



Wiltshire Treehouse

Artificial Intelligence (AI) Policy

Document Control

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Document Sources (for governance and compliance context):

- Charity Commission for England and Wales – “Charities and Artificial Intelligence” (2 April 2024) – <https://charitycommission.blog.gov.uk/2024/04/02/charities-and-artificial-intelligence/>
- Information Commissioner’s Office (ICO) – “Guidance on AI and data protection” (updated 15 March 2023) – <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/artificial-intelligence/guidance-on-ai-and-data-protection/>
- ICO – “A guide to the data protection principles” (19 May 2023) – <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-protection-principles/a-guide-to-the-data-protection-principles/>
- ICO – “What does the UK GDPR say about automated decision-making and profiling?” – <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/automated-decision-making-and-profiling/what-does-the-uk-gdpr-say-about-automated-decision-making-and-profiling/>
- UK Government – “Data and AI Ethics Framework” (18 December 2025) – <https://www.gov.uk/government/publications/data-ethics-framework/data-and-ai-ethics-framework>

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1. Purpose

Wiltshire Treehouse supports bereaved children and young people. We may use Artificial Intelligence (AI) to improve efficiency and quality in low-risk areas, but we will do so in a way that protects beneficiaries, upholds trust, and meets our legal and governance duties. This policy sets clear boundaries for ethical, safe, and proportionate use of AI.

2. Scope and Audience

This policy applies to all trustees, staff, volunteers, and anyone acting on behalf of Wiltshire Treehouse. It covers any AI-enabled tool used for charity work, including generative AI (text or image creation), AI summarisation, AI search assistants, and AI features embedded in everyday software.

This policy should be used in conjunction with the IT policy.

3. Definitions

- **Artificial Intelligence (AI):** Software that performs tasks associated with human intelligence (e.g., pattern recognition, summarising, generating content).
- **Generative AI:** AI that produces new text, images, audio, or other content in response to prompts (e.g., chatbots and image generators).
- **Third-party AI tool:** Any external service or product feature supplied by a vendor (e.g., ChatGPT, Microsoft Copilot, Google Gemini, Canva AI).
- **Personal data:** Information relating to an identified or identifiable person, including children, families, staff, volunteers, donors, and partners.
- **Special category data:** Sensitive personal data under UK GDPR (e.g., health, mental health, safeguarding information).

4. Governance, Accountability and Trustee Oversight

Trustees have overall responsibility for ensuring that any use of AI supports the charity's purposes, protects beneficiaries, and manages risk appropriately. AI does not make decisions for Wiltshire Treehouse: people do. Human judgement, compassion, and professional oversight remain central to our work.

Governance expectations include:

- Maintaining an agreed, reviewed AI policy and supporting procedures.
- Treating AI use as an operational, reputational, safeguarding, and data protection risk (and recording it in the risk register where appropriate).
- Ensuring staff and volunteers are trained and understand what is and is not permitted.
- Ensuring appropriate procurement, vendor checks, and controls for any third-party AI tool used for charity activity.
- Ensuring incidents are reported and managed in line with data protection and safeguarding reporting requirements.

5. Principles for Using AI at Wiltshire Treehouse

- **Safeguarding first:** AI must never compromise child safety or the charity's safeguarding duties.
- **Human accountability:** A human is always responsible for AI-assisted work and for checking accuracy and appropriateness.
- **Confidentiality and privacy:** Do not place personal or sensitive information into AI tools unless explicitly approved and compliant.
- **Fairness and inclusivity:** We will watch for bias, stereotyping, or exclusion in AI outputs and avoid harm.
- **Transparency:** We will be open internally about AI use and transparent externally where appropriate.
- **Proportionality:** Use AI only where the benefits clearly outweigh risks, especially given our beneficiary group.

6. Acceptable Uses of AI (Permitted)

AI may be used for low-risk, non-sensitive tasks that support the charity's operations, provided outputs are reviewed by a human and no personal or sensitive data is used.

- Drafting or improving general administrative documents (e.g., meeting agendas, internal templates).
- Proofreading and tone-checking non-confidential content.
- Generating ideas for fundraising, campaigns, events, or volunteer engagement (non-personal).
- Summarising publicly available information for research or planning (with source checking).
- Creating generic design concepts or layouts (without using real beneficiary images or personal data).
- Developing draft content for public-facing communications, subject to full human review and fact-checking.

