RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE POLICY AND PROCEDURE

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Purpose and Scope

The purpose of this policy and procedure is to:

- define the responsible use of Artificial Intelligence (AI) within Bilingual Care, ensuring all workers understand what constitutes appropriate situations in which AI may be used
- outline the principles and practices for the ethical, safe, and transparent use of Artificial Intelligence (AI) by Bilingual Care
- ensure a fair, confidential, and transparent process for addressing complaints and resolving concerns and
- comply with relevant workplace laws, government statements and Bilingual Care's *Staff Code of Conduct*

This policy and procedure applies in the context of all work-related activities and events, which may also occur outside of working hours, including:

- the physical workplace
- work-related travel
- offsite work events (e.g., meetings, training, conferences, functions, social gatherings) and
- digital communications, including emails, messages, video calls, and social media.

It applies to all Bilingual Care staff, contractors, volunteers and third-party vendors involved in the development, procurement, deployment, or use of AI systems within Bilingual Care and meets relevant legislation, regulations and Standards.

Applicable Strengthened Aged Care Quality Standards

- Standard 1: The Person
- Standard 2: The Organisation

Definitions

Artificial Intelligence (AI) refers to the simulation of human intelligence in machines that are programmed to think, learn, and solve problems. These systems can perform tasks that typically require human intelligence, such as understanding language, recognising patterns, making decisions, and adapting to new information.

Examples of AI tools across different domains:

- Language & Communication - *ChatGPT / Microsoft Copilot*: Conversational AI that can answer questions, write content, and assist with tasks. *Grammarly:* Uses AI to check grammar, suggest improvements, and enhance writing style.
- Image & Video - *DALL·E:* Generates images from text descriptions. *Runway ML:* AI-

powered video editing and generation tools.
- Productivity & Automation - *Notion AI*: Enhances notetaking and organization with smart summaries and writing help.
- Data & Analytics - *Tableau with Einstein AI*: Provides predictive analytics and insights from data.
- Healthcare - *IBM Watson Health:* Assists in diagnosing diseases and analysing medical data.

Policy

Bilingual Care is committed to ensuring the responsible, ethical, safe, and transparent use of Artificial Intelligence (AI) within its business. The Leadership Team strives to provide an environment in which staff can safely use AI tools to enhance service delivery, support decision making and potentially improve accessibility without compromising our human-centred values or the rights of our consumers.

Guiding Principles

To support Bilingual Care's commitment to using AI safely and responsibly, staff may use AI tools to enhance services, support decision-making, and improve accessibility. This must always align with human-centred values and protecting consumers' rights. Everyone covered by this policy and procedure is expected to follow the Australian Government's minimum ethical principles for AI use in workplaces[1] outlined in the table below:

Principle	Approach
1. **Human, societal, and environmental well-being**	AI systems should be used to provide benefit to individuals, society, and the environment.
2. **Human-centred values**	AI systems should enhance, but not replace, human decision-making, respect human rights, diversity, and support consumer autonomy.
3. **Fairness**	AI systems should be inclusive and accessible and should not involve or result in unfair discrimination against individuals, communities, or groups.
4. **Privacy protection and security**	AI systems must be trained to respect, protect, and uphold consumer privacy rights and data protection, and ensure the security of their data in compliance with the *Privacy Act 1988 (Cth)* and strengthened Aged Care Quality Standards.
5. **Reliability and safety**	AI systems must be tested for safety, accuracy, and reliability to ensure they operate in accordance with their intended purpose before they are deployed.

[1] Department of Industry, Science and Resources. (2024) *Australia's AI Ethics Principles*. Department of Industry, Science and Resources. Accessed 27 August 2025. Available from https://www.industry.gov.au/publications/australias-artificial-intelligence-ethics-principles/australias-ai-ethics-principles

6. Transparency and explain-ability	Consumers must be informed when AI systems are used in services that affect them. There must be transparency and responsible disclosure so people can understand when they are being significantly impacted by AI and can find out when they are engaging with an AI system.
7. Contestability	When an AI system significantly impacts a consumer, community, group or environment, there must be a timely process to allow a consumer to challenge the use or outcomes of the AI system.
8. Accountability	Clear lines of accountability must be established for AI decisions and outcomes. People responsible for the different phases of the AI system lifecycle should be identifiable and accountable for the outcomes of the AI systems, and human oversight of AI systems must be enabled.

These guiding principles are intended to operate in addition to, and in conjunction with, Bilingual Care's *Staff Code of Conduct.*

Bilingual Care will take all complaints of improper use of Artificial Intelligence (AI) seriously and will respond with impartiality and confidentially.

Bilingual Care staff are expected to comply with all relevant legislation, Bilingual Care's *Staff Code of Conduct* and this policy and procedure when using Artificial Intelligence (AI) for work-related purposes.

Procedures

General

Bilingual Care's Leadership Team is responsible for fostering and promoting an organisational culture of ensuring the responsible use of Artificial Intelligence (AI) within its work practices. It reviews its effectiveness regularly, as per the *Governance Policy and Procedure* and *Continuous Improvement Policy and Procedure*.

