

Ethical & Acceptable Use of Artificial Intelligence (AI)

Policy

Introduction:

This policy outlines the ethical and acceptable use of Artificial Intelligence (AI) tools and platforms within First Recruitment Group. It is designed to ensure that AI technologies are used responsibly, in line with company values, UK and any other relevant laws (including the Data Protection Act 2018 and UK GDPR), and best practices in digital ethics.

Only company approved AI tools may be used. See appendices.

Scope:

This policy applies to all employees, contractors, consultants, prospective candidates, and any other individuals using AI technologies on behalf of First Recruitment Group.

It covers:

- Use of company approved AI tools and generative AI systems
- Integration of AI into business processes, services, or client offerings
- Any development, deployment, or procurement of AI-enabled solutions

Definition of Artificial Intelligence:

Artificial Intelligence (AI) refers to the application of computer systems or software that are capable of performing tasks or producing outputs that would normally require human intelligence. This includes, but is not limited to, systems that analyse data, make predictions or recommendations, support decision-making, or generate new content such as text, images, audio or video (commonly referred to as **generative AI**), often by applying machine-learning techniques to large volumes of reference data.

For the purposes of this policy, AI also includes generative AI tools and any AI functionality embedded within third-party software, platforms, or services used by First Recruitment Group.

Guiding Principles:

The following principles underpin our use of AI:

Transparency:

- Employees must disclose when content is AI-generated, particularly in external communications, marketing, or client-facing work
- AI-generated information may support analysis and understanding; however, it must not be used to make final decisions. All decisions must rely on human judgement and established processes
- This AI Policy will be made available on all group websites.

Human Oversight:

- AI should augment, NOT replace, human judgment
- All decisions with legal, financial, ethical, or reputational implications must involve human review and be justifiable and explainable.

Fairness and Non-Discrimination:

- AI tools must be used in a way that avoids reinforcing bias or discrimination
- Employees must not use AI for profiling or automated decision-making in recruitment or employment without prior approval and appropriate safeguards.

Privacy and Data Protection:

- Personal data must not be entered into AI systems unless those systems are approved, secure, and compliant with UK GDPR and all relevant company policies and current government legislation
- No identifiable client, candidate, or employee data should be submitted to publicly accessible AI platforms
- Privacy Notices will reference our ethical use of AI.

Accuracy and Accountability:

- Users are responsible for verifying the accuracy of AI-generated outputs before acting on them
- The company is not liable for decisions made based on AI without appropriate human validation.

Acceptable AI Use: General

- Drafting internal communications, reports, or templates
 - Summarising documents or meetings
- Brainstorming for marketing, content, or presentations
- Automating repetitive admin tasks, provided appropriate safeguards are in place

Acceptable AI Use: Recruitment

- Boolean search help
- Candidate/CV handling/editing (of anonymised* CVs only-i.e. remove all personal info, such as name, contact details, location, employer names, and anything that could identify an individual)
 - Drafting & refining job ads (language and bias)
 - Understanding of job specs
- Software we use where AI functionality is embedded e.g. LogicMelon Assist or LinkedIn

All use must:

- Align with the company's values and policies
- Respect copyright and intellectual property rights
 - Avoid generating offensive, discriminatory, or inappropriate content
- Have awareness of potential for inaccuracies in output: e.g. Americanisation

If in doubt:

Ask a senior colleague for an independent sense/fact check or IT for further information.

Prohibited AI Use:

- Processing personal or sensitive data without compliance function approval
- Identifiable candidate data should not be entered into public AI tools like 'ChatGPT' and should only be handled within approved internal systems.
- Creating false or misleading content, including impersonation or deepfakes
- Guiding decisions on UK and international Law & legislation – refer to primary sources only or compliance department
 - Any unlawful, unethical, or non-business-related purposes
- Anything that breaches existing company policies, for example exposing the company to reputational or financial harm, or contractual liabilities.

Use of AI by Job Applicants and Candidates:

First Recruitment Group recognises that applicants and candidates may use AI tools to support their job search, including researching the company, drafting applications, or preparing for interviews.

However:

- AI must not be used to falsify qualifications, experience, employment history, or identity
- AI must not be used to misrepresent the candidate's own skills, authorship, or decision-making ability
- Any information submitted must be truthful, accurate, and capable of verification.

Where the use of AI results in misleading or dishonest representations, this may result in:

- Removal from the recruitment process
- Withdrawal of an offer
- Termination of an assignment.

Training and Awareness:

All employees will receive induction and periodic refresher training on the ethical use of AI tools. Users will be informed about updates to this policy and emerging risks related to AI technologies.

Reporting and Breaches:

Any misuse of AI or suspected policy breaches must be reported immediately to the line manager; compliance function or the data protection officer (DPO). Note disciplinary action may be taken in-line with the company's disciplinary procedure.

Responsibility Matrix:

Title:	Responsibility:
Managing Director	Overall responsibility for AI legislation compliance
Head of Compliance & Commercial	Company Data Protection Officer (DPO) Day-to-day compliance with company data protection and AI policies and procedures Maintenance of approved list of AI tools
Cross-Company AI Compliance Team	Regular analysis and monitoring of AI risks & opportunities impacting all business activities
Head of People & Culture	Provision of appropriate AI training and awareness including induction and refresher Management of AI in internal recruitment
IT Manager	Awareness of AI capabilities in systems and software purchasing decisions
Client Managers	Understanding and compliance with client AI policies
All employees	Understanding their obligations and ensuring all AI processing is conducted in-line with company policies and procedures Informing a senior company representative if they do not understand their obligations or an AI breach has been identified

All other stakeholders	Understanding their obligations and ensuring all AI processing is conducted in-line with company policies and procedures Informing a senior company representative if they do not understand their obligations or an AI breach has been identified
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This policy will be reviewed annually or sooner if significant developments in AI regulation or usage arise.

Related Policies and Control Measures:

- **ICO Registration: ZA 209555**
- **Cyber Essentials Certificate**
- **Management System operating in accordance with ISO 42001**
- **ISO9001 Certificate**
- **DPO in place**
- ***Data & Systems Security Policy***
- ***Data Protection Policy***
- ***Data Breach Policy & Procedure***
- ***Data Breach Log***
- ***Data Retention and Deletion Rules***
- ***Recruitment Policy***
- ***Social Media Policy***
- ***Ethical Code of Conduct***

Signed



Mark Isherwood
M.D

Date: 12th March 2026

Appendix: List of Approved AI tools:

- Microsoft Co-Pilot; including Windows, Teams, and Microsoft Office integrations
- AI Offerings built-in to existing approved applications, for example LinkedIn Assist

Policy Area: Compliance	Version: 1	Approved Date: 03/2026
Title of Policy: Ethical & Acceptable use of Artificial Intelligence (AI) Policy	Approved By: Managing Director	
AI Assistance used in this policy: Yes		