just refer to one singular product or service and is instead a common brand used across several distinct services.

The table below details the Microsoft Copilot services that **can** be used:

Copilot Feature (Permitted)	Description
Microsoft 365 Copilot Chat	When accessed via a GMP device and signed into either the browser or O365 platform with an integration, the user has access to GMP's secured and isolated Copilot instance. The web-based Microsoft Copilot provides AI assistance through a browser interface. This standalone offering shares a name with the overarching Microsoft Copilot brand and concept. All interactions stay within GMP. NOTE: using Copilot without a GMP device, or not signed in using a GMP account, does not fall under this approval. Only when signed in is Copilot then using GMP's secured instance. Users can navigate to co-pilot via Teams, or via the Copilot icon in the top right of a screen, ensuring the green shield is present which indicates secure use of Copilot.

The table below details the Copilot services that exist but must not be used by GMP officers and staff:

Copilot Feature (Prohibited)	Description

Microsoft Visual Studio – Github Copilot	GitHub Copilot is an AI-powered code completion tool that assists developers by suggesting visual studio code snippets and entire functions.
Microsoft Copilot (consumer version)	Microsoft 365 Copilot integrates AI capabilities into Microsoft 365 applications like Word, Excel, PowerPoint, Outlook, and Teams to enhance productivity through features like automated content generation, data analysis, and email management. This is available for consumers only and is not authorised to be used within policing.
Copilot Pro	Copilot Pro offers enhanced AI capabilities, including faster performance and additional features for productivity and creativity. This is available for consumers only and is not authorised to be used within policing.
Copilot for Service Copilot for Sales Copilot+ PCs	These Copilot features apply to specific Microsoft systems that are not used by GMP.
Microsoft Edge - Visual Search	An AI feature of Microsoft Edge which allows users to search for images on the web. Due to security reasons this feature must not be used.
Microsoft Edge - Compose	An AI feature of Microsoft Edge which provides AI-powered writing assistance, helping users create and refine text. Due to security reasons this feature must not be used.
Microsoft Edge - Context Sharing	An AI feature of Microsoft Edge which enables Copilot to access the content of web pages to provide context-aware assistance. Due to security reasons this feature must not be used.

1.3 What to consider when using AI

The use of AI within UK policing is an emerging and rapidly evolving area. These technologies offer clear potential benefits across a range of operational and administrative functions. It is expected that officers and staff from all ranks and departments will begin to explore their use. However, the adoption of AI must be approached with some caution. There are real and foreseeable risks that could significantly impact individuals, operational integrity, and public confidence in policing. Therefore, all use of AI must be lawful, transparent, explainable, responsible, accountable, and robust. All use of AI must comply with the NPCC's AI Principles, the Code of Ethics, and relevant legislation including the Data Protection Act 2018.

Core Principles for AI Use

Use responsibly and ethically:

- Ensure AI use is in line with the force's values, code of ethics and data protection laws.
- Ensure AI use is necessary and proportionate.
- AI should support - not replace - professional judgment, especially in sensitive contexts.

Protect confidentiality and personal data:

- Do not input personal, sensitive, or operationally classified data unless explicitly authorised or operationally justified.
- Follow GMP data protection and information security policies.
- All outputs generated by AI tools used in official documentation must be stored in accordance with MOPI and the GMP data retention policies.

Verify and validate outputs:

- AI-generated content is not guaranteed to be accurate. It is a mandatory requirement that where AI is used to support officers and staff, that they must always review and validate outputs before use in any operational or public-facing context.
- You are responsible for the accuracy and appropriateness of any AI-generated content.
- Do not base decision making solely on the output of an AI query or response; it is your responsibility. AI-assisted analysis does not replace PACE-compliant decision-making. Where AI materially influences investigative decisions, this must be:
    - documented
    - reviewable
    - subject to disclosure consideration

Maintain transparency:

- Do not present AI-generated work as your own. Although there is no need to declare every use of AI, such as for note taking, drafting work you heavily edit or for research, transparency is essential to maintain public trust. You must always declare the use of AI in any formal report, creative content or when it is used in decision making.
- Declare AI use in formal reports, decision-making, or public documents, either in the body of the document or in a footnote. Use the text *"Microsoft Copilot supported the creation of this document"* or "*This document contains content generated by Artificial Intelligence (AI). AI generated content has been reviewed by the author for accuracy and edited/revised where necessary. The author takes responsibility for this content."*

Avoid bias and harm:

- Be alert to potential bias, stereotyping, or inappropriate content.
- Report any concerning outputs to your supervisor or the [REDACTED].
- Certain activities present an elevated risk of bias, discrimination, or legal challenge and require particular caution. These include, but are not limited to:
    - Recruitment & HR activities, including job advertisements, role profiles, assessment materials, interview questions, scoring frameworks or selection criteria.
    - Employment-related decision making or documentation.

