

AI Fair Usage Policy

Policy owner

Chief Digital and Information Officer

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v1.0

Policy contact

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Owning department

Information & Digital Services

Applicability

This policy is applicable to Volunteers, Staff, Contractors and Partners undertaking RNLI work or handling RNLI data.

This policy must be read alongside the RNLI Data & Information Governance Policy and Information Security Policy

Background of policy

This policy outlines the safe and responsible use of AI within the organisation, covering all branches of AI and making specific reference to assistive generative AI, predictive AI, embedded AI features, agents and co-pilots. There are many concepts used in the field of AI and you may find it useful to refer to a glossary of AI terms: [Data science and AI glossary | The Alan Turing Institute](#)

Policy**Introduction**

The Royal National Lifeboat Institution (RNLI) understands the potential of AI technology to enhance its operations, communications, interactions with the public and the part it could play in its decision-making ability. This usage policy outlines the guidelines and principles governing the use of AI technology for all RNLI staff and volunteers.

The policy establishes a framework that guides RNLI staff and volunteers in the proper use of AI technology, emphasising data security, privacy, and responsible generative AI practices. By adhering to this policy, the RNLI aims to leverage the capabilities of AI tools to enhance public safety, communication, and decision-making while upholding its core values and maintaining the trust of our supporters and communities.

Principles of Responsible AI Use**Compliance with Laws and Regulations**

AI systems must be used in compliance with all applicable laws, regulations and RNLI policies, including organisational data usage, data protection and information security.

Transparency and Accountability

All consumers (including but not limited to staff, volunteers, and those involved in RNLI events) of this policy must be transparent about the use of generative AI in their work, ensuring that any audience or consumers of data are aware of the technologies involvement in creation of content or a decision-making process. Consumers are responsible for the outcomes generated by AI systems and must be prepared to explain and justify those outcomes. All work published internally or externally that has generative AI-derived content must carry a disclaimer for transparency.

Data Privacy and Security

All consumers of this policy must adhere to the RNLI's data privacy and security policies when using AI systems. **RNLI data should NEVER be entered into an external generative AI system (e.g. Chat GPT), without prior written approval of Data Governance and Legal department.** When signed into your RNLI account and using Copilot, please note that you should still not enter the following types of data without seeking advice from Data Governance and Legal teams:

Commercially sensitive information of the RNLI or that has been shared with RNLI by any of its partners/ suppliers and is subject to a non-disclosure agreement or other legal restriction.

Personal data e.g. names, email address, or any data that identifies another person should not be entered into any AI system unless the Data Protection team has been consulted prior, with the exception of in-app services (e.g. where co-pilot is embedded in Outlook or Excel). NB AI should never be used to drive a personal level decision, such as recruitment shortlisting.

If for any reason any consumer of this policy would like to process personal data in an AI system, they should raise an AI ticket via IT Helpdesk and may then be required to submit a Data Protection Impact Assessment to the Data Governance Decision Board and Data Protection Officer. Only if written approval is given by both should any such information processing take place.

Human-AI Collaboration

All consumers of this policy are reminded to recognise the limitations of generative AI and always use their judgment when interpreting and acting on AI-generated recommendations. Generative AI results are influenced by the human inputs, prompts, and data used. Generative AI systems should be used as a tool to augment human productivity, not replace it. **Use of generative AI should always include a human-in-the-loop review**, including a validation of quoted sources of information.

Fairness and non-discrimination

All consumers of this policy are reminded to consider the potential for bias or discrimination when using AI. Sources of information in particular should be considered to ensure that any inherent bias in source data is not reflected in output. Users should try to assure that models are trained and tested on relevant, accurate, and generalisable datasets, and that users of such models are trained to implement them responsibly and without bias. Outputs should meet appropriate accessibility standards.

Environmental and reputational considerations



The RNLI is concerned to ensure the environment is considered in its use of AI. All consumers of this policy are reminded to recognise that AI, and in particular generative AI, consumes a large amount of energy to generate. Thought should be given to whether the efficiency gain expected justifies the environmental impact.

