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Introduction

Rural Media recognises the transformative potential of artificial intelligence (AI) in enhancing our charitable media operations while acknowledging the ethical considerations and responsibilities that come with its use. As a Herefordshire-based charity, production company and digital creative centre comprised of Rural Media Charity (RMC), Rural Studios (RS) and StoryPoint, we are committed to using technology in ways that align with our mission to tell powerful stories from unheard voices and nurture creative talent.

This policy aims to provide clear guidance on how different AI technologies should be used within our organisation, ensuring alignment with our values of Creative Excellence, Diversity, Equality & Inclusion, Authenticity, Partnership & Collaboration, and Environmental & Future Responsibility.

Purpose and Scope

This policy applies to all staff, volunteers, trustees, contractors and participants working with or on behalf of Rural Media across all our operational divisions. It covers all AI systems and tools used in activities related to our charitable operations, content production, audience engagement, educational programmes, commercial projects, and decision-making processes within the Rural Digital Media Centre.

AI Guiding Principles

Our approach to AI use is guided by the following principles, which align with our organisational values:

- Copyright Protection: We will ensure any media content we use is protected from being
 used illegally in contravention of UK copyright law. We will prioritise the use of closed
 source programmes and ensure any generative content undergoes a stringent review
 and quality assurance process to ensure it meets our standards for accuracy, relevance,
 and artistic integrity.
- 2. Freelancers and artistic talent: Rural Media is committed to supporting freelancers and artists, and we recognize the potential threat AI poses to creative livelihoods. We will continue to prioritize hiring freelance professionals, especially during production. While exploring AI tools to enhance our staff's creative development and post-production capabilities, our goal is to secure more projects and ultimately create more opportunities for freelance talent, strengthening our commitment to supporting rural economies.

- 3. **Talent Development Human Creativity First**: We recognize Al's creative possibilities but firmly believe it cannot replace human creativity. We will continue our training in traditional media and arts craft skills while supporting new talent to understand how Al can enhance their creative work and processes.
- 4. **Transparency**: We believe there should be transparency over the use of generative AI tools within the production process. For image, video and audio content we will always reference where AI has been used to generate content.
- 5. **Social Impact**: We strive to use AI in ways that promote cultural understanding, inclusion, and accessibility, supporting our commitment to Diversity, Equality & Inclusion, and empowering underserved individuals and communities. We will be mindful of the potential impact of automation on our workforce and commit to supporting staff in developing the skills needed to work effectively with AI.
- 6. **Bias Mitigation**: We take proactive steps to identify and mitigate biases in AI systems through human oversight, ensuring our work doesn't perpetuate prejudice against the disadvantaged groups we serve. We will be alert to the risk of AI-generated content creating a misleading or unbalanced interpretation of art, history, or culture.
- 7. **Environmental Sustainability**: We aim to use AI efficiently, avoid computational waste, and prefer AI providers with strong environmental credentials, aligning with our value of Environmental & Future Responsibility.

Full Policy

Types of AI and Usage Guidelines

1. Generative AI Systems

Definition: Systems that can create new content including text, images, audio, and video.

Examples: ChatGPT, DALL-E, Midjourney, Claude, Stable Diffusion, Runway, ElevenLabs

Appropriate Uses at Rural Media:

- Idea generation and creative brainstorming for projects with disadvantaged communities
- First drafts of non-critical content for Rural Studios' commercial campaigns
- Translation assistance for work with diverse linguistic communities
- Transcription assistance for accessibility in our media projects
- Administrative document preparation for the Rural Digital Media Centre
- Enhancing staff creative development and post-production capabilities
- Supporting educational workshops at the Rural Digital Media Centre
- Creating accessible versions of content for those with disabilities

Restrictions:

- Must disclose AI involvement in all public-facing creative works, maintaining our value of Authenticity
- Human review required for all Al-generated content prior to publication, especially for sensitive community stories
- Al-generated images of real people, rural communities, or marginalised groups must be clearly labelled as synthetic
- No generation of content that misrepresents actual events or quotes from community members
- No use that undermines creative professionals we work with, especially local talent
- Will not replace hiring of freelance professionals, especially during production
- Prioritise closed source programmes with proper licensing
- No AI-generation of content depicting or representing Gypsy, Roma, and Traveller communities, homeless young people, or other vulnerable groups without specific approval and oversight

2. Analytical AI Systems

Definition: Systems that analyse data, identify patterns, and provide insights.