  AI tools must not be used to make or inform employment decisions and should only be used in HR or recruitment contexts where explicitly authorised and supported by appropriate governance and safeguards.

Stay within intended use cases:

- Use AI for appropriate tasks such as drafting, summarising, or research support.

- Do not use AI for legal interpretation, risk assessments, or direct public communication without review.
- Do not use AI tools to make or help you make employment decisions about applicants or employees, including recruitment, hiring, retention, promotions, transfers, performance monitoring, discipline, demotion, or terminations.

Maintain professional standards:

- Use Copilot in a way that upholds the integrity and professionalism expected in GMP
- Avoid generating content that could damage public trust or confidence.

AI may be used to assist understanding, summarisation, or organisation of information, but must not be used to shape investigative direction, determine lines of enquiry, assess evidential strength, or construct cases for criminal or misconduct proceedings.

1.4 Using Microsoft Copilot chat

GMP's Microsoft Copilot Chat is authorised for use with information classified as OFFICIAL and OFFICIAL-SENSITIVE, including personal and policing data, provided it is used in accordance with the guidance and exceptions outlined in this document. Where the use case is outside of the guidance and involves processing personal data that constitutes sensitive or high-risk processing please contact the Information Governance Unit [REDACTED] for guidance.

Microsoft Copilot is intended for use in the following types of activities:

Productivity and Support

- Drafting emails, reports, and meeting notes.
- Summarising documents or transcripts.
- Improving clarity and tone of writing.
- Creating templates, checklists, or standard replies.

Data and Analysis

- Explaining data trends or summaries.
- Generating charts or visual summaries (with Excel/Power BI).
- Assisting with basic calculations or data interpretation.

Knowledge and Research

- Answering questions based on policies or public information.
- Summarising legislation or guidance (non-legal).
- Providing overviews of complex topics.

Idea Generation and Planning

- Generating ideas for campaigns or strategies.
- Drafting vision statements or objectives.
- Structuring presentations or briefings.

The examples of permitted uses listed in this policy are illustrative and not exhaustive. Where a proposed use of AI is not clearly aligned to the permitted purposes set out in this policy, it must not be used without prior approval through the internal approval process.

1.5 Where Microsoft Copilot cannot be used

Prohibited Information Types

To mitigate data transfer risks and protect sensitive operations, under no circumstances should the following types of information be entered, pasted, uploaded, or otherwise submitted into Copilot:

Information classified above OFFICIAL-SENSITIVE

- AI must not be used for any data marked or implicitly classified as SECRET or TOP SECRET.

[CONTENT REDACTED FOR EXTERNAL PUBLICATION]

- [CONTENT REDACTED FOR EXTERNAL PUBLICATION]

Information Subject to Specific Handling Caveats. This includes, but is not limited to:

- [CONTENT REDACTED FOR EXTERNAL PUBLICATION]
- Information designated under specific international agreements with handling restrictions.
- Legally privileged information.
- [CONTENT REDACTED FOR EXTERNAL PUBLICATION]
- System Credentials. Passwords, API keys, private certificates, or any other system access credentials. Discussing general system configurations, non-critical vulnerabilities for analysis, or network architecture concepts is permitted if this is necessary for GMP digital services work.

Evidential Material Restrictions

Generative AI is not authorised for use in the Criminal Justice system for the creation of evidential materials. This means it must not be used in the preparation of witness statements, MG forms, or any other evidential reports (grammar/spelling checks can be conducted with MS Word).

However, AI may be used to support investigators in understanding evidence or assisting with the investigative process, provided it is not involved in the generation of any official evidential documentation.