As per Bilingual Care's *Recruitment and Onboarding Policy and Procedure* and *Training and Development Policy and Procedure*, all staff must undergo Induction and regular training that covers the responsible use of AI, including:

- obligations under State and Federal legislation
- the attributes that are covered under the *Privacy Act 1988 (Cth)* and the *Aged Care Strengthened Quality Standards*
- Bilingual Care's legal responsibility to adhere to the relevant legislation and desire to support the ethical guiding principles regarding the use of AI
- what AI functionalities are appropriate for Bilingual Care's operation and the limitations of using AI in different contexts
- informing consumers and their families and gaining their consent when AI is used in their service delivery or uses their personal information and

- how to engage with consumers and their families to inform them about AI use and gain their feedback.

Staff knowledge and application of this policy and procedure are monitored on a day-to-day basis and through annual Performance Reviews. Additional formal and on-the-job training is provided to staff where required.

Staff understanding of how to responsibly use AI in the workplace, and Bilingual Care's prevention strategies, are included in risk assessments of AI systems (see the *Risk Management Policy and Procedure*.

Acceptable Use

AI systems may be used to:

- enhance service delivery (e.g., scheduling, communication aids)
- support decision-making (e.g., risk assessments, resource allocation)
- improve accessibility (e.g., AI-enabled assistive technologies)

AI systems must not be used to:

- make final decisions about consumer eligibility or funding without human oversight
- monitor consumers without informed consent
- replace human support in high-risk or sensitive contexts

When AI systems are implemented, the Managing Director must ensure that:

- AI-driven recommendations are reviewed by human coordinators
- AI-driven clinical decisions are reviewed by qualified health professionals
- AI-driven monitoring and support systems are transparent and consented to by consumers

Consumer Rights

Consumers have the right to:

- be informed about the use of AI in their services
- opt out of any AI-driven services where feasible
- request human review of any AI-influenced decisions and
- access information about how their data is used by AI systems within Bilingual Care's business operations.

If a consumer has concerns or wishes to provide feedback about the use of AI in their services, they may contact the Managing Director or submit feedback as per Bilingual Care's *Feedback and Complaints Policy and Procedure*.

Responsibilities

The Leadership Team is responsible for ensuring:

- risk assessments are conducted before deploying AI technologies and that AI systems in use are regularly audited for accuracy, reliability, and fairness and are in alignment with the *Guiding Principles*
- there is documentation of AI systems, including purpose, data sources, and decision logic
- data protection measures are implemented to safeguard consumer information
- protocols for human intervention in AI-driven processes are established

- AI applications that are developed align with the *Guiding Principles*, Bilingual Care's values, and the strengthened Aged Care Quality Standards and
- that consumers and their families are engaged and informed about AI use, to gain their consent and feedback.

Implementation

The following process should be followed when considering implementation of an AI application or system.

Step 1: Assess Purpose and Need

- Confirm AI use is necessary and clearly improves service delivery, decision-making, or accessibility for intended application.
- Ensure AI complements - not replaces - human judgement and person-centred care.

Step 2: Evaluate AI Tool

- Check that the tool aligns with the *Guiding Principles*. Consider using tools reviewed by reputable sources or government-endorsed frameworks.
- Document an AI Tool Risk Assessment before implementation.

Step 3: Gain Consent (if relevant)

- Where AI interacts directly with consumers or their personal data, explain its purpose clearly.
- Obtain consent in line with privacy and safeguarding requirements.

Step 4: Implement Controls

- Restrict access to trained staff only.
- Use the minimum personal data required for the tool to function.
- Set up regular system checks and keep logs of AI-assisted decisions.
- Allocate responsibility for human oversight of the system.

Step 5: Monitor and Review

- Review AI outputs regularly for accuracy, fairness, and unintended impacts.
- Encourage staff and consumers to report issues or concerns.
- Document actions to improve performance or outcomes in Bilingual Care's *Continuous Improvement Plan*
- Reassess AI tools annually or when updates occur to ensure ongoing compliance.

Supporting Documents

Documents relevant to this policy and procedure include:

- *Governance Policy and Procedure*
- *Continuous Improvement Policy and* Procedure
- *Privacy and Confidentiality Policy and Procedure*
- *Records and Information Management Policy and Procedure*
- *Recruitment and Onboarding Policy and* Procedure
- *Risk Management Policy and Procedure*

- *Training and Development Policy and Procedure*
- *Staff Code of Conduct*

Monitoring and Review

This Policy and Procedure will be reviewed at least every two years by the Leadership Team. Reviews will incorporate staff and other stakeholder feedback.

Bilingual Care's feedback collection mechanisms will assess whether:

- training and support provided to staff in the workplace is up to date, based on best practice and effective
- ethical principles are being followed in AI applications and
- consumer awareness of their rights and the extent to which they feel able and supported to exercise them

Bilingual Care's *Continuous Improvement Plan* will be used to record identified improvements and monitor the progress of their implementation. Where relevant, this information will be considered as part of Bilingual Care's service planning and delivery processes.

DOCUMENT CONTROL

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