Risk awareness

The RNLI recognises that there is both opportunity and risk in the adoption of fast-paced technologies. Where an individual wishes to use AI capability not natively licensed by the RNLI (e.g. Microsoft embedded co-pilot) then a business case should be brought to Portfolio Management. The case should seek to quantify the potential benefit, and consideration should be given to the following risks:

- Low-cost models likely to be offered to test or educate AI that is early in its maturity lifecycle, and/or to create a reliance which later becomes chargeable
- Supplier ability to demonstrate and assure compliance with UK data protection and Intellectual Property Law (risk likely to be higher with non-European providers)
- The potential for reputational, ethic or discriminatory issues
- The quality of the data an AI model will consume (within or without the RNLI), keeping in mind that poor data quality remains a very strong driver of AI breaches and failure to deliver benefits and success is likely to depend on the quality of the data inputs provided
- Any potential shortfall in the level of knowledge and skill required of the users to safely deliver benefit and appropriate mitigation available
- The appropriateness of the use case when considering the overall maturity and reliability of the specific type of AI in question

Training and Education

All consumers of this policy must receive appropriate training on how to best use Generative AI responsibly and effectively.

Approved and Prohibited Cases

The following table contains examples of use cases and their governance classification.

	APPROVED	SUBJECT TO I&DS APPROVAL	PROHIBITED
General			Uploading RNLI content into AI engines not licensed by the RNLI (e.g. ChatGPT) unless such content is already publicly available

<p>Content Generation</p>	<p>Drafting initial content (subject to human review) using Copilot Ideation using Copilot.</p> <p>Please use Copilot within the RNLI network, if you generate content using e.g. ChatGPT we will not be able to ensure that malicious code has not been embedded.</p>	<p>Creative content generation utilising RNLI brand imagery which will be made publicly available- please refer to the Digital Brand and Communications Team</p>	<p>Formal donor or supporter communications without review from Fundraising & Communications.</p> <p>Publishing AI generated content without an appropriate disclaimer</p> <p>Images based on real people processed or published without consent and assurance of GDPR compliance</p>
<p>Summarisation</p>	<p>Summarising documents (subject to consideration of source document quality and classification status e.g. confidential documents should be treated as such) using Copilot. NB you should fact-check all published outputs.</p>		<p>Uploading RNLI documents to an unauthorised AI system like ChatGPT, Claude, Gemini or Grok</p>
<p>Analytics</p>	<p>Simple analysis such as averages or graphical representations (subject to human review) using Copilot or other standard RNLI licensed software)</p>	<p>Creation or utilisation of models trained on RNLI data</p>	<p>Uploading RNLI data to an unauthorised AI system like ChatGPT, Claude, Gemini or Grok</p>
<p>Non-co-pilot AI</p>	<p>Utilising AI capabilities embedded in approved RNLI systems when such capability is in general release (not in pilot / optional)</p>	<p>Access to and/or licensing of any 3rd party AI capability that is not a standard product. Use of services like Grammarly without authorisation.</p>	<p>Utilisation of 3rd party AI services without permission.</p>



<p>Meetings</p>	<p>Meeting minutes & actions using enhanced Copilot in Teams.</p> <p>Transcription of meetings using standard Teams, saving as a pdf and asking browser Copilot to summarise themes and actions.</p> <p>Consenting to RNLI Copilot note-taker being used in a meeting</p> <p>Consenting to a 3rd party note-taker being used in an externally hosted meetings or RNLI meetings where a 3rd party uses their own note-taker, where the subject matter is non-confidential and personal data processing is limited to your own publicly available data (e.g. name and role)</p>	<p>Summarisation of meetings and actions using enhanced Copilot (license dependent)</p>	<p>RNLI staff using a non-microsoft Copilot note-taker (Copilot transcription should be used or an enhanced Copilot license requested)</p> <p>Meetings where a 3rd party note-taker is joined without express consent and/or where subject matter is not publicly available. Where data processing is not consented you should ask the note-taker to be removed from the meeting and cease the meeting if necessary.</p>
<p>Agentic</p>	<p>Creation of an agent using free co-pilot where of benefit</p>	<p>Creation of automated Agents using enhanced Co-pilot. Simple agents may be created via free co-pilot subject to consideration of environmental impact.</p>	<p>GDPR prohibits fully automated decision-making on an individual basis- be mindful to ensure that any use of agents does not cause a breach of this nature.</p>

Approval for using new or enhanced tools should be gained using the IT Service Help request.

Policy Breaches and Enforcement Incident Reporting

All consumers of this policy must report any suspected violations of this policy or any potential ethical, legal, or regulatory concerns related to AI through the Data Governance and Management team inbox DataGovandManagement@rnli.org.uk.

Enforcement

Violations of this policy may result in disciplinary action in accordance with RNLI's disciplinary policies and procedures.

Review information

Next review date

[06/02/2027]

Amendment history

Date	Version	Author/Contributor	Amendment details
06/02/2026	1.0	Debra Cummings	Policy replaces the previous Generative AI Policy

Review frequency

Every 2 years