



Artificial Intelligence Use Policy

Purpose

The International Union of Painters and Allied Trades (“IUPAT”) considers data and its use to require significant oversight. This policy outlines the guidelines and principles regarding the use of Artificial Intelligence (AI) within IUPAT to ensure ethical, transparent, and fair practices. It also ensures that AI is used in a manner that prevents the inadvertent disclosure or exposure of IUPAT Data and/or Protected Health Information (“PHI”). It aims to protect workers’ rights, maintain job security, and promote the responsible and transparent implementation of AI technologies. This policy applies to all employees, contractors, and third-party vendors who develop, use, or interact with AI systems on behalf of IUPAT. This policy follows the AFL-CIO's guidance on [worker-centered AI](#). The use of AI tools across the IUPAT must be approved by the IUPAT Chief Information Officer (CIO)/AI officer before use.

Scope

This policy applies to all AI tools, systems, and technologies utilized or contemplated for use by IUPAT, including those used for internal operations, communication, membership management, collective bargaining, or any other functions that directly or indirectly impact the data of our members, participants, beneficiaries, and/or employees. This policy covers all AI systems, including, but not limited to:

- Machine Learning (ML) models
- Deep Learning (DL) models
- Natural Language Processing (NLP) systems
- Computer Vision systems
- Robotic Process Automation (RPA) systems utilizing AI
- Generative AI systems
- AI-powered analytics tools

The industry releases new AI tools and technologies daily. Parties covered under this policy must seek guidance and advice from the IUPAT CIO/AI officer in the use of all AI.

Definitions

- **Machine Learning (ML) model:** development and study of statistical algorithms that can learn from data and generalize to unseen data, and thus perform tasks without explicit instructions.
- **Deep Learning (DL) model:** utilizing multilayered neural networks to perform tasks such as classification, regression, and representation learning.
- **Natural Language Processing (NLP) system:** processing of natural language information by a computer.
- **Computer Vision system:** methods for acquiring, processing, analyzing, and understanding digital images, and extraction of high-dimensional data from the real world in order to produce numerical or symbolic information, e.g. in the form of decisions.
- **Robotic Process Automation (RPA) systems utilizing AI:** a form of business process automation that is based on software robots (bots) or AI agents. RPA is based on automated technology that follows a predefined workflow.
- **Generative AI system:** uses generative models to generate text, images, videos, audio, software code, or other forms of data. These models learn the underlying patterns and structures of their training data and use them to generate new data in response to input, which often takes the form of natural-language prompts.
- **Agentic AI:** AI agents (also called compound AI systems or agentic AI) are a class of intelligent agents distinguished by their ability to operate autonomously in complex environments. Agentic AI tools prioritize decision-making over content creation and do not require continuous oversight.

Principles of AI Use

- **Transparency and Accountability:** IUPAT will ensure that any AI system adopted is transparent, with clear documentation of how it operates, the data it uses, and the decisions it makes. IUPAT will be accountable for the deployment and use of AI technologies and will provide members with the necessary information about the purpose, benefits, and risks associated with these systems. All use of AI tools must be approved by the IUPAT CIO/AI officer.
- **Protection of Worker Rights:** AI systems should be used in a manner that does not compromise workers' rights, privacy, or dignity. IUPAT will ensure that AI does not replace human workers in ways that undermine job security, fair wages, or working conditions.
- **Data Privacy and Security:** AI systems must adhere to strict data privacy standards to protect members' personal and employment information. Any data collected or processed by AI must be stored securely, used only for the intended purpose, and comply with relevant laws and regulations. The use of AI tools for recording and processing meetings is forbidden, as referenced in the IUPAT Constitution, Section 218.
- **Protected Health Information (PHI):** AI platforms shall not be used for any PHI unless specifically approved in writing by the AI officer prior to its use.
- **Bias Mitigation:** IUPAT will work to ensure that AI technologies are free from discriminatory biases. AI systems should be regularly audited for fairness, and measures should be taken to eliminate bias based on race, gender, age, disability, or any other characteristic protected by law.

AI Use in Decision-Making

- **Fairness:** AI should not be used to make decisions about hiring, promotions, compensation, or disciplinary actions without human oversight. IUPAT will ensure that AI systems assist, rather than replace, human decision-making processes, maintaining fairness and due process.
- **Dispute Resolution:** If an AI system leads to a dispute or grievance, IUPAT will ensure that the dispute is resolved through transparent, fair, and human-mediated processes. AI should never replace the human element in conflict resolution or undermine workers' ability to voice concerns.

Implementation and Oversight

- **Monitoring:** The IUPAT will regularly monitor AI deployment and use to ensure it aligns with the objectives of protecting workers' rights and welfare.
- **Continuous Review:** As AI technologies evolve, IUPAT will continuously review and update this policy to address new challenges, ensure ongoing fairness, and adapt to changing labor-market conditions.
- **AI Auditing:** Prior to any employee using an AI tool, the CIO/AI officer shall review the platform. This includes any tools currently available to IUPAT employees. Prior to using AI Technology, legal counsel will review the AI tool to ensure that all applicable privacy laws are considered. If an AI tool is being considered for use across the entire IUPAT enterprise, IUPAT will conduct a Privacy Impact Assessment to ensure that, if PHI is included, the AI tool is HIPAA-compliant. Additionally, regular audits will be conducted on any AI tools used by IUPAT. These audits will evaluate the effectiveness, fairness, and potential risks associated with AI systems.
- **Designated AI Officer:** A designated AI Officer will be responsible for overseeing the implementation of this policy, providing guidance and support to employees, and ensuring compliance with relevant laws and regulations. The CIO will also serve as the designated AI Officer.
- **Request to use new tools:** A request to use a new AI tool may be sent to support@iupat.org for review. The CIO/AI officer will convene a team with representatives from each IUPAT affiliate and legal offices to review and approve the tools to ensure the workers' perspectives from each area is considered. All approved tools will be listed on the IUPAT Intranet site.

Enforcement

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract, and may also result in legal consequences.

Conclusion

IUPAT is committed to using AI technologies responsibly, ethically, and transparently. This policy ensures that IUPAT's adoption and implementation of AI aligns with its mission to protect the rights, dignity, and interests of workers while embracing innovation that benefits all members.

This policy is a living document and will be revised as necessary to ensure that IUPAT remains at the forefront of advocating for workers in an AI-driven future.

References

- **AFL-CIO AI Policy:** [Artificial Intelligence: Principles to Protect Workers | AFL-CIO](#)
- **IUPAT Constitution:** [IUPAT Constitution 2025_English](#)