



Waterford and Wexford Education and Training Board

Artificial Intelligence (AI) Policy

Revision Number	001	Document developed by	ETBI & IT Team
Approval Date	16/02/2026	Next Review Date	Annually
Document Approved by	ISMS Team & SMT	Document Noted by Board	24/02/2026
Responsibility for Implementation	IT Department	Responsibility for review and audit	Governance and Compliance



wwetb
Bord Oideachais agus Oiliúna
Phort Láirge agus Loch Garman
Waterford and Wexford
Education and Training Board

Policy

Version 001
Page 2 of 15

Title

Artificial Intelligence (AI) Policy

Title

Artificial Intelligence (AI) Policy

Table of Contents

1.	Purpose and Scope	4
2.	Ethical Use and Bias Prevention	4
3.	Legislation and Guidance.....	5
4.	Definitions.....	5
5.	Acceptable Use of AI.....	6
6.	Prohibited Practices & Prohibited Use of AI.....	6
6.1	Prohibited AI Practices	6
6.2	Prohibited Use of AI	6
7.	Training	7
8.	Roles & Responsibilities relating to this Policy.....	7
8.1	User responsibilities	7
8.2	Management responsibilities	8
8.3	ICT responsibilities	8
8.4	Data Protection Officer responsibilities	9
9.	AI Adoption Process	9
10.	Monitoring & Auditing.....	11
11.	Risk Management.....	11
12.	Human Oversight.....	11
13.	Mandatory Disclosure	11
14.	Transparency.....	11
15.	Environmental Considerations.....	12
16.	Data Protection and Security	12
17.	Incident Reporting.....	12
18.	Other Relevant Policies & Documents	12
19.	Enforcement.....	13
20.	Review of this Policy.....	13
20.1	Revision History	13
20.2	Distribution Record.....	13
Appendix 1.	Responsible Ai Canvas for Public Service	14
Appendix 2.	Guidelines for Ethical AI Usage in WWETB (Do's and Don'ts)	15

Title

Artificial Intelligence (AI) Policy

1. Purpose and Scope

This document sets out the fundamental principles, responsibilities, and governance structures for the use of Artificial Intelligence (AI) within WWETB. It provides for the ethical, secure, and transparent adoption of AI technologies by WWETB employees ensuring alignment with legal obligations under the EU AI Act and other relevant frameworks.

This Policy covers not only any GenAI products that WWETB provides to its employees, but also any third party or publicly available GenAI tool such as ChatGPT, Gemini, CoPilot and any other applications that mimic human intelligence to generate answers or perform certain tasks that are used by WWETB's employees in a professional activity.

This Policy outlines acceptable uses, approval processes, and safeguards to protect data integrity, organisational reputation, and the wellbeing of learners/students and staff.

This Policy also refers to various supporting material such as the AI Policy Guidance Document which should be read in conjunction with this Policy to ensure full understanding of the accepted process for engaging with AI within WWETB

This Policy is relevant to all staff employed by WWETB, and relates to the use of AI, for example generative, agentic, analytic, and all its currently known outputs, text, audio, image, video. All AI is to be recorded in the AI Adoption Register which may expand to include new AI technology and outputs upon review by senior management.

2. Ethical Use and Bias Prevention

It is the position of WWETB that the value of AI should not be realised at the cost of quality and value to either the ETB or the people it serves, WWETB will strive to ensure that the use of any AI is considered from a "Human first" perspective, using only AI that can show a proven track record of legal adherence and respect for the source of any materials used to train itself.

WWETB will carry out appropriate due diligence to proactively detect inherent bias both prior to deployment and post deployment to ensure that there are no unwarranted or unexpected outcomes. According to the 'Guidelines for the Responsible use of AI in the Public Service', algorithmic bias can be caused by the use of training data that reflects the existing systemic biases or by not being representative of the population that will use the AI. As a result, WWETB will take particular care to ensure that vulnerable groups are not adversely affected. WWETB will ensure proper oversight is provided so that the AI model itself is ethically balanced.

