

Policy # **20.40**

Section Title: Board and Corporate Administration

Subject: Artificial Intelligence

Effective Date: May 1, 2026

A. POLICY STATEMENT AND PURPOSE

The Workers Compensation Board of Manitoba (WCB) recognizes that Artificial Intelligence (AI) provides the opportunity to enhance the effectiveness and efficiency of WCB operations and delivery of services to workers and employers.

The WCB also recognizes that AI must be used in a way that protects the privacy and security of information, preserves the integrity of the system and in a manner that manages risks associated with the use of AI.

The WCB is committed to using AI in a way that is transparent, responsible and accountable. The WCB is also committed to using AI to enhance the quality, efficiency, and safety of its services. Any AI use will be focused on augmenting human capabilities, improving operational processes, and supporting our employees in delivering greater value.

The WCB has developed this policy to establish the guiding principles the WCB will use when considering the use of AI tools and the framework for managing risks associated with the use of AI.

B. DEFINITIONS

Artificial Intelligence (AI) means technology that enables systems or machines to perform tasks or produce outputs that normally require human intelligence such as learning, comprehension, problem solving, decision making, research, pattern recognition, or creativity. AI includes, without limitation, generative AI systems, machine learning, natural language processing systems or large language models, whether developed by WCB or provided by a third party.

AI tool means a software application or program that uses AI to perform tasks.

C. PRINCIPLES GUIDING THE USE OF AI

The WCB will evaluate and implement AI tools in a purposeful, transparent, responsible and accountable manner in accordance with the following principles.

1. **Relevancy.** AI tools must be used to address a clearly defined need or problem, ensuring the benefits of the use of AI outweigh the risks.
2. **Reliability.** AI tools must be reliable, meaning they are consistent and predictable, reasonably accurate for their intended purpose, and adaptable.
3. **Transparency.** AI tools must be transparent and explainable, meaning that content generated by AI is understandable and can be confirmed, and the use of AI can be explained to individuals or groups impacted by AI generated content.
4. **Fairness.** AI tools must be used in a way that is compliant with human rights, accessibility, and fairness obligations and consistent with all applicable legislative, regulatory and WCB policy requirements. The WCB will ensure that AI tools are used in a manner that is consistent with the principles of procedural fairness and in accordance with WCB Policy 22.00, *Decision Making*.
5. **Accountability and Human Oversight.** The WCB is accountable for the use of AI and AI generated content. The WCB will review AI generated content to ensure it is accurate, ethical, and legally compliant. The WCB will not rely on AI generated content as the sole basis for any decisions impacting workers, their dependants, or employers.
6. **Data Security and Privacy.** In using AI tools, the WCB will ensure that data security and privacy are maintained in accordance with privacy legislation and WCB policies including WCB Policy 21.50, *Information Protection, Access and Disclosure*. The WCB will only use information or data in AI tools for the purpose for which it was collected and only to the extent necessary to administer *The Workers Compensation Act*.
7. **Alignment with WCB Vision, Mission and Values.** The WCB will ensure that the use of AI is aligned with, and supports, the WCB's vision, mission and values.

D. RISK MANAGEMENT

The WCB recognizes that the use of AI carries potential risks to the rights, safety and security, privacy, autonomy or economic interests of individuals or groups. The WCB commits to assessing and managing potential risks associated with the use of AI tools using the following process.

1. Identify the need or problem that the AI tool is intended to address and determine if AI use is appropriate.
2. Identify any direct or indirect risks associated with the AI tool.
3. Assess the risks, determining whether the risks can be eliminated or reduced to an acceptable level. The WCB recognizes that some risk may be inherent in the use of AI tools; however, the WCB will make reasonable efforts to ensure that implementing an AI tool does not increase the level of risk beyond that already associated with performing the action without the use of AI.
4. Identify and apply proportionate controls to eliminate or reduce risks to an acceptable level.
5. Monitor implemented AI tools to ensure that they remain aligned with the principles set out in this policy.
6. Monitor implemented risk controls to ensure proportional controls remain appropriate, adjust the controls if required or eliminate the use of the AI tool where necessary.

E. STAFF TRAINING AND ACCEPTABLE USE

The WCB will ensure that employees and other authorized users of AI tools receive appropriate training and guidance regarding responsible use of AI.

F. DISCLOSURE OF THE USE OF AI

The WCB will notify users if they are interacting with an AI tool. The WCB will also disclose the use of AI in decision making and explain how it contributed to an outcome whenever that use is material to the decision. In each case, the WCB will provide information about the use of AI in a clear and accessible way.

AI use is considered material when it influences the decision in a way that would likely be different if AI had not been used, or if it had been used differently. AI will not be considered material where its use is limited to:

- Administrative, clerical or formatting support;
- Transcription or summarization that does not alter meaning or is not relied upon;
- General research or drafting assistance that is fully reviewed and independently validated by a human decision maker.

The use of AI or the disclosure of its use in decision making does not create a new ground or avenue for reconsideration or appeal. The existing reconsideration and appeals processes set out in *The Workers Compensation Act* and WCB policies continue to apply.

G. ADMINISTRATION OF THIS POLICY

This policy will be reviewed annually, or more frequently as required to respond to evolving legislative, regulatory and public sector standards relating to AI.

The WCB will revise its framework and this policy as necessary to maintain compliance and alignment with emerging AI requirements.

Related WCB Policies:

21.50, *Information Protection, Access and Disclosure*

22.00, *Decision Making*

History:

1. New policy approved by Board Order 08/26 on April 23, 2026, effective May 1, 2026.