

## **PROCEDURE NO. 54**

### **Artificial Intelligence (AI) Policy**

#### **1. Introduction**

The rapid development of artificial intelligence (AI) presents significant opportunities for Apex Resource Management Ltd to improve efficiency, enhance candidate and client experiences, and support innovation across recruitment operations. AI can assist with tasks such as candidate sourcing, CV screening, market analysis, communications, and internal productivity.

However, the use of AI also carries risks, particularly in relation to data protection, bias, transparency, accuracy, and trust. As a UK recruitment business, Apex Resource Management Ltd must ensure that any use of AI is lawful, ethical, and aligned with our professional standards, obligations to clients and candidates, and UK regulatory requirements.

This policy sets out the principles and guidance governing the responsible use of AI at Apex Resource Management Ltd, including by employees, contractors, and third-party suppliers.

This policy will be reviewed and updated regularly to reflect changes in technology, legislation, and best practice.

#### **2. Our Principles for the Use of AI**

Any use of AI by Apex Resource Management Ltd must:

- Maintain trust with candidates, clients, and partners.
- Comply with UK law and regulation, including the UK GDPR, Data Protection Act 2018, Equality Act 2010, and employment legislation.
- Be transparent, accountable, and subject to appropriate human oversight.
- Be fair, non-discriminatory, and designed to minimise bias.
- Protect personal data, confidential information, and commercial interests.
- Support, not replace, professional human judgement in recruitment decisions.

#### **3. What Is Artificial Intelligence?**

Artificial intelligence refers to machine-based systems that can perform tasks normally associated with human intelligence, such as analysing information, identifying patterns, generating text or images, making predictions, or supporting decision-making.

Generative AI is a subset of AI that can produce new content (such as text, images, audio, video, or code) in response to user prompts.

#### **4. Appropriate Use of AI in Recruitment**

AI may be used at Apex Resource Management Ltd to support recruitment and business activities where it is appropriate, proportionate, and lawful. Examples include:

- Drafting job descriptions, adverts, and candidate communications (subject to review).
- Supporting candidate sourcing and talent mapping.
- Assisting with CV parsing or skills matching.
- Analysing labour market trends and salary data.
- Improving internal productivity (e.g. summarisation, note-taking, or research support).

AI must not be used as the sole basis for:

- Hiring, shortlisting, or rejection decisions.
- Assessing candidate suitability without human review.
- Making employment-related decisions that have legal or material impact on individuals.

Human oversight must always be maintained, and final decisions must rest with appropriately trained staff.

## **5. Bias, Fairness and Equality**

AI systems are influenced by the data on which they are trained and may reflect or amplify existing biases. Before deploying or using AI tools, consideration must be given to:

- The risk of bias or discrimination against protected characteristics.
- Whether outputs could unfairly disadvantage candidates or clients.
- Whether the AI is appropriate for use in a recruitment context.

AI tools must be used in a way that supports equality, diversity, and inclusion, and must comply with the Equality Act 2010.

## **6. Accuracy and Reliability**

Generative AI systems do not guarantee factual accuracy and may produce incorrect, misleading, or fabricated information (sometimes referred to as “hallucinations”).

Any AI-generated content used by Apex Resource Management Ltd must be:

- Reviewed and verified by a human before use.
- Checked for accuracy, relevance, and appropriateness.
- Clearly corrected where errors are identified.

AI outputs must never be relied upon without appropriate scrutiny.

## **7. Plagiarism and Intellectual Property**

AI-generated content may replicate or closely resemble existing material.

Staff must ensure that:

- AI-generated content does not infringe copyright or intellectual property rights.
- Content presented as original has been sufficiently reviewed and amended where necessary.
- The rights of third parties, clients, and candidates are respected.

## **8. Data Protection and Confidentiality**

The use of AI must comply with data protection and information security requirements.

In particular:

- Personal data (including candidate and client information) must not be entered into AI tools unless approved and compliant with UK GDPR.
- Confidential, commercially sensitive, or proprietary information must not be shared with unauthorised AI systems.
- Staff must understand whether AI providers store, reuse, or train on submitted data.

Only approved AI tools may be used for work purposes, in line with company IT, procurement, and data protection policies.

## **9. Transparency**

Where appropriate, Apex Resource Management Ltd will be transparent about its use of AI, particularly where AI materially affects candidates or clients.

This may include explaining:

- That AI has been used.
- The purpose of its use.
- The role of human oversight in decision-making.

## **10. Use of AI by Third Parties**

Suppliers, technology partners, and service providers engaged by Apex Resource Management Ltd must:

- Use AI responsibly and lawfully.
- Comply with applicable data protection, equality, and employment laws.
- Be transparent about their use of AI where it impacts our services.

AI-related risks should be considered during procurement, contracting, and supplier management processes.

## **11. Governance and Approval**

Any proposed new or materially different use of AI must be approved by senior management and, where appropriate, in consultation with:

- Data protection and information security advisors.
- Legal or compliance advisors.

Managers are responsible for ensuring that their teams understand and comply with this policy.

## **12. Training and Awareness**

Apex Resource Management Ltd will support staff by providing guidance and training on the responsible use of AI, including risks, limitations, and best practice.

Employees are expected to use AI tools responsibly and raise concerns or questions where uncertainty exists.

## **13. Review**

This policy will be reviewed periodically to ensure it remains current, effective, and aligned with legal, regulatory, and technological developments.

**Document Control – Change History**

<b>Version</b>	<b>Date</b>	<b>Description of Changes</b>	<b>Author</b>	<b>Approver</b>