WWETB is aligned with the seven principles for the responsible use of AI as a public body as set out in the government issued Guidelines for the Responsible Use of AI in the Public Service, ([Guidelines for the Responsible Use of AI in the Public Service.pdf](#)) i.e. (1) Human agency and oversight, (2) Technical robustness and safety, (3) Privacy and data governance, (4) Transparency, (5)



Title

Artificial Intelligence (AI) Policy

Diversity, non-discrimination, and fairness, (6) Societal and environmental well-being and (7) Accountability.

Appendix 2 of the Policy sets out the Guidelines for Ethical AI Usage in WWETB *i.e.* a list of do's and don'ts.

3. Legislation and Guidance

The following are relevant legislation and guidance:

- Regulation (EU) 2024/1689 ('AI Act')
- General Data Protection Regulation 2016/679
- Data Protection Act 2018 (as amended)
- 'Guidelines for the Responsible Use of Artificial Intelligence in the Public Service' – Department of Public Expenditure NDP Delivery and Reform.

Please note that records created by AI are also subject to the Freedom of Information Act 2014 (as amended).

4. Definitions

'AI Act' refers to Regulation (EU) 2024/1689 which is legislation enacted by the European Union to ensure that AI systems are used in a safe, transparent manner that is aligned with fundamental human rights. It categorises AI systems by risk levels and sets compliance principles accordingly.

'Artificial Intelligence (AI) system' means "... 'a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments;

'Encryption' is the process of converting information so that it cannot be read by unauthorised people;

'Generative AI' ('GenAI') is a type of AI that is designed to generate content, such as text, images, or code, based on input data. Examples of GenAI are chatbots and ChatGPT.

'User' refers to an employee, whether full or part time, contractor, intern, partner, consultant, external individual or organisation.

Title

Artificial Intelligence (AI) Policy

5. Acceptable Use of AI

WWETB will ensure that its employees review the AI Adoption Register prior to using AI to ensure that such system is on the list as having been approved for use by WWETB. This register will provide direction on the type of data that can be used within a specific tool and whether its use needs to be disclosed, etc.

When using AI, Users must follow the requirements set out in this Policy and be cognisant of their responsibilities herein.

6. Prohibited Practices & Prohibited Use of AI

Use of AI that is not listed as approved in the AI Adoption Register is prohibited.

AI systems that threaten people's safety, rights, or livelihoods are strictly prohibited (except in limited circumstances) as set out in 6.1 below.

a. Prohibited AI Practices

AI systems that do the following are prohibited:

- 6.1.1. Exploit vulnerable persons, manipulate and use subliminal techniques.
- 6.1.2. Use social scoring for public and private purposes.
- 6.1.3. Predict whether a person will commit an offence based solely on profiling that person (except where the AI systems is used to support the human assessment of the involvement of a person in criminal activity that is already based on objective and verifiable facts directly linked to criminal activity).
- 6.1.4. Use untargeted gathering of facial images from the internet or CCTV so as to build up or expand databases.
- 6.1.5. Use emotion recognition in the workplace and education institution, unless for medical or safety reasons.
- 6.1.6. Categorise people according to their biometric data to assume their race, political opinions, trade union membership, religious or philosophical beliefs or sexual orientation (except where the labelling or filtering is of lawfully acquired biometric datasets, such as images, based on biometric data or categorising of biometric data in the area of law enforcement).
- 6.1.7. Use real-time remote biometric identification in publicly accessible areas and are used by law enforcement. This is subject to some limited exceptions.

b. Prohibited Use of AI

The following items are a non-exhaustive list of behaviours in line with WWETB's Code of Practice that are not permitted:

- 6.2.1. Use AI to violate any applicable laws or regulations, including data protection, intellectual property, privacy laws or geographical restrictions by using data within AI without prior consent, approval or permission of data owners.

Title

Artificial Intelligence (AI) Policy

- 6.2.2. Use AI to harass, bully, intimidate, or discriminate against other users or external parties.
- 6.2.3. Use AI to create any content that is illegal, discriminatory, defamatory, or otherwise offensive or inappropriate to any users or third parties.
- 6.2.4. Use AI to engage in any activity that could compromise the security or integrity of WWETB, including allowing an AI access to provisioned laptop, device, network, unauthorised data sets and systems.
- 6.2.5. Input of any personal, confidential, or sensitive WWETB information into an AI system, unless explicitly sanctioned in the AI Adoption Register, and always with respect to the obligations of GDPR.

