

Artificial Intelligence (AI) Usage Policy	
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SCOPE

This policy applies to all employees of Buffalo Toronto Public Media (“BTPM”).

PURPOSE

This policy outlines the principles, guidelines and expectations governing the development, deployment, and usage of Generative AI (gAI) as well as comply with guidelines outlined by partners such as PBS and NPR.

DEFINITIONS

gAI (Generative AI) – a type of artificial intelligence that uses machine learning to create new content like text, images, videos, audio, or other media outputs. This type of AI can be accessed from a variety of systems or applications (i.e. ChatGPT, Midjourney, ElevenLabs, etc.)

AI Systems/Applications – any software, hardware or platform that processes user-supplied data and information to perform tasks autonomously or semi-autonomously.

AI Hallucinations – incorrect or misleading outputs generated by an AI system, often due to errors in training data or limitations in the model’s ability to understand context.

Deepfakes – synthetic media, often in the form of images, videos or audio, that have been manipulated or generated by AI to convincingly appear real, often with the intent to deceive.

POLICY

This policy is designed to provide expectations for BTPM employees to follow if/when utilizing AI in their work. All works created using AI methods or technologies must adhere to this Policy and uphold BTPM’s mission, vision and core values. All employees are expected to completely verify AI output and findings and review them for accuracy during development and prior to executing or submitting final work.

BTPM staff are expected to use a “People First. People Last.” approach. This shall be a proactive quality control measure to ensure the human AI-user is touching all AI-generated content from beginning to end as well as being intertwined throughout its usage and development phase(s).

- I. Ethical Principles
 - A. Evaluate Bias and Source Integrity

- While gAI can aid in the creation of many different types of content, human judgement ensures that gAI content aligns with the organization's values and standards, preventing unintentional spread of misinformation, stereotypes, or reinforcement of societal and cultural biases that lead to marginalization and discrimination. Special care must be taken to proactively identify and mitigate biases.
- Validate, verify and ensure the accuracy and appropriateness of gAI's contributions to content and ensure that the original message, context, and factual accuracy of sources are not compromised by gAI contributions to content.
- AI usage should always align with editorial principles – editorial independence, accuracy, fairness, transparency, inclusiveness and accountability.

B. Constant Review and Remediation

- Regular reviews by the user(s) shall be conducted to assess and mitigate potential biases in AI algorithms and data sets. Every effort must be made to prevent the transmission of false information. In addition, the BTPM AI Governance Committee shall review and address any potential misuse, threats, challenges, or problems related to AI usage.
- Human oversight is essential to ensure that gAI content does not replace human creativity, emotion, nuance, and ethics of purposeful, human-driven content. Employees are expected to check, challenge and seek supervisory review and/or collaboration when using gAI.

II. Transparency and Disclosure

- AI usage should be transparent and, as defined herein, affected parties should be informed when they are interacting with or subject to decisions made by AI systems.
- BTPM shall disclose, as appropriate and to its discretion, to its audience when AI technologies play a significant role in content creation, curation or delivery. Employees are expected to follow guidelines defined within their specific department and role.
- When utilized internally, employees shall share and disclose to all necessary parties when AI technologies have been used.
- Where feasible, AI users should provide explanations for their decisions in a manner understandable to non-technical stakeholders.
- Externally, disclosure should be made in a clear, jargon-free manner indicating which part of the content were generated or influenced by AI. This should be treated as credits or citations, not disclaimers.

III. Accountability and Oversight

- Responsibility for AI outcomes rests with the user and their supervisor. Other members of management may be involved, as appropriate, for facilitation of projects and/or content development.

- In conjunction with BTPM's Code of Ethics and Standards of Employee Conduct, any unintended consequences or errors arising from the usage of AI, in any form, must be promptly reported to a member of management or People Operations. Matters will be addressed as appropriate.
- Critical decisions affecting legal rights, proprietary information, copyrighted material, safety, or other matters of significance including those that may require disclosure to various stakeholders, shall not be made solely by AI applications without appropriate human review.
- AI shall not replace human editorial judgement in content creation, news reporting, or programming decisions that require journalistic integrity.
- BTPM personnel have the authority to override AI decisions when deemed necessary.
- The AI Governance Committee shall provide a suggested list of AI tools, but it is understood that as gAI evolves, other tools may be used as well.
- AI must not be used to generate content that misleads, including "deepfakes" or other forms of synthetic media designed to appear real.

