

To: Members
Dunwoody City Council

From: Ginger LePage
Technology Director

Re: AI Policy
Date: 8/24/2026

Action

Adopt the attached Artificial Intelligence (AI) Policy for the City of Dunwoody effective immediately.

Summary

The proposed AI Policy is a set of guidelines drafted with the legal team to establish clear rules and guidelines for the responsible, ethical, transparent, and lawful use of AI Tools.

Details

This proposed AI Policy was developed with the legal team. It applies to all Artificial Intelligence utilized by City Staff, including Generative AI such as ChatGPT, Microsoft Copilot and Google Gemini (as some examples). This policy will work in tandem with the current Technology Policy. The policy covers the following principles:

- * Public trust and accountability
- * Lawfulness and transparency
- * Fairness and non-discrimination
- * Data protection and security
- * Human oversight

Once adopted, the Technology Department will begin working with City Staff to ensure everyone is offered training on the policy.

Recommendation

Adopt the attached AI Policy for the City of Dunwoody effective immediately.

ARTIFICIAL INTELLIGENCE USE POLICY

CITY OF DUNWOODY, GEORGIA

1. Purpose and Guiding Principles

Artificial intelligence (“AI”), including generative AI (“GenAI”) tools such as ChatGPT, Microsoft Copilot, and Google Gemini, can help the City of Dunwoody, Georgia (the “City”) deliver services more efficiently and responsively. At the same time, as a public employer accountable to residents, the City must ensure that its use of AI protects the public trust, safeguards constituent information, and complies with the laws that govern government operations.

The purpose of this Artificial Intelligence Use Policy (this “Policy”) is to establish clear rules and guidelines for the responsible, ethical, transparent, and lawful use of AI Tools (as defined below) by City personnel, while mitigating risks related to data privacy and security, accuracy, bias and discrimination, transparency, records retention, and public accountability.

The City is committed to the following principles in its use of AI Tools:

- **Public trust and accountability.** AI Tools are used to serve residents, and a human employee remains accountable for every action taken and every decision made with the assistance of an AI Tool.
- **Lawfulness and transparency.** The City’s use of AI Tools complies with applicable law and is disclosed where appropriate so that the public can understand how the City uses these technologies.
- **Fairness and non-discrimination.** The City takes reasonable steps to prevent AI Tools from producing biased, inaccurate, or discriminatory outcomes, particularly in decisions affecting residents and employees.
- **Data protection and security.** The City protects confidential, personal, and other nonpublic information from improper disclosure through AI Tools.
- **Human oversight.** Consequential decisions are reviewed and approved by qualified human personnel and are never delegated to an AI Tool.

All City personnel are responsible for using AI Tools in a productive, ethical, and lawful manner consistent with this Policy.

2. Definitions

For purposes of this Policy:

- **“Artificial Intelligence” or “AI”** means computer systems and technologies that perform tasks that ordinarily require human intelligence, including analyzing data, recognizing patterns, generating content, making predictions or recommendations, and supporting or making decisions.
- **“Generative AI” or “GenAI”** means AI technology, typically powered by large language models or similar algorithms, that generates text, images, audio, code, or other content in response to a user’s prompt or query.
- **“Automated Decision-Making System”** means any AI Tool used to make, or to materially assist in making, a decision affecting a member of the public or an employee, including decisions relating to benefits, licensing, permitting, enforcement, hiring, or discipline.
- **“AI Tools”** means all AI and GenAI systems and applications covered by this Policy, whether publicly available (such as ChatGPT), licensed to the City, or embedded in other software the City uses.
- **“City Personnel”** means all City employees, contractors, vendors, temporary staff, and any other individual with authorized access to City-owned or managed technology resources (that is, all “Users” as defined in the City’s Technology Policy), as well as to elected and appointed officials, volunteers, and interns acting on the City’s behalf.
- **“Consequential Decision”** means a decision that materially affects an individual’s rights, benefits, opportunities, employment, legal status, access to government services, or financial interests.
- **“Nonpublic Information”** means any information that is not a public record available for release, including personally identifiable information (PII), protected constituent and employee data, Criminal Justice Information Services (CJIS) data and other law enforcement and investigatory records, information protected by attorney-client privilege, draft procurement documents, and any information whose disclosure is restricted by law.

3. Scope of Policy

This Policy applies to all City Personnel when using AI Tools in the course of City business, including in dealings with third-party agents, contractors, and vendors, and when using a

personal device to conduct City business. It applies whether the AI Tool is accessed through a City or personal account, device, or system.