Examples: Recommendation systems, audience analytics tools, predictive modelling platforms

Appropriate Uses at Rural Media:

- Audience analysis to better reach underserved rural communities
- Content performance evaluation for BBC and Channel 4 productions
- Operational efficiency improvements across our three divisions
- Resource allocation optimisation for the Rural Digital Media Centre
- Identifying underserved audiences in rural and isolated areas
- Supporting project acquisition to create more opportunities for local freelance talent
- Impact measurement for our work with disadvantaged groups
- Tracking the effectiveness of social justice campaigns
- Improving reach to communities experiencing prejudice and discrimination

Restrictions:

- No processing of personal data from vulnerable participants without appropriate consent
- No fully automated decision-making on matters affecting individuals or communities we serve
- No using insights to manipulate vulnerable audiences or misrepresent community voices
- Algorithmic recommendations must be regularly audited for bias against rural and disadvantaged groups
- Avoid systems that create misleading or unbalanced interpretations of rural life or the experiences of marginalised communities
- No use of data analytics that could further isolate disadvantaged rural communities
- Analytical outputs must be interpreted with consideration for rural contexts and specific community needs

Compliance Requirements:

- Full compliance with UK GDPR and Data Protection Act 2018
- Regular impact assessments for high-risk processing, especially concerning vulnerable groups
- Maintenance of data processing records accessible to all relevant stakeholders
- Clear data retention and deletion policies aligned with our organisational governance
- Regular bias audits with human oversight from diverse perspectives
- Environmental impact assessment of AI computational requirements
- Compliance with Arts Council England and other funders' requirements for data usage
- Alignment with our values of Diversity, Equality & Inclusion in all analytical processes

3. Workflow Automation Al

Definition: Systems that automate routine tasks and workflows.

Examples: Email automation, document processing, scheduling tools, content management systems with AI features

Appropriate Uses at Rural Media:

• Routine administrative processes across our three divisions

- Content distribution and scheduling for social media campaigns
- Technical quality control for Rural Studios' broadcast productions
- Basic customer service responses for the Rural Digital Media Centre
- Resource management for equipment loans and studio bookings
- Automating subtitling and accessibility features for our content
- Streamlining project management for complex multi-partner initiatives
- Improving digital accessibility for rural communities with limited connectivity
- Facilitating collaborative workflows between remote team members and rural participants

Restrictions:

- Must maintain human oversight for all automated processes, especially those affecting community participants
- Must include manual review triggers for exceptions and sensitive communications
- No automation of communications with vulnerable participants in our programmes
- No automation of creative decision-making processes that impact project quality
- Must be regularly tested for accuracy, reliability, and alignment with our values
- No automation that reduces meaningful human interaction with the communities we serve
- Automated processes must not create barriers for digitally excluded participants

Compliance Requirements:

- Clear documentation of all automated processes visible to relevant team members
- Regular review of automated decision trees for bias or accessibility issues
- Accessible override mechanisms for all automated processes
- Regular staff training on automation tools and their limitations
- Assessment of environmental impact from continuous automated processes
- Compliance with accessibility standards for all automated public-facing systems
- Regular consultation with community representatives about automated systems that affect them

4. Al for Accessibility

Definition: All systems specifically designed to improve accessibility of media content and services.

Examples: Automatic captioning, audio description tools, text simplification, sign language avatars

Appropriate Uses at Rural Media:

- Creating accessible versions of content for participants with disabilities
- Improving service access for disabled users of the Rural Digital Media Centre
- Developing more inclusive media experiences for isolated rural communities
- Real-time accessibility support during workshops and events
- Enhancing access to our broadcast content for diverse audiences
- Supporting participants with learning disabilities in creative expression
- Reducing barriers to participation for digitally excluded communities
- Improving accessibility of our websites and digital platforms
- Facilitating participation from remote rural locations

Restrictions:

