



ACCEPTABLE USE OF GenAI POLICY

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1. PURPOSE

- 1.1 The Company acknowledges that currently employees may be using third-party, publicly available generative artificial intelligence (GenAI) tools, e.g. OpenAI's ChatGPT, Google's Gemini or Anthropic's Claude, as part of performing their work duties, or may do so in the future as the technology continues to develop at pace and use becomes more accepted and widespread in society generally.
- 1.2 The ability of GenAI tools to generate content offers exciting opportunities to streamline work activities and to increase efficiency.
- 1.3 However, GenAI tools come with serious security, accuracy, ethical, legal and intellectual property risks.
- 1.4 This policy is designed to:
 - highlight the unique issues raised by GenAI;
 - help employees understand the rules for its acceptable use; and
 - help protect the Company's information, intellectual property, workplace culture, commitment to diversity and its reputation.

2. SCOPE

- 2.1 This is a group level policy that applies to all employees of Anglian Water Group Limited and its subsidiary companies, with the exception of Anglian Water (Ireland) Limited and Wave Limited (and their respective subsidiaries, which include Celtic Anglian Water and Anglian Water Business (National)).
- 2.2 'Authorised users' in this policy includes employees, workers and Alliance partner employees.
- 2.3 This policy does not cover the use of GenAI or AI tools formally approved by Anglian Water (e.g. Microsoft Copilot), which are covered by separate internal policies and guidance.

3. STATUS

- 3.1 This policy and guidelines are subject to regular reviews (annually as a minimum) by the Company and are updated as appropriate.

4. POLICY OWNER

- 4.1 This policy is owned by Group Head of Employee Relations.

5. POLICY

- 5.1 When using any third-party or publicly available GenAI tools (and similar technologies), which mimic human intelligence to generate answers, work outputs or perform certain tasks, users **must** follow the rules set out in this policy.
- 5.2 This policy must be understood and complied with in conjunction with any other relevant guidance and instruction issued by the Company on the [AI Lighthouse pages](#) or otherwise.

5.3 Rules For GenAI Use

THINGS YOU MUST KNOW, UNDERSTAND AND DO:

- GenAI tools are useful but are **not a substitute** for human judgement and creativity.
- Most GenAI tools are prone to 'hallucinations', false answers, biased information or information that is stale. Therefore, **responses must always be carefully reviewed by a human.**
- The human review must include checking for accuracy, bias, inappropriate statements, compliance and consistency with all Company policies and applicable laws.
- You are personally responsible and liable for the content that you create.
- Use your Company credentials only if using solely for work purposes.
- Make it clear that GenAI was used in the creation of your content:
When using GenAI to directly produce work material, that material must contain the statement, "**This was created by Generative AI**".
When using GenAI to contribute to work material you are producing, i.e. the material includes your work and output from GenAI, it is recommended you include the statement, "**This includes content created by Generative AI**".
- Treat every bit of information you provide to a GenAI tool as if you are publishing it on the internet, i.e. that it might be seen by everyone on the internet and attributed to the Company, regardless of the settings you have selected within the tool, or the assurances made by its creators. The risk of information getting out there is very high.
- Report any GenAI concerns to AIGovernance@anglianwater.co.uk and report any personal data breaches to GDPR@anglianwater.co.uk.
- Remember that any use of GenAI tools involving customer or employee data, sensitive information, commercially confidential information or proprietary information (information legally owned, and to which the Company has exclusive rights) or as part of strategic business activities **must** be endorsed by our formal governance process and sign-off, including an **AI Risk Assessment**, and, if personal data is being processed, a **Data Protection Impact Assessment** (DPIA), and be notified to AIGovernance@anglianwater.co.uk.
- Remember that the use of GenAI may be monitored and audited.

THINGS YOU MUST NOT DO:

- Don't make a prompt to generate content that involves inputting or the use of any Company information, including confidential information and propriety information

(information legally owned, and to which the Company has exclusive rights to) except where the Company information has been properly authorised for external publication. It is acceptable to use information that the Company has made publicly available, e.g. the Company's Annual Performance Report 2023.

- Don't make a prompt to generate content which involves inputting or use of **any personal data** (customer or employee) or any personally identifiable information, e.g. names, addresses, email addresses, phone numbers, account numbers, photographs, audio recordings, video etc.
- Don't make a prompt to generate content which involves inputting or use of **any sensitive information** (e.g. information relating to health, gender, race, ethnicity, political opinions, trade union membership, religion or philosophical beliefs, sexual orientation, biometric data, priority services register information, extra care assessment information, personal financial and payment information etc).
- Don't share or allow your GenAI credentials to be used by anyone else.
- Don't share a GenAI output with a third party who may place reliance on its accuracy, i.e. an organisation outside of our Company, including Alliance Partners.
- Don't use GenAI tools to make or help you to make employment decisions or to mark or score employee assessments, work or tests.
- Don't represent work generated by GenAI as being your own original work (this could amount to plagiarism and may result in disciplinary proceedings).
- Don't use GenAI tools to access information that you are not authorised or permitted to view. To do so may amount to criminal offences under the Data Protection Act 2018 and the Computer Misuse Act 1990.
- Don't use GenAI tools for any purpose or in any way that is incompatible with other Company policies and procedures, e.g. [Acceptable Use of IT Policy](#) and [Data Protection Policy](#).

5.4 Examples

Compliant Uses:

- Using GenAI to generate ideas for brainstorming a session on a new challenge/topic.
- Working with GenAI to analyse pre-anonymised datasets of customer interactions to spot trends and sentiment.

Non-Compliant Uses:

- Using GenAI to generate customer complaint responses.
- Employing GenAI to review job applications and to generate candidate scores.

5.5 Breaches of Policy

- 5.5.1 GenAI users are expected to do the right thing and to comply with this policy and all relevant Company policies and procedures.
- 5.5.2 Failure to comply with this policy may result in disciplinary action, up to and including dismissal. It may also lead to legal action being taken against you.
- 5.5.3 If you are concerned that someone is not adhering to this policy, please report your concerns to AIGovernance@anglianwater.co.uk , or to the Data Protection Team via GPDR@anglianwater.co.uk , or anonymously through our Company's [Whistleblowing Policy & Procedure](#).

Further Assistance

For further assistance please visit the [AI pages on Lighthouse](#).

LAST REVIEWED

October 2025