This Policy supplements, and does not replace, any more specific rules governing particular departments (for example, the Dunwoody Police Department, the City Attorney's Office, and Human Resources, which may impose additional restrictions on the use of AI Tools). Where a department rule is more restrictive, the more restrictive rule controls.

4. Compliance with Applicable Law

The City's use of AI Tools must comply with all federal, state, and local laws that govern the City and its operations. City Personnel remain responsible for compliance with these laws when using AI Tools, including:

- **Public records laws.** Information entered into, and content generated by, an AI Tool may constitute a public record subject to the Georgia Open Records Act, O.C.G.A. § 50-18-70 *et seq.*, and to the records retention requirements of the Georgia Records Act, O.C.G.A. § 50-18-90 *et seq.*, and the local government retention schedules maintained by the Georgia Archives. City Personnel must create, preserve, and produce these records as required by law and must not use AI Tools in a manner that circumvents public records or retention obligations.
- **Open meetings laws.** AI Tools must not be used to conduct or facilitate deliberations among a quorum of the City Council or any other agency of the City in a manner that circumvents the Georgia Open Meetings Act, O.C.G.A. § 50-14-1 *et seq.*
- **Civil rights and equal employment laws.** The City's use of AI Tools must comply with all applicable anti-discrimination and equal employment opportunity laws and with the City's Equal Employment Opportunity (EEO) and No Harassment policy, including but not limited to Title VII of the Civil Rights Act, the Americans with Disabilities Act, the Age Discrimination in Employment Act, the Genetic Information Nondiscrimination Act, and any applicable City of Dunwoody or DeKalb County ordinance. AI Tools must not be used in a manner that results in unlawful treatment based on race, color, religion, sex (including pregnancy, sexual orientation, and gender identity or expression), national origin, age, disability, citizenship status, military or veteran status, genetic information, or any other classification protected by applicable law.
- **Due process and equal protection.** AI Tools must not be used in a way that deprives any person of constitutional or statutory due process or equal protection rights in benefits, employment, enforcement, licensing, or similar determinations.

- **Data privacy and security laws.** The City's use of AI Tools must comply with applicable data privacy and security laws, including Georgia's data breach notification requirements, O.C.G.A. § 10-1-910 *et seq.*, and, if and where applicable, the Health Insurance Portability and Accountability Act (HIPAA), the Criminal Justice Information Services (CJIS) Security Policy governing law enforcement data, the IRS Publication 1075 safeguards, and the Family Educational Rights and Privacy Act (FERPA).
- **AI-specific laws and guidance.** The City's use of AI Tools must comply with any applicable State of Georgia or City of Dunwoody law, executive order, or guidance governing the government use of AI, including any guidance issued by the Georgia Technology Authority.

This Policy also supplements, and does not replace, the City's other applicable policies, including the Employee Handbook, the Technology Policy (including its Acceptable Use, Account Management, and Technology Security provisions), the Code of Ethics and Conduct, and the Equal Employment Opportunity (EEO) and No Harassment policy. This Policy governs the use of AI Tools specifically and supersedes any prior AI-specific provisions of the Technology Policy; all other provisions of those policies remain in full force and effect, and where the Technology Policy imposes a more specific technical or security requirement, that requirement continues to apply.

5. Permitted Uses

City Personnel may only use AI Tools that have been pre-approved by the City and do so only on City-issued devices.

Only AI Tools acquired through the City's purchasing policy and in compliance with the City's technology policies, both as amended if any, shall be permitted for use by City Personnel. Any AI Tool not compliant with this policy shall be prohibited, unless specifically authorized by the Technology Director in writing. In addition, City Personnel may not use a personal AI account, subscription, or workspace to conduct City business unless specifically authorized by the Technology Director, in writing.

Subject to the requirements of this Policy, City Personnel may use approved AI Tools to assist with tasks such as:

- Analyzing and summarizing data and documents;
- Drafting correspondence, memoranda, reports, and presentations;
- Brainstorming ideas;

- Creating outlines, checklists, and templates;
- Conducting preliminary research; and
- Creating formulas for Excel spreadsheets or similar programs.
- Developing or debugging code, to be verified before deployment.

Any use of an AI Tool for a purpose not authorized above must be authorized in advance by the City Manager or designee, in coordination with the Technology Department.

The City reserves the right to monitor all use of AI Tools on City systems and accounts. Users should have no expectation of privacy in City-authorized AI Tool use conducted on City devices, systems, accounts, or networks, to the extent permitted by law.