7. Training

In accordance with Article 4 of the AI Act, WWETB provides AI training to ensure, to their best extent, a sufficient level of AI literacy of its staff and other persons dealing with the operation and use of AI systems on its behalf. Users will be expected to fully engage with this training provided by WWETB. If updated AI training is provided, Users are to avail of this training to ensure that they have a sufficient level of AI literacy when dealing with the operation and use of AI systems on behalf of WWETB.

8. Roles & Responsibilities relating to this Policy

a. User responsibilities

A User must adhere to the following:

- 8.1.1. In the case of a suspected data breach within or as a result of use of an AI system, the User must contact their Line Manager immediately in accordance with the Data Breach Protocol. The Line Manager will contact the Data Protection Officer immediately and as per said protocol, the DPO will make an assessment of the incident and decide whether it is to be reported to the Data Protection Commission within 72 hours of WWETB becoming aware of the breach and/or whether it is to be reported to the data subject(s);
- 8.1.2. Adhere to this AI Policy, particularly section 6 above regarding Prohibited Use of AI;
- 8.1.3. Not engage with any AI without first reviewing the AI Adoption Register, in order to understand if it is accepted for use by WWETB.
- 8.1.4. Complete AI literacy training as determined by WWETB in accordance with the AI Act;
- 8.1.5. Follow the requirements mapped out in the AI Adoption Register when using AI. This register will provide direction on the type of Data that can be processed within a specific tool and whether its use needs to be disclosed, *etc.*;
- 8.1.6. Only use AI if necessary, due to its impact on the environment.
- 8.1.7. If using AI for autonomous decision making, ensure that it is always verified by a natural person, and aligned with WWETB's [Data Protection Policy](#) & [Privacy Statement](#);
- 8.1.8. Use critical thinking to evaluate any AI-generated outputs before relying on them for any purpose.

Title

Artificial Intelligence (AI) Policy

- 8.1.9. If the use of an AI, or a type of data is not noted in the AI Adoption Register, you may apply for WWETB to consider this new AI solution by following the AI Adoption Process set out at section 9.

b. Management responsibilities

In addition to the User responsibilities above, a Manager/Director must adhere to the following:

- 8.2.1. For an AI system to be accepted for use, the AI adoption process set out in section 9 must be followed and sponsored by a suitable authority within WWETB before being reviewed by OSD for adoption and integration.
- 8.2.2. Provide training to ensure staff members are AI literate in accordance with the AI literacy obligations set out in Article 4 of the AI Act.
- 8.2.3. Any exceptions granted for use of AI in an otherwise restricted fashion, must be reviewed Annually, in line with each academic year and the authorisation of the sponsorship renewed.
- 8.2.4. The AI Adoption Register will be reviewed annually to assess the AI system's impact on administrative efficiency, value, and educational quality / outcomes for learners;
- 8.2.5. WWETB may block access to AI systems that are not listed as permitted in the AI Adoption Register;
- 8.2.6. Enable WWETB to comply with its legal responsibilities under the AI Act and provide AI training to WWETB employees;
- 8.2.7. Enable WWETB to align its AI governance structure's roles and responsibilities with its information security management system processes;
- 8.2.8. Ensure that upon implementation of a new AI or expanded use of an existing AI, training will be made available by the sponsor directorate to ensure all relevant users are trained to use the AI as intended;
- 8.2.9. Be familiar with different risk levels of approved AI systems to understand the level of human oversight required and potential risks of such AI systems.
- 8.2.10. Ensure that WWETB's AI systems are subject to an internal review annually.
- 8.2.11. Ensure that WWETB's AI systems are subject to review in response to questions or complaints raised by Users or other stakeholders. The results of such review and any remediation steps are to be recorded.
- 8.2.12. If AI systems are provided and managed by a third party, ensure that the third party's roles and responsibilities are carried out through effective oversight and contractual rights.

c. ICT responsibilities

In addition to the User responsibilities above, ICT must adhere to the following:

- 8.3.1. For an AI system to be accepted for use, the AI Adoption Process set out in this Policy must be followed and sponsored by a suitable authority within WWETB before being reviewed by OSD for adoption and integration.
- 8.3.2. Do not enable any AI system, without the OSD / ISMS team having completed a full review of the requested system.



