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M31 RESEARCH • POLICY DOCUMENT

ARTIFICIAL INTELLIGENCE (AI) USE POLICY

M31 Research's commitment to the responsible, ethical, and secure use of artificial intelligence

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1. Purpose

This policy sets out M31 Research's commitment to the responsible, ethical, and secure use of artificial intelligence (AI) tools across its research and operations. It exists to enable staff to benefit from AI productively while protecting data, research integrity, client confidentiality, and the rights of research participants, and ensuring compliance with applicable laws and client requirements.



2. Scope

This policy applies to the use of AI tools in connection with M31 Research work, in every country in which we operate. It covers generative AI, machine learning, and automated decision tools, whether third-party or developed in-house. The table below summarises who and what it covers.

Applies to	Does not apply to
All M31 Research employees, associates, consultants, enumerators and field teams, interns, and volunteers who use AI tools in connection with M31 Research work, and all such AI tools.	Personal use of AI unrelated to M31 Research work. AI features embedded in approved software remain subject to this policy's data rules. Third-party processors are covered through their agreements.



3. Definitions

Term	Definition
Artificial intelligence (AI)	Computer systems that perform tasks normally requiring human intelligence, such as understanding language, recognising patterns, or generating content.
Generative AI	AI that creates new content (text, images, code, or audio) from prompts, such as large language models.
AI tool	Any software or service that uses AI, whether standalone, embedded, third-party, or developed in-house.
Prompt / input	Information provided to an AI tool in order to obtain a result.
Output	Content generated by an AI tool.
Personal data	Information relating to an identified or identifiable individual, as defined in the Data Protection and Confidentiality Policy.
Hallucination	A confident but false or fabricated output produced by an AI tool.



4. Policy Statement

M31 Research is committed to the following principles:

- Use AI tools to enhance, not replace, professional judgment, and remain fully accountable for all work products.
- Use only approved AI tools for M31 Research work, and use them in line with this policy and the tool's terms.
- Never input personal, sensitive, confidential, or client and project data into AI tools that are not approved and contractually secured for that purpose.
- Protect research integrity by verifying AI outputs for accuracy, bias, and fabrication before use.
- Respect intellectual property, avoid plagiarism, and never present AI-generated content as original primary research.
- Be transparent about the material use of AI with clients and in deliverables where required.
- Avoid using AI in ways that could discriminate against or harm research participants or communities.
- Comply with data protection, confidentiality, and client or donor requirements when using AI.
- Maintain human oversight of any AI-assisted decision affecting individuals.



5. Roles & Responsibilities

Role	Responsibility
Leadership / Board	Accountable for this policy. Approves AI tools and resources, and reviews AI-related risks.
Policy Owner	The Managing Director owns and maintains this policy, maintains the approved-tools list, oversees compliance, and reports to the Board.
Managers	Project leads and managers ensure appropriate and compliant AI use on their projects, check client requirements, and review AI-assisted outputs.
All Staff	Use only approved tools, protect data, verify outputs, disclose AI use where required, and complete training.
IT / Data Protection Focal Point	Assesses and approves AI tools, manages data security and access, and advises on compliance.



6. Procedures

1. Use only AI tools on M31 Research's approved-tools list, and request approval before adopting a new tool.
2. Before using a tool, confirm what data it processes and where, and never enter personal, sensitive, confidential, or client data into an unapproved tool.
3. Treat AI outputs as drafts: review, fact-check, and edit them, and verify any citations or data.
4. Check outputs for bias, fairness, and potential harm, especially where they affect research participants or communities.
5. Disclose the material use of AI in deliverables where the client requires it, and follow any client AI policies.
6. Keep human oversight and a final human decision for any AI-assisted decision affecting individuals.
7. Report AI-related incidents, such as data exposure or harmful output, through the incident reporting procedure.
8. Complete AI awareness and responsible-use training.



7. Compliance & Monitoring

Compliance with this policy is mandatory. M31 Research will monitor adherence through:

- maintenance and review of the approved AI tools list and access controls;
- the inclusion of AI-use and data checks in project quality reviews;
- review of AI-related incidents and training completion.
- Breaches may result in disciplinary action up to and including termination of employment or contract. Entering confidential or personal data into an unapproved AI tool is treated as a data protection breach and handled under the Data Protection and Confidentiality Policy.



8. Related Documents

- M31 Research Data Protection and Confidentiality Policy
- M31 Research Information Security Policy
- M31 Research Code of Conduct and Ethics Policy
- M31 Research Incident Reporting Policy
- Zambia Data Protection Act No. 3 of 2021, and equivalent legislation in other countries of operation
- EU General Data Protection Regulation (GDPR) and emerging AI regulation such as the EU AI Act, where applicable
- Client and donor AI and data requirements



9. Review

This policy will be reviewed every 12 months, or sooner if circumstances change. Given the fast pace of change in AI, M31 Research will keep this policy and its approved-tools list under active review.



10. Contact

Questions about this policy?

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