1.6 Key risks of using Microsoft Copilot chat

There are a number of risks that users of Microsoft Copilot chat should be aware of when using it to support them in their professional roles:

Bias and stereotyping

- Copilot may reflect societal biases found in its training data.
- It could unintentionally reinforce stereotypes (e.g., gender, race, profession).
- Mitigations are in place, but not all harmful content can be fully prevented.

Overrepresentation or underrepresentation

- Some groups may be over- or under-represented in responses.
- Legitimate content (e.g., LGBTQIA+ topics) may be filtered or misrepresented.
- Microsoft uses classifiers and prompt adjustments to reduce this risk.

Inappropriate or offensive content

- Copilot might generate content that is offensive, controversial, or inappropriate. This includes images, text, or audio that may contain harmful symbols or themes.
- Safeguards are in place, but some content may still slip through.

Information reliability

- Copilot can produce inaccurate or misleading information.
- Many AI tools are prone to “hallucinations,” false answers or information, or information that is stale, and therefore responses must always be carefully verified by a person.
- Users should always verify important information before acting on it.

Multilingual performance

- Copilot performs best in English.
- Other languages may have reduced accuracy or fluency.
- Improvements are ongoing to address this.

Audio input limitations

- Voice input may be affected by noise, accents, or unclear speech.
- Copilot Voice does not support web searches, limiting real-time updates.

Internet dependence

- Copilot requires a stable internet connection.
- Connectivity issues can affect performance or availability.

1.7 Use of AI tools with other systems

- The introduction or use of any AI tools within GMP systems, whether internally hosted, cloud-based, or managed by third-party providers, must be authorised by GMP’s ITDD branch prior to use. This includes connecting, deploying, embedding, integrating or any other sort of use within force IT systems. All proposed AI tools must undergo an assessment using the NPCC Responsible AI Checklist for Policing (tailored where appropriate) before deployment. This requirement applies to tools used by internal staff, contractors, third parties, or vendors. The checklist is available from the ITDD Branch upon request. The [CONTENT REDACTED FOR EXTERNAL PUBLICATION], retains sole authority to approve the use of AI tools within GMP environments.

1.8 Governance, reporting and support

To be compliant with the Data Protection Act where processing personal data that constitutes sensitive or high risk processing please contact the Information Governance Unit [REDACTED] - Website [REDACTED]

[CONTENT REDACTED FOR EXTERNAL PUBLICATION]

[CONTENT REDACTED FOR EXTERNAL PUBLICATION]

[CONTENT REDACTED INTERNAL CONTACT] will oversee and monitor the reporting of security breaches and compliance with the requirement to read the policies mentioned above.

If you encounter any issues, breaches, or inaccuracies, report them immediately to your supervisor or contact: [REDACTED INTERNAL CONTACT].

Failure to comply with this policy may lead to a breach in system or information security and may lead to disciplinary action. Any suggestion that an individual is in breach of the standards required will be thoroughly investigated and they may be liable to disciplinary action. Criminal and/or disciplinary action will be taken against any user who wilfully misuses systems made accessible to them by GMP.

2. Scope

All police officers and police staff, and those working voluntarily or under contract to GMP must be aware of, and are required to comply with, all relevant policy and associated procedures.

This policy applies to all users who access GMP information using any GMP system or device belonging to or leased by GMP.

3. Terms and Definitions

Anthropomorphism: The tendency for people to attribute humanlike qualities or characteristics to an AI chatbot. For example, you may assume it is kind or cruel based on its answers, even though it is not capable of having emotions, or you may believe the AI is sentient because it is very good at mimicking human language.

Bias: A type of error that can occur in a large language model if its output is skewed by the model's training data. For example, a model may associate specific traits or professions with a certain race or gender, leading to inaccurate predictions and offensive responses.

Emergent behaviour: Unexpected or unintended abilities in a large language model, enabled by the model's learning patterns and rules from its training data. For example, models that are trained on programming and coding sites can write new code. Other examples include creative abilities like composing poetry, music and fictional stories.

Generative AI: Technology that creates content - including text, images, video, and computer code - by identifying patterns in large quantities of training data and then creating original material that has similar characteristics.

Grounded AI: In generative AI, grounding is the ability to connect model output to verifiable sources of information (such as GMP policies, College of Policing policy and similar sources). If you provide models with access to specific data sources, then grounding tethers their output to these data and reduces the chances of inventing content associated with OpenAI models.