Title

Artificial Intelligence (AI) Policy

- 8.3.3. Do not allow any exceptions to permitted data use without recording authorisation from the system sponsor and DPO
- 8.3.4. Do not enable access to any AI system without confirmed and recorded authorisation from the system sponsor which is in line with WWETB's current ISMS process;
- 8.3.5. Prior to an AI system being used by WWETB, review the AI system's security features, terms of service and privacy policy;
- 8.3.6. Control access to all approved AI systems.
- 8.3.7. Restrict or revoke persons access to approved AI at any time for any purpose.

d. Data Protection Officer responsibilities

In addition to the User responsibilities above, the DPO must adhere to the following:

- 8.4.1. Ensure that WWETB's Data Retention Schedule remains up to date regarding AI systems and records relating to AI systems.
- 8.4.2. Ensuring that WWETB's Data Protection Policy is reflective of the data processing using the AI systems.

9. AI Adoption Process

If a WWETB user wishes to use an AI system / solution for a new purpose - that is not listed as acceptable in the AI Adoption Register - then prior to using such an AI solution, the WWETB employee may submit a completed form 'Responsible AI Canvas' (see Appendix 1) regarding such an AI solution.

An AI solution may be a new feature in an AI system that already exists, an AI system that was previously restricted or a new AI system that is not used by WWETB. The following is a diagram of the suggested AI Adoption Process:

Title

Artificial Intelligence (AI) Policy

Step 1: User

- Review WWETB's AI Policy to see if the AI solution is prohibited.
- Check that the new AI solution is not already contained in the AI Adoption Register.
- Complete the 'Responsible AI Canvas'. Submit the completed 'Responsible AI Canvas' to your Line Manager for consideration.

Step 2: Line Manager

- Review submission and assess it's appropriateness for school/centre/campus.
- Agrees to support the request of the AI solution or refuses the proposal of the AI solution.
- If they decide to support the request of the AI solution, they must forward the request to their supporting Director for consideration.
- If they decide not to accept the request of the AI solution, they must inform the User of their decision and the reasons for that decision.

Step 3: Supporting Director

- Review submission and assess it's appropriateness for adoption within the relevant directorate.
- If they are satisfied with the information and intended purpose and value of the AI system, they may decide to provide sponsorship for the adoption of the AI solution and support the request. They may then forward the request to the Director of OSD/ISMS for consideration.
- If they are not satisfied with the information and intended purpose and value of the AI system, they may refuse the request. In this case, the Supporting Director must inform the relevant Line Manager who forwarded the request, of their decision and the reasons for the refusal.

Step 4: Director of OSD

- Consult with the ETBI Guidance Note, particularly the 'AI Use Decision Matrix'
- Request that the appropriate teams such as the ISMS team review the submission.
- Together with the appropriate teams determine the risk level of the proposed AI system and whether AI training would need to be updated if the request were approved.
- If they decide to approve the request of the AI solution, they will ensure that the relevant users receive updated AI training prior to using the AI solution if required and request that ICT update the AI Adoption Register accordingly. The Director of OSD once satisfied will issue instruction to integrate the AI Solution which may involve enabling a feature in a system that already exists, or allowing access to a solution previously restricted.
- If they decide to reject the request of the AI solution, they will inform the relevant Supporting Director who forwarded the request of their decision and the reasons for the refusal.

Step 5: ICT

- If the Director of OSD has approved the AI solution, ICT will implement the approved request accordingly, update the AI Adoption Register and consider whether the AI solution may require repeated sponsorship approval.

Title

Artificial Intelligence (AI) Policy

10. Monitoring & Auditing

WWETB's AI systems will be subject to an internal review annually. WWETB's AI systems may also be subject to external reviews.

WWETB's AI systems will also be subject to review in response to questions or complaints raised by Users or other stakeholders. The results of such review and any remediation steps will be recorded.

11. Risk Management

WWETB carries out a risk analysis of any AI systems that is used within WWETB or on behalf of WWETB.