6. Requirements for Using AI Tools

When using AI Tools, all City Personnel must:

- Use only AI Tools that have been approved by the Technology Department and, where the City provides one or specifies its use, use a City-provided account and email address to access the AI Tool. In addition, City Personnel may not use a personal AI account, subscription, or workspace to conduct City business unless specifically authorized by the Technology Department.
- Never enter Nonpublic Information into a prompt or query for a publicly available or unsecured AI Tool. This includes personally identifiable information; private or personal constituent or employee data; CJIS and other law enforcement data; restricted-use or federally regulated data; trade secrets and proprietary vendor information; draft requests for proposals; vendor transactions and procurement approvals; internal deliberations and decisions; and any other information not subject to public release, unless the specific tool has been approved by the Technology Department for that data and use is authorized in advance.
- Before entering any information into an AI Tool, sanitize it by redacting sensitive data and generalizing City-specific details (for example, use “Police Department” rather than “Dunwoody Police,” and remove individual names, dates of birth, and other identifying information).
- Not use AI Tools to create or distribute offensive, discriminatory, harassing, retaliatory, or otherwise inappropriate content.
- Thoroughly review and verify every AI Tool output before using it, relying on it, publishing it, or forwarding it inside or outside the City, in order to:

- verify the accuracy of any facts, figures, citations, or sources, recognizing that GenAI Tools can produce confident but false or fabricated content;
 - ensure the output does not contain biased, discriminatory, or inappropriate content; and
 - ensure the output does not improperly use or disclose Nonpublic Information or infringe the rights of others.
- Review AI Tool output for third-party copyrighted or trademarked material, properly attribute or obtain rights to any such material before use, and remove material that cannot be lawfully used.
 - Retain and document their use of AI Tools as required by the City's records retention obligations, including preserving prompts and outputs that constitute public records.
 - Understand, to a reasonable degree, how an AI Tool works, its limitations, and the terms of use and privacy terms governing the tool's handling of information the City submits.

7. Prohibited Uses

City Personnel are prohibited from using AI Tools to:

- Conduct, solicit, or facilitate any unlawful activity;
- Engage in or promote discriminatory, harassing, retaliatory, or unethical practices;
- Enter Nonpublic Information into a publicly available or unsecured AI Tool;
- Infringe the rights of others, including privacy and intellectual property rights;
- Generate the final, unreviewed basis for any consequential decision affecting a member of the public or an employee (see Section 8);
- Circumvent public records, records retention, or open meetings obligations; or

8. Human Oversight of Consequential Decisions

AI Tools may support, but must never replace, human judgment in decisions that affect the rights, benefits, or obligations of residents or employees. For any decision made by an Automated Decision-Making System or with the material assistance of an AI Tool, including but not limited to determinations relating to public benefits, licensing, permitting, code enforcement, public safety, or employment, a qualified human employee must independently review the relevant facts, exercise independent judgment, and approve the

decision before it takes effect. That employee, not the AI Tool, is accountable for the decision. AI Tools must not be used as a substitute for direct human interaction with residents where such interaction is expected, or to draft sensitive communications without human review.

9. AI in Employment Decisions

The City's use of AI Tools in recruiting, hiring, evaluation, promotion, discipline, or other employment decisions must comply with all applicable equal employment opportunity and anti-discrimination laws. Before any AI Tool is used to make or materially assist in an employment decision, the Human Resources Director, in consultation with the City Attorney, must review and approve the tool, and the tool's use must be assessed for disparate impact and bias. No employment decision may be based solely on AI Tool output without meaningful human review.

10. Transparency and Disclosure

To maintain public trust, City Personnel should be transparent about the City's use of AI Tools:

- The City may require disclosure when AI-generated content is materially relied upon in a public communication or publication (for example, "This content was generated with the assistance of AI and verified by a City official").
- Where an AI Tool is used in making a decision affecting a member of the public, the City should disclose that use consistent with applicable law and any City transparency guidelines.
- Any use of AI Tools in preparing court filings must comply with applicable court and judges' rules on disclosure and certification of GenAI use.

11. Procurement and Approval of AI Tools

No AI Tool may be acquired, licensed, downloaded, or deployed for City use except through the City's established procurement and approval process. Before an AI Tool is approved, City Personnel must:

- Use the City's purchasing process and comply with the City's purchasing ordinance and, for any public works construction contract, the Georgia Local Government Public Works Construction Law, O.C.G.A. § 36-91-1 *et seq.*, when acquiring an AI Tool;
- Coordinate with the Technology Department to confirm system compatibility, data-handling terms, and security requirements; and

- Obtain City Attorney review of the vendor's terms of use, data ownership, data-retention, and training provisions, and their privacy and civil rights implications.

12. Security

Because AI Tools can create security risks for the City and its residents, City Personnel must:

- Obtain permission from the Technology Department before accessing any AI Tool for City business;
- Use only accounts established specifically for City work when using AI Tools;
- Assess an AI Tool's impact on the City's security and on constituents' privacy before use; and
- Secure and back up City data used with AI Tools, including AI-enabled third-party applications.