IV. Compliance

- A. All AI activities must comply with applicable local, national, and international laws and regulations, including but not limited to:
 - Federal Communications Commission (FCC)
 - Corporation for Public Broadcasting (CPB)
 - Public Broadcasting Service (PBS)
 - National Public Radio (NPR)
 - Contractual obligations such as grants, donor interests and production partnerships
- B. Special attention shall be paid to regulations concerning children's programming and accessibility services.

PROCEDURE

- I. AI usage must comply with BTPM's confidentiality practices including the use of proprietary information. At no time shall confidential information be shared within AI applications including, but not limited to:
 - a. Member/donor information
 - b. Employee information
 - c. Financial information

If necessary, such data may be masked or used in aggregate form only.

- II. AI applications shall be used for work-related purposes only when accessed with a BTPM provided email address. All works, including AI-generated content and inventions, shall become the sole property of BTPM. BTPM reserves the right to use all works, names, affiliations,

likenesses, promotional materials, voice works, written works, and any other related content at its sole discretion.

III. AI usage shall ultimately enhance and/or create efficiencies within one's scope of work. BTPM may integrate gAI for various uses including, but not limited to, the list below. All uses must adhere to the guidelines outlined in this policy or other related organization policies.

- Preliminary research
- Brainstorming
- Editing/proofing copy/content/data
- Recording and transcribing meetings
- Collecting and summarizing data from meetings, listening sessions, and feedback
- Voicing training videos
- Cleaning up audio (noise, artifacts, etc.)
- Splitting vocals from music for spot beds
- Documentation for methodologies, workflow processes, and training
- Efficiency tips (how to optimize formulas, debugging, etc.)
- Survey/Focus group development and bias mitigation
- Email templates
- Summarizing audio recordings from focus groups
- Develop/revise content descriptions (videos, thank you gifts, etc.)
- Generating keywords, hashtags, and similar resources
- AI voicing for underwriting and promo spots
- Editing/proofing emails and communications
- Summarizing longer written material
- Document generation
- Image generation

Additional uses of AI must be vetted by the BTPM employee utilizing the application as well as secondary approval by a member of management or designated employee. Employees are encouraged to consult multiple AI systems or applications for the same work in order to reduce AI "hallucinations" and seek the most accurate information as possible.

IV. AI Literacy, Continuous Education and Training

As the world of AI develops, staff are expected to avail themselves to BTPM provided resources, tools and trainings as well as self-paced learning and education to ensure the appropriate usage of AI, specifically for the media industry. Employees are encouraged to learn about ethical challenges, understand potential risks, and mitigate biases inherent in AI tools.

V. Paid Applications

Through the AI Governance Committee, BTPM shall regularly review AI applications authorized for staff use. Any applications paid for, or otherwise authorized by BTPM, are expected to be used by staff for their

intended function(s) using a work-provided email address. Staff are encouraged to experiment with applications/platforms while adhering to this Policy. If paid subscriptions are needed, employees are required to submit a request to their supervisor for a BTM paid subscription. At no time shall an employee be reimbursed for purchases without prior written approval.

VI. Guidelines from Partner Organizations

Employees should familiarize themselves with and adhere to relevant AI guidelines provided by partner organization such as PBS and NPR. Notable guidelines include:

- Never fully create content using AI without significant human oversight.
- Do not use AI to replace human creativity, journalism, or artistic endeavors.
- Always verify the originality and accuracy of AI-generated content, recognizing the potential for plagiarism and misinformation.
- Ensure transparency in content creation by disclosing the involvement of AI where significant.
- Protect intellectual property by avoiding uploading proprietary or sensitive data into AI systems without proper authorization.

Any questions regarding this policy may be directed to the People Operations Department.

Additional Resources:

[PBS Standards – “Applying Standards to Generative AI Tools”](#)

[NPR Ethics Handbook: Generative Artificial Intelligence](#)

[Guiding Principles for AI Usage Rev 3-2025.pdf](#)