WWETB will test the AI systems it uses in relation to the accuracy and reliability of such AI systems. On foot of such tests, any risks including biases, algorithmic errors or security vulnerabilities are proactively addressed.

12. Human Oversight

If a WWETB employee wishes to use an AI system that is not listed as permitted in the AI Adoption Register, then prior to using such an AI system, the WWETB employee may submit a completed 'Responsible AI Canvas' (Appendix 1) for using such an AI system.

13. Mandatory Disclosure

If a WWETB employee uses AI, they must check the AI Adoption Register to determine if they are required to disclose that they used AI as part of their work depending on the particular AI used. The AI Adoption Register will reflect that Users must disclose when content is generated by an AI system, particularly in communications, content generation, or interactions with the public or other stakeholders.

If the AI Adoption Register states that disclosure of the use of the relevant AI is mandatory, then any content created or summarised with the assistance of such AI should clearly state that AI was used and should not be presented as original work. For example, include a note such as:

"This document was created with the assistance of AI in accordance with WWETB's Artificial Intelligence Policy."

14. Transparency

WWETB must be transparent and open about the AI systems being used which includes notifying end users, such as students, learners, parents when they are interacting with an AI system such as a chatbots/AI agents/automated decision-makers. WWETB should ensure that more complex queries can be redirected to a human to answer. When the output has been generated by an AI system the user should refer to the AI Adoption Register to understand what level of transparency is required.



Title

Artificial Intelligence (AI) Policy

In accordance with the Guidelines for the Responsible Use of AI in the Public Service, WWETB must maintain clear documentation on AI model development which includes the data used, the processing that was carried out and algorithms used, the rationale for choices and for compromises made.

15. Environmental Considerations

The use of AI requires significant computational power, which will contribute to energy consumption and may increase carbon emissions. WWETB encourages Users to use AI tools responsibly and be mindful of their environmental footprint, choosing alternative, more eco-friendly tools where possible and endeavouring to only use AI when necessary.

16. Data Protection and Security

WWETB does not permit the inputting of any personal data, or any content which may be regarded as confidential, or any sensitive company information into an AI application used by WWETB except for those clearly set out in the AI Adoption Register. If there are exceptions to this prohibition for specific use cases, they will be noted and reviewed in WWETB's AI Adoption Register for all Users to understand.

Where possible, WWETB should avail of security protocols when using AI systems *i.e.* encryption, access control and data anonymisation.

WWETB prohibits the use of AI products trained on personal data except for those clearly set out in the AI Adoption Register.

Where personal data is involved, WWETB employees that use the AI systems must comply with GDPR and the Data Protection Act 2018 (as amended). WWETB employees must adhere to WWETB's Data Protection Policy and Data Retention Schedule.

All Users must adhere to WWETB's Data Protection Policy available [on the Staff Hub](#).

17. Incident Reporting

In addition to Users' responsibilities regarding reporting a suspected data breach, if a User identifies any suspected risks or issues with a particular AI system such as biases, algorithmic errors or security vulnerabilities, they must contact their Line Manager/ISMS Team immediately so that the risk can be mitigated or the issue resolved as quickly as possible.

18. Other Relevant Policies & Documents

This Policy is to be read in conjunction with the following policies and documents:

- WWETB's [Data Protection Policy](#)
- WWETB's [Data Retention Schedule](#)
- WWETB's [Cybersecurity Policy](#)
- WWETB's [Acceptable Usage Policy](#)

Title

Artificial Intelligence (AI) Policy

- WWETB's [Employee Code of Conduct](#)
- WWETB's [Dignity at Work Policy](#)
- WWETB's [Equality, Diversity & Inclusion Policy](#)

19. Enforcement

Users who are found to be in breach of this Policy, may be subject to disciplinary action up to and including dismissal. Should an investigation regarding compliance with this Policy determine that there is a case to answer by a User, the matter will be referred to the appropriate stage of the relevant disciplinary procedure relevant to that User.

20. Review of this Policy

This Policy has been approved by senior management, who is committed to the ethical, secure, and transparent adoption of AI technologies in WWETB, together with ensuring alignment with legal obligations under the AI Act and other relevant legislation.