The City's Technology Department is responsible for regularly testing approved AI Tools for vulnerabilities, limiting access to AI Tools, and monitoring AI Tool activity on City systems.

City Personnel should have no expectation of privacy in City-authorized AI Tool use conducted on City devices, systems, accounts, or networks, to the extent permitted by law.

13. Intellectual Property and Ownership

Work product created by City Personnel using AI Tools in the course of City business belongs to the City to the fullest extent permitted by law. City Personnel must not enter third-party copyrighted, trademarked, or proprietary material into an AI Tool without authorization, and must review AI Tool output for third-party rights before use. City Personnel should be aware that content generated solely by a GenAI Tool may not be eligible for copyright protection.

14. Governance and Administration

The City Manager or designee, in coordination with the Technology Department, is responsible for administering this Policy and shall:

- Maintain the list of approved Technology, including those with AI components, and the process for approving new technology;
- Implement a process to monitor and document AI Tool use and to identify potential issues, biases, or errors;

- Keep accurate records of approvals, audits, and decisions under this Policy;
- Consult with the City Attorney on legal issues arising under this Policy and escalate matters to the City Manager and, as needed, the City Council; and
- Regularly review and update this Policy to reflect changes in technology, law, and best practices.

15. Mandatory Training

The Technology Department will provide training and resources to help City Personnel understand their obligations under this Policy. Any City Personnel who intend to use AI Tools must complete AI use training before doing so. Supervisors must ensure that their personnel complete all required training.

The City may deem failure to participate in required training a violation of this Policy. The City will retain attendance records and copies of training materials provided to City Personnel.

16. Reporting Non-Compliance

If you become aware of an actual or potential violation of this Policy, or have reason to believe that any of the following has been accessed, downloaded, or installed on the City's networks, systems, or devices, you must promptly report it to the Technology Department together with all relevant information:

- An AI Tool that has not been approved by the Technology Department;
- An AI Tool used outside its approved manner or scope;
- Entry of Nonpublic Information into a publicly available or unsecured AI Tool; or
- An AI Tool that poses an identified, unaddressed security risk or contains material defects or malicious code.

Concerns that an AI Tool has produced or contributed to discriminatory, harassing, or biased treatment of an employee or applicant should be reported under the City's Equal Employment Opportunity (EEO) and No Harassment policy. Consistent with that policy and the Employee Handbook, the City prohibits any form of reprisal, intimidation, or retaliation against a person for reporting a suspected violation in good faith or participating in an investigation.

17. Violations of This Policy

City Personnel who violate this Policy, regardless of position or title, are subject to disciplinary action up to and including immediate termination of employment, consistent with applicable law, the Employee Handbook's Rules of Conduct and Discipline, and the City's other personnel policies. Violations may also result in the loss of access to AI Tools and referral to appropriate authorities where the conduct may be unlawful.

18. Administration of This Policy

The City reserves the right to change, modify, or delete the provisions of this Policy at any time, subject to applicable law. The City Manager, after consultation with the Technology Director, may change, modify, or delete the provisions of this policy. A copy of any changes shall be provided to the Mayor and Council and filed in the office of the City Clerk and the Technology Department. The City Manager shall be responsible for administering all aspects of this Policy. Questions about this Policy or the use of AI Tools should be directed to the Technology Department or the City Manager's Office.

19. Effect on Employment Status

This Policy sets standards of conduct for the use of AI Tools. Consistent with the Employee Handbook, employment with the City is at-will, and nothing in this Policy creates an employment contract or other enforceable entitlement, alters the at-will status of any City employee, or modifies any term or condition of employment. Only a specific written agreement authorized by the City Manager may alter an employee's at-will status. Nothing in this Policy is intended to expand or diminish any right an employee may have under applicable law.

20. Conduct Not Prohibited by This Policy

This Policy is not intended to restrict or interfere with any communication or activity protected or required by law, including rights protected by the First Amendment and applicable whistleblower protection laws, such as reporting suspected unlawful conduct or cooperating with an investigation.

Acknowledgment of Receipt and Review

I acknowledge that on the date of my signature below, I received and read a copy of the City of Dunwoody, Georgia Artificial Intelligence Use Policy (the “Policy”) and understand that it is my responsibility to be familiar with and comply with its terms. I understand that the City may interpret, administer, change, modify, or delete this Policy at any time, subject to applicable law. This Policy sets forth standards of conduct for the use of AI Tools; it does not create a contract of employment or alter the terms or conditions of my employment.

Signature

Printed Name

Date