Hallucination: A well-known phenomenon in large language models, in which the system provides an answer that is factually incorrect, irrelevant or nonsensical, because of limitations in its training data and architecture.

Large language model: A type of neural network that learns skills - including generating prose, conducting conversations, and writing computer code - by analysing vast amounts of text from across the internet. The basic function is to predict the next word in a sequence, but these models have surprised experts by learning new abilities.

Natural language processing: Techniques used by large language models to understand and generate human language, including text classification and sentiment analysis. These methods often use a combination of machine learning algorithms, statistical models and linguistic rules.

Neural network: A mathematical system, modelled on the human brain, that learns skills by finding statistical patterns in data. It consists of layers of artificial neurons: The first layer receives the input data, and the last layer outputs the results. Even the experts who create neural networks do not always understand what happens in-between.

Parameters: Numerical values that define a large language model's structure and behaviour, like clues that help it guess what words come next. Systems like GPT-4 are thought to have hundreds of billions of parameters.

Reinforcement learning: A technique that teaches an AI model to find the best result by trial and error, receiving rewards or punishments from an algorithm based on its results. This system can be enhanced by humans giving feedback on its performance, in the form of ratings, corrections and suggestions.

Transformer model: A neural network architecture useful for understanding language that does not have to analyse words one at a time but can look at an entire sentence at once. This was an AI breakthrough, because it enabled models to understand context and long-term dependencies in language. Transformers use a technique called self-attention, which allows the model to focus on the particular words that are important in understanding the meaning of a sentence.

4. Associated Documents

AI Opportunities Action Plan
ICO Guidance - AI tools
AI and cyber security: what you need to know - NCSC.GOV.UK
NPCC Artificial Intelligence Strategy
[CONTENT REDACTED FOR EXTERNAL PUBLICATION]

5. Statutory Compliance & Consultation

5.1 Statutory Compliance

5.1.1 Equality Act (2010)

An Equality Impact Assessment has been completed for this policy and can be found **here**.

Date of SCT meeting where Chief Officers reviewed the EIA	29th January 2025
Summary of Chief Officer discussions/considerations at SCT	Approved.

State below whether Chief Officers agreed with the EIA, or selected a different outcome:

Outcome	EIA recommended	Chief Officer Decision
Approve – no changes. The policy is robust, and the evidence shows no potential for discrimination. All appropriate opportunities to advance equality and foster good relations between groups have been taken.	x	x
Approve – subject to amends. Changes are required to remove barriers, better advance equality or mitigate potential effects. This should be done before the policy is implemented.		
Approve – continue with policy. Despite any adverse effect or missed opportunities to advance equality, provided that it does not unlawfully discriminate. The objective justification must be recorded.		

Reject – stop the policy. If there are adverse effects that are not justified and cannot be mitigated, or any unlawful discrimination.		

5.1.2 The UK General Data Protection Regulation (UK GDPR) and Data Protection Act (2018)

Greater Manchester Police has a duty to ensure, as far as is possible, that all staff comply with the provisions of the UK GDPR and the Data Protection Act 2018, particularly relating to their access to a wide variety of personal information.

This policy has been assessed for compliance issues by the Information Governance Unit (IGU). There are Data Protection compliance issues with the use of Artificial intelligence (AI), points 1.4 and 1.8 of this policy documents the requirement of being data protection compliant when processing personal data that constitutes sensitive or high-risk information. The policy should be read in conjunction with GMP's Data Protection Policy and guidance issued on the Intranet page - [REDACTED]

5.1.3 Freedom of Information Act (2000)

The Freedom of Information Act 2000 (FOIA) grants a general right of access to all types of recorded information held by public authorities. This document is classified as 'Official' the full policy and procedure is not disclosable under the FOI Act, sections of it are disclosable. Any requests for this policy under FOI, is to be assessed by the Information Access Team at [REDACTED] for disclosure, and the procedure owner would be consulted.

For further information on FOI, please contact [REDACTED]

5.2 Consultation

Trade unions, staff associations, staff support networks, districts, branches and subject matter experts have been given the opportunity to review this policy as part of the formal consultation process which was undertaken in March 2026. All feedback has been considered and incorporated where appropriate.