This document will be reviewed annually by senior management, to ensure alignment to appropriate risk management requirements and best practice for the management of ICT devices within WWETB.

a. Revision History

Version	Date	Author	Approvers	Summary of Changes

b. Distribution Record

Version	Date	Recipient List	Approver



Title

Artificial Intelligence (AI) Policy

Appendix 1. Responsible AI Canvas for Public Service



An Roinn Ceiteachais Phéiblí
Sheachadadh PPSN agus Aithectóiríthe
Department of Public Expenditure
NDP Delivery and Reform

Responsible AI Canvas for the Irish Public Service

Project Name:

Project Lead:

Date:

Stakeholders

Who are the key stakeholders affected by this AI project?

Internal stakeholders?

External stakeholders?

Impact groups?

Problem Statement

What specific problem are we solving?

Why AI?

Why is AI the best solution?

What type of AI solution is the best fit?

Inclusion & Diversity

How will we incorporate diverse perspectives?

Risk Assessment and Mitigation

What are the potential risks and how will they be mitigated?

Human Agency and Oversight

Where will human oversight be integrated into AI decision-making?

Could the AI system negatively affect fundamental rights? If so, has a fundamental rights impact assessment been conducted?

Technical Robustness and Safety

Security policies & procedures to be followed

High-level fall-back plan

Planned high-level testing procedures

Privacy and Data Governance

What data protection procedures do we need to follow?

Transparency

What level of transparency / explainability is required for the AI system?

Diversity, Non-Discrimination and Fairness

Bias detection and mitigation strategies

How will we make the AI system accessible and inclusive?

Societal and Environmental Well-being

How could the AI system positively and negatively contribute to Irish society?

EU AI Act

EU AI Act Risk Categorisation

Who will act as the 'Provider' & 'Deployer'?

Legal Compliance and Oversight

Aside from the EU AI Act & GDPR are there any other legal principles to consider?

What steps will we take to ensure the AI system meets legal & regulatory principles?

Communication

How will the system's operation be communicated to the end-user?

Accountability

Who will be accountable for each stage of the AI lifecycle?

Available: [Responsible AI Canvas.pdf](#) and <https://www.gov.ie/en/department-of-public-expenditure-infrastructure-public-service-reform-and-digitalisation/publications/artificial-intelligence-resources/>



Title

Artificial Intelligence (AI) Policy

Appendix 2. Guidelines for Ethical AI Usage in WWETB (Do's and Don'ts)

Do's

- ✓ **Ensure Human Oversight:** Always maintain human control and intervention in AI systems to prioritise ethical decision-making.
- ✓ **Verify AI Responses:** AI systems can provide hallucinations which is false information therefore responses from AI systems must be verified by a human to ensure their accuracy.
- ✓ **Conduct Risk Assessments:** Perform thorough risk assessments for high-risk AI systems before approval to determine potential risks.
- ✓ **Promote Transparency:** Clearly state when AI tools are used in work and ensure that AI-generated content is not presented as original work.
- ✓ **Safeguard Data:** Protect personal data and ensure secure data handling in compliance with regulations like GDPR.
- ✓ **Provide AI Training:** Management must provide staff with the necessary knowledge and training to understand and use AI systems responsibly. Staff complete such training where required to do so by management.
- ✓ **Monitor AI Systems:** Continuously monitor AI systems for performance and security risks, and conduct periodic AI audits.
- ✓ **Foster Diversity and Fairness:** Avoid unfair bias in AI systems and ensure that AI-generated content is ethical and non-discriminatory.
- ✓ **Consider Environmental Impact:** Use AI tools responsibly to minimise energy consumption and carbon emissions.

Don'ts

- ☒ **Don't Use Black-box AI:** Do not use AI systems that lack transparency and explainability, as they can affect public trust.
- ☒ **Don't Input Personal Data:** Do not input personal, confidential, or sensitive company information into AI applications.
- ☒ **Don't Encourage Unethical Use:** Do not use AI applications to generate content for bullying, harassment, or any explicit or offensive purposes.
- ☒ **Don't Use for Non-Work purposes:** Do not use AI tools for personal or non-work-related tasks on ETB systems or accounts.
- ☒ **Don't Use Unauthorised AI:** Do not use AI systems that are prohibited under the EU AI Act or those that are listed in the ETB's AI Adoption Register