7. Prohibited Uses of AI (Not Permitted)

Because we work with bereaved children and young people, the following uses are prohibited:

- Providing bereavement support, counselling, therapeutic advice, or emotional responses directly to service users.
- Communicating with children, young people, or families using AI-generated messages without explicit approval and human supervision (including chatbots).
- Using AI for safeguarding assessments, triage, decision-making, or responding to disclosures.
- Inputting, uploading, or summarising case notes, session details, disclosures, safeguarding concerns, or any identifiable personal data into AI tools.
- Making decisions about eligibility, access to support, or service prioritisation based solely or primarily on AI.

- Creating or sharing misleading content, deepfakes, impersonations, or anything that could undermine trust or reputation.
- Using unapproved AI tools for charity business, particularly where data terms are unclear or privacy controls are insufficient.

8. Data Protection and Confidentiality Requirements

AI use must comply with UK GDPR and the Data Protection Act 2018, and with Wiltshire Treehouse's Data Protection, Confidentiality, and Safeguarding policies.

Key rules:

- Assume AI tools are not private. Do not enter anything you would not be comfortable appearing in public.
- Do not include personal data, special category data, or safeguarding information in prompts.
- Where AI is used for drafting, use placeholders (e.g., [Child], [Parent/Carer], [Date]) and add specifics manually afterwards.
- Do not upload charity documents containing personal data into AI tools (including 'summarise this document' features).
- If a future use-case requires AI to process any personal data, a Data Protection Impact Assessment (DPIA) and trustee approval are required in advance.

9. Safeguarding

AI must not be used to interpret, respond to, or manage safeguarding concerns. If a safeguarding issue arises, follow Wiltshire Treehouse's safeguarding procedures immediately. AI cannot replace professional judgement, empathy, or the duty to act.

10. Ethical Considerations

Wiltshire Treehouse works in a sensitive space. We therefore apply heightened ethical safeguards to AI use:

- **Respect and dignity:** AI outputs must never trivialise grief, trauma, or lived experience.
- **Non-maleficence (do no harm):** Avoid any AI use that could cause distress, misinformation, or unsafe advice.
- **Bias and fairness:** Check for bias (e.g., assumptions about families, culture, gender, disability, socio-economic status).
- **Authenticity and trust:** Do not present AI-generated content as a personal, human message in sensitive contexts.
- **Consent and expectations:** Beneficiaries should not be surprised by AI involvement in any service-adjacent interaction.

11. Third-Party Tools and Vendor Management

Many AI features are provided by third parties. Before using a new AI tool for charity work, the charity must consider security, privacy, legal terms, and suitability.

Minimum requirements for third-party AI tools:

- A clear understanding of what data is processed, where it is stored, and whether prompts/outputs are retained or used to train models.
- Appropriate account controls (e.g., managed accounts, MFA, role-based access where available).
- Privacy settings configured to the strictest available options.
- Contractual terms reviewed for confidentiality, intellectual property, and data processing (where applicable).
- Approval by a designated senior staff member (and trustee involvement for higher-risk use).

Examples of third-party tools that may be used (subject to this policy): ChatGPT or similar chat tools for drafting non-confidential text; Microsoft Copilot for productivity drafting; Canva AI for generic design concepts. These must never be used with beneficiary data.

12. Quality Control, Human Review and Record Keeping

All AI-assisted work must be quality-checked before use. At minimum:

- Check factual accuracy and add sources where appropriate.
- Check tone, inclusivity, and safeguarding sensitivity.
- Remove any content that could be interpreted as professional therapeutic advice unless written and approved by qualified staff.
- Keep a record of significant AI use in governance or high-profile outputs (e.g., trustee papers, policies, public statements).

13. Incident Management

Any suspected breach of this policy must be reported promptly to management. Examples include accidental entry of personal data into an AI tool, inappropriate AI-generated content being shared, or concerns that AI use has created a safeguarding or reputational risk.

Incidents will be managed in line with existing procedures, including:

- Data protection breach assessment and reporting where required.
- Safeguarding escalation where relevant.
- Internal review of what happened, corrective actions, and training updates.

14. Training and Awareness

Wiltshire Treehouse will provide proportionate guidance to trustees, staff, and volunteers on safe AI use. All users must understand the prohibited areas (beneficiary support, safeguarding, personal data) and the need for human review.

15. Review

This policy will be reviewed at least annually, or sooner where there are significant changes in technology, regulatory guidance, or the charity's risk profile.