- Must not replace professional access services without validation by users with relevant disabilities
- Must be regularly tested with target user groups from our communities
- Must include feedback mechanisms for improvement directly from affected participants
- Must meet relevant accessibility standards and UK legal requirements
- Must not create misleading representations of disability experiences
- Must be designed with input from the communities they are intended to serve
- Accessibility solutions must be tested in rural contexts with limited connectivity

Compliance Requirements:

- Compliance with Equality Act 2010 and Public Sector Bodies Accessibility Regulations
- Adherence to Web Content Accessibility Guidelines (WCAG) 2.1 Level AA
- Documentation of accessibility features and limitations for each tool

- Regular consultation with accessibility experts and users with disabilities
- Alignment with our value of Diversity, Equality & Inclusion
- Transparency about AI involvement in accessibility solutions
- Regular review of effectiveness for rural and disadvantaged users
- Consideration of digital exclusion factors in accessibility provision

Implementation and Compliance

Governance Structure

- Al Ethics Committee: Cross-departmental team from RMC, RS and RDMC that oversees policy implementation and addresses complex use cases
- **Data Protection Officer**: Ensures compliance with data protection regulations across all three divisions
- Departmental Heads: Responsible for policy adherence within their teams and projects
- **Al Champions**: Staff members with specialised knowledge to guide others, particularly in community-facing contexts
- **Community Representatives**: Consulted on Al implementations that directly affect the communities we serve
- **Creative Freelancer Liaison**: Ensures AI implementation supports rather than threatens freelance opportunities

Training and Talent Development

- All staff using AI tools must complete basic training on this policy
- Continued training in traditional media and arts craft skills for staff and participants
- Support for new talent to understand how AI can enhance creative work and processes
- Specialised training available for specific AI applications across our three divisions
- Regular updates on emerging AI capabilities and risks relevant to rural media production
- Access to expert advice for new AI use cases in our community projects
- Skills development to help staff work effectively with AI while maintaining our values
- Focus on using AI to strengthen our local creative economy and create opportunities
- Training programmes for young people at the Rural Digital Media Centre
- Workshops for freelancers on how to complement their skills with AI capabilities

- Support for digitally excluded communities to access and benefit from AI tools
- Emphasis on using AI to empower rather than replace human creativity

Risk Assessment

- New AI applications must undergo assessment covering:
- Data protection implications for vulnerable community participants
- Potential biases and fairness concerns, particularly regarding rural and marginalised communities
- Accuracy and reliability in representing diverse rural experiences
- Transparency and explainability to non-technical community members
- Environmental impact and computational efficiency aligned with our sustainability values
- Value alignment with our organisational mission and the needs of the communities we serve
- Impact on freelance creative professionals and artists in our local economy
- Copyright and intellectual property considerations for creative works
- Quality assurance metrics for artistic integrity and authentic representation
- Potential for reinforcing unbalanced cultural interpretations of rural life
- Accessibility implications for digitally excluded or disabled participants
- Effects on meaningful human connection in community-based projects
- Alignment with funder requirements and charitable objectives

Documentation Requirements

- Register of AI tools and applications in use across RMC, RS and StoryPoint
- Records of data used to train or fine-tune AI systems, especially when using communitygenerated content
- Documentation of Al involvement in published work and broadcast productions
- Regular audit reports on AI systems performance and alignment with our values
- Impact assessment for AI applications on freelance opportunities
- Environmental impact metrics for AI use across our operations
- Documentation of community consultation regarding AI implementation
- Records of Al-related training provided to staff and participants

- Evidence of quality assurance processes for AI-generated content
- Transparency records for public disclosure of AI use

Review Process*

- This policy will be reviewed annually by representatives from all three divisions of Rural Media, or sooner if appropriate, to ensure it remains relevant as AI technologies and best practices evolve. The review will specifically assess:
 - Alignment with our core values of Creative Excellence, Diversity, Equality & Inclusion, Authenticity, Partnership & Collaboration, and Environmental & Future Responsibility
 - Effectiveness in supporting our mission to tell powerful stories from unheard voices
 - Impact on freelance opportunities and the local creative economy
 - Feedback from community participants and stakeholders
 - Compliance with evolving legal and regulatory frameworks
 - o Emerging ethical considerations in AI use in the cultural sector
 - o Environmental sustainability of our AI implementation
 - o Effectiveness in enhancing accessibility and inclusion