

Artificial Intelligence Guidance & Acceptable Use Policy

As a people-oriented business with a firm belief in the value of human connection and collaboration, we take a human-centric approach to our business operations. In line with our Vision (making Artificial Intelligence work for us) and Values – we remain agile to the changing marketplace and the technological advances that continue to shape how we work and take a balanced view on where human creativity, innovation and critical thinking can work alongside technology for the benefit of us all.

Artificial Intelligence (AI) is an important business tool that can support smarter working, increase productivity, enhance quality, generate ideas, analyse information, draft content, and reduce time spent on repetitive tasks. When used responsibly, AI enables employees to focus more of their time on activities that require human judgement, creativity, relationship building, and decision-making.

Steps has a reasonable expectation that all employees will actively consider and appropriately use approved AI tools where they can safely improve efficiency, quality, accuracy, consistency, or productivity. AI should be viewed as a tool to augment and support our work rather than replace professional expertise, accountability, creativity and creative partnership, and human judgement.

Purpose

This document sets out:

- Guidance and expectations for the effective use of AI to support and enhance Steps' work.
- How all persons working on behalf of Steps may use artificial intelligence (AI) tools safely, responsibly, and in line with Steps' standards, legal requirements and data protection obligations.

Scope

This policy applies to:

- All persons working for or on behalf of Steps, including:
 - Employees (permanent and temporary).
 - Directors and officers.
 - Contractors, consultants, freelancers, and associates.
 - Third parties acting on Steps' behalf.
- All AI systems, generative AI tools, machine learning systems, algorithmic decision-support tools, intelligent automation, and AI-enabled features embedded within third-party platforms.

Core Principles

All persons working on behalf of Steps remain responsible for reviewing, validating, and approving any outputs generated by AI before they are relied upon, shared, or used for decision-making.

When using AI, you must:

- **Act responsibly** – You remain accountable for any work produced using AI.
- **Check accuracy** – AI outputs may be incorrect, incomplete, or misleading; always review before use.
- **Protect data** – Do not input confidential, personal, client, or commercially sensitive information into unapproved AI tools.
- **Use approved AI tools only** – Only use AI tools that have been approved by Steps
- **Apply judgement** – AI should support your work, not replace professional or managerial decision-making.
- **Be transparent** - If requested, be transparent with clients about when we have, or are intending to use AI on a programme.

Approved AI Tools

The list of approved AI tools is currently under development and will be maintained separately from this policy. All AI tools must be used responsibly and in accordance with the requirements set out in the "Data Protection & Confidentiality" section below.

Data Protection & Confidentiality

- Treat AI tools as external systems unless formally confirmed otherwise.
- Do not input sensitive data unless explicitly authorised.

Examples of sensitive data include information protected by law or regulation (e.g. GDPR) and information protected by confidentiality obligations. Examples include client names, contractual commercial information, Steps financial data, employee personal data, and other confidential business information.

Data classified as sensitive may only be processed using Steps' approved Microsoft Copilot environment when accessed using a Steps Microsoft account (stepsdrama.com).

Verification and Quality Control

Before using AI-generated output, you must:

- Check facts and figures.
- Confirm legal or technical content where relevant.
- Ensure tone and appropriateness.
- Take responsibility for final content.

Permitted Use

You may use approved AI tools for low-risk tasks such as:

- Drafting or editing internal documents.
- Summarising notes or meetings.

- Research support, brainstorming, or idea generation.
- Formatting or structuring content.
- Low-risk process automation.

All outputs must be reviewed before being shared or relied upon.

Prohibited Use

You must not use AI to:

- Upload or process confidential, personal, or client-sensitive data in **unapproved AI tools**.
- Make decisions affecting Steps as a business, our employees, customers, or third parties **without** human oversight.
- Produce or provide legal, financial, or contractual documents **without** appropriate human review.
- Create or distribute customer-facing communications **without** appropriate human review.
- Create misleading, biased, discriminatory, or harmful content.
- Present AI-generated output as verified fact without checking accuracy.
- Generate content that infringes copyright, intellectual property rights or confidentiality obligations.
- Circumvent Steps' security controls or acceptable use policies.

Reporting Issues

Report immediately to your line manager and the Finance & Operations Director if you:

- Accidentally share sensitive data via an AI tool.
- Receive incorrect or inappropriate outputs that could cause harm.
- Identify unauthorised or risky use of AI.

Non-Compliance

Failure to comply with this policy will be treated seriously and **may** result in removal of access to AI tools, disciplinary action, termination of contractual arrangements (in the case of contractors or suppliers) or other appropriate action depending on the severity of the breach.

Monitoring and Review

This policy is monitored and reviewed:

- **At least** annually
- Following significant legal, regulatory, or business changes
- After any serious incident involving AI