

# *Artificial Intelligence Policy*

*July 2026*



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Pension Authority No: PB67866 Revenue Approval No: SF7346

**PENSION TRUSTEES:** Mr. James Skehan (Chairman and Professional Trustee); Mr. John McHugo (Vice Chairman); Ms. Pauline Brennan; Mr. Francis Coughlan; Ms. Deirdre Herlihy and Mr. Bernard O'Regan.

## 1. Purpose of Policy:

The purpose of this Artificial Intelligence policy (the Policy) is to outline the Trustees current policy with respect to the use of artificial intelligence (AI) within the Scheme. This policy permits limited AI use for support activities only.

This policy ensures compliance with Irish and EU law, protects member interests, and maintains trust in our operations. The Trustees believe that they are a “deployer” of AI as per the EU’s AI Act (Regulation (EU) 2024/1689). The Trustees main obligations as a deployer are covered below – prohibited use cases, transparency and training.

## 2. Scope and Applicability:

The Trustees current position on what AI can be used for:

- **In Scope:** Use of AI tools for drafting policies, generating reports, or analysing non-personal data (e.g., market trends, regulatory changes).
- **Out of Scope:** Use of AI for processing personal data, making decisions about individual members, or automating member communications without human oversight.

This policy applies to the Trustees and the Pension Scheme Manager. The Trustees will incorporate similar requirements into contracts and agreements with the service providers to the Scheme.

## 3. Principles:

The Trustees have established the following principles to be applied to use AI:

### A. Transparency

- Any AI-assisted content (e.g., policy drafts, reports) must be clearly labelled as such.
- Staff must disclose the use of AI tools in internal documentation.

### B. Accountability

- Ultimate responsibility for AI-assisted outputs rests with the Trustees.
- AI outputs must be reviewed and approved by a human before use.

### C. Data Protection

- AI tools must not process personal data of members, Trustees, or staff.
- Only anonymised, aggregated, or non-personal data may be used with AI tools.
- Compliance with GDPR and the Irish Data Protection Act 2018 is mandatory.

### D. Security & Confidentiality

- AI tools must be vetted for security and compliance before use.
- Sensitive or confidential information must not be input into public or unapproved AI tools.

### E. Compliance & Ethics

- AI use must comply with all relevant laws, regulations, and any guidance from the Pensions Authority.
- AI tools must not be used in ways that could lead to bias, discrimination, or unfair outcomes.

#### 4. **Approved AI Tools:**

The Trustees may approve AI tools after receiving recommendations for an AI Tools adoption from the Data Protection Team and any usage guidance. The approved list of AI tools is maintained in Appendix 1 to this document.

Additional tools may be approved and added to Appendix 1 after approval by a meeting of the Trustees. The updated Appendix 1 may be included in the minutes of the meeting and the AI Policy updated accordingly at the next scheduled review of the AI Policy.

#### 5. **Approved Use Cases:**

The use of AI is currently limited to supporting policy drafting, administrative tasks, and non-personal data analysis.

The Trustees have approved the following examples where AI is permitted or not to be used:

| Use Case                                                                    | Permitted | Conditions                                                                                                                                 |
|-----------------------------------------------------------------------------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------|
| Drafting or editing internal policies, procedures, meeting minutes, agendas | Yes       | Human review and approval required                                                                                                         |
| Analysing non-personal market or regulatory data                            | Yes       | Data must be anonymised/aggregated                                                                                                         |
| Generating reports or summaries                                             | Yes       | Clear labelling of AI assistance                                                                                                           |
| Templates for general member communications                                 | Yes       | Human review and approval required                                                                                                         |
| Recording (video and/or audio) of meetings                                  | Yes       | With the consent of <b>all</b> people attending                                                                                            |
| Meeting transcription & production of minutes                               | Yes       | Consent of all of the people attending and AI tool may be admitted to the meeting and transcription allowed in real time without recording |
| Translation of languages                                                    | Yes       | Data must be anonymised/aggregated                                                                                                         |

#### 6. **Prohibited Use Cases:**

The Trustees have prohibited the following examples where AI is not to be used:

| Use Case                                                             | Permitted | Reason for prohibition                                                                                                  |
|----------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------|
| Processing or analysing personal data of members, trustees, or staff | No        | Personal data is disclosed to the AI that may then be used for AI model training and disclosed to external parties      |
| Automated decision-making affecting individual members               | No        | The Trustees policy is that any automated processing must ensure that appropriate safeguards are implemented            |
| Using AI tools that have not been approved by the Scheme's Trustees. | No        | Trustees will only approve AI tools that have been proven to use data for Scheme's own purposes and not train AI models |
| Individual member communications                                     | No        | All individual member communications must be human-authored and data security maintained                                |

## **7. Roles and Responsibilities:**

The Trustees have determined the following roles and responsibilities:

- The Trustees are responsible for ensuring that AI usage aligns with this Policy and regulatory requirements, ensuring appropriate training on responsible AI use and this Policy.
- The Data Protection Team are responsible for assessing and recommending the approval of AI tools to the Trustees, monitor compliance and address data protection concerns.
- AI Users (Trustees, Pension Scheme Manager and Service Providers) are responsible for using AI tools only as permitted, label AI assisted outputs and report concerns and incidents.

## **8. Breaches of Policy:**

All breaches of this Policy must be reported to the Data Protection Team in accordance with the Scheme's Data Incident Response Procedure. The Data Protection Team will co-ordinate the Scheme's response and inform the Trustees.

## **9. Legal Standing:**

This Policy is not, nor is it intended to be, a legal document and is not intended to have legal effect or to be legally binding on the Trustee Board, nor to override the Trust Deed & Rules of the Scheme.

The Trustees reserve the right at all times to depart from the terms of this Policy as it sees fit; for example, to accommodate a particular set of circumstances or a changing of views. Any departure will be exceptional, documented and approved by the Trustees.

## **10. Policy Review:**

This policy shall be reviewed at least annually. This is due to fast advancing pace of change within the field of artificial intelligence.

The findings of this review will be documented and any amendments to the Policy will be reflected in an updated Artificial Intelligence Policy. As noted above, Appendix 1 may be updated following a Trustee meeting and maintained independently until the next review of this Policy.

End

**Approval and Next Review Date of this Policy:**

This document was approved and came into effect as follows:

| Document Control   |                                                                                                                                                               |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Approved By:       | Mr. James Skehan,<br>Pension Scheme Chairman and Professional Trustee,<br>National Federation of Voluntary Service Providers' Pension & Life Assurance Scheme |
| Approved By:       | Mr. John McHugo,<br>Vice Chairman,<br>National Federation of Voluntary Service Providers' Pension & Life Assurance Scheme                                     |
| Date approved:     | 30 <sup>th</sup> July, 2026                                                                                                                                   |
| Next review date:  | July 2027                                                                                                                                                     |
| Previous versions: | n/a                                                                                                                                                           |

**Signed:**

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**James Skehan,  
Chairman & Professional Trustee.**

**Date: 30<sup>th</sup> July, 2026****Signed:**

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**John McHugo,  
Vice Chairman.**

**Date: 30<sup>th</sup> July, 2026**

## Appendix 1 – Approved AI Tools

The list of approved AI tools at date of approval of this Policy is the following

| AI Tool            | Trustee meeting approved   | Usage Guidelines                                                               |
|--------------------|----------------------------|--------------------------------------------------------------------------------|
| Microsoft Co-Pilot | 30 <sup>th</sup> July 2026 | No personal member or beneficiary data or Scheme specific data to be uploaded. |
|                    |                            |                                                                                |
|                    |                            |                                                                                |
|                    |                            |                                                                                |