



Committee of the Whole

Meeting Date: November 26, 2024

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Subject: Artificial Intelligence (AI) Policy

BACKGROUND:

The adoption of artificial intelligence (AI) is transforming private and public services offering powerful tools for operational efficiency, data-driven decision-making, and enhanced service delivery.

With AI tools like ChatGPT, Microsoft Copilot, and Acrobat Pro, Middlesex County is leveraging available technology to maximize resources and improve services for all. However, as promising as AI is, its use also raises important considerations around privacy, accountability, and transparency. Developing a comprehensive AI policy allows the County to foster an environment that encourages innovation and confidently explore these new technologies while ensuring compliance with Ontario's Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), alongside other applicable legislation.

The Middlesex County AI Policy establishes a framework that fosters a responsible, transparent, and forward-thinking approach to AI. It addresses key areas such as privacy protection, data security, equity, and human oversight, ensuring AI systems serve community needs while protecting individual rights.

Through this policy, Middlesex County can advance its use of AI in a way that upholds the values of transparency, accountability, and ethical stewardship, ensuring that technology serves as a means to enhance community well-being.

ANALYSIS:

The Middlesex County AI Policy has been drafted using best practices in government AI governance, drawing on guidance from the [GovAI Coalition](#) and other leading frameworks such as [Canada's Directive on Automated Decision-Making](#). This ensures the policy

reflects global standards for transparency, accountability, and ethical AI use in public service. By incorporating requirements for Algorithmic Impact Assessments (AIAs), equity and bias mitigation, and public-facing transparency measures, the policy aligns with emerging trends in responsible AI adoption, positioning Middlesex County as a leader in ethical, innovative, and citizen-centered AI governance.

The Middlesex County AI Policy sets a strong foundation for enabling a culture of technological exploration and innovation. This policy provides not only operational guidelines but also a structured path for maximizing the potential of AI to streamline services, reduce costs, and improve access.

- The policy explicitly encourages County staff to explore AI applications that can drive efficiency and enhance service delivery. By establishing clear boundaries and a supportive framework, the policy empowers staff to leverage AI creatively, knowing that staff are doing so within an ethical and secure structure. This is a step toward building a culture where technology use is not only accepted but encouraged, fostering a forward-looking environment that maximizes the County's resources.
- Transparency is central to this policy. Middlesex County is committed to disclosing AI use in understandable terms, ensuring the public are aware of AI's role in decision-making and service provision. The policy's transparency measures include public-facing disclosure on the County's website.
- Protecting the privacy of resident data is paramount, and this policy is designed to uphold that protection rigorously. The policy mandates strict privacy protocols and data governance practices aligned with MFIPPA and PIPEDA requirements, ensuring that AI systems operate securely. By conducting Algorithmic Impact Assessments (AIAs) for all AI systems, the County ensures that data privacy and security risks are managed proactively.
- AI systems can amplify biases if not carefully managed, and this policy outlines an equity framework to mitigate such risks. By emphasizing fairness and requiring bias assessments, Middlesex County ensures that AI applications do not perpetuate inequalities, especially in decisions affecting marginalized communities. This commitment to equity reflects the County's dedication to providing fair and unbiased services to all residents.
- The County's AI Policy emphasizes that AI is a tool to support, not replace, human judgment. The policy mandates human oversight for all significant AI decisions impacting residents. Furthermore, the policy includes provisions for continuous monitoring and adaptation of AI systems, ensuring they evolve alongside emerging legal standards, technological advancements, and public expectations. This dynamic approach enables the County to remain agile, continuously improving its AI implementations as technologies develop.

Although the Delegation of Duties By-law No. 7263 permits staff to develop, approve, modify, and implement administrative policies, procedures, and practices, staff considered the importance of bringing this policy to Council for informational, educational, and transparency purposes. By presenting the AI Policy to Council, staff aim to foster a shared understanding of its goals, ensure alignment with the County’s strategic priorities, and reinforce the collective commitment to ethical, innovative, and transparent administration.




Middlesex County is already utilizing AI technologies in various capacities to enhance service delivery and operational efficiency. This policy has been developed to formalize the scope of AI use, establish guiding principles, and provide a framework that ensures these technologies are deployed ethically, transparently, and in alignment with the County’s strategic priorities.

FINANCIAL IMPLICATIONS:

By promoting a culture of innovation, the AI Policy positions Middlesex County to make better use of existing resources, ultimately driving operational efficiency and potential cost savings. Service areas can leverage AI to handle routine tasks more efficiently, freeing up staff resources for more complex or high-impact work.

ALIGNMENT WITH STRATEGIC FOCUS:

This report aligns with the following Strategic Focus, Goals, or Objectives:

Strategic Focus	Goals	Objectives
Cultivating Community Vitality 	Advance a diverse, healthy, and engaged community across Middlesex County	<ul style="list-style-type: none"> Innovate social and community services
Connecting Through Infrastructure 	Ensure communities are built on a sustainable foundation that is connected and thriving	<ul style="list-style-type: none"> Use County infrastructure in an innovative way to provide a seamless service experience for residents
Promoting Service Excellence 	Innovate and transform municipal service delivery	<ul style="list-style-type: none"> Anticipate and align municipal service delivery to emerging needs and expectations Build organizational capacity and capabilities

RECOMMENDATION:

THAT the Artificial Intelligence (AI) Policy Report be received for information;

AND THAT the Artificial Intelligence (AI) Policy be approved.