



## **Wishing Well Music for Health Artificial Intelligence (AI) Governance & Usage Policy**

### **1. Purpose and Guidelines**

The purpose of this policy is to provide clear guidelines for the use of AI technologies within our organisation. It ensures that our use of AI:

- Aligns with our mission and values of creativity, connection, collaboration, and to place our participant voice at the centre of all of our work.
- Respects the privacy of the Wishing Well community.
- Supports our goal of being an ethical, sustainable, and inclusive organisation.

This policy is for all Wishing Well staff, including freelance contract holders, musicians, and trustees. It sets out how we use AI safely and ethically in our work. It also applies to pilots and supplier-provided AI features embedded in common software.

### **2. Responsibilities and Oversight**

Overall responsibility for the implementation of this policy is delegated by the Board of Trustees to the Chief Executive Officer (CEO). The CEO is responsible for ensuring Wishing Well uses AI safely, ethically, and in line with this policy, approving new tools, and reporting regularly to the Board.

### **3. Definition of Approved Tools (The Gemini Standard)**

Artificial Intelligence (AI) refers to systems that simulate human intelligence to learn and think. Generative AI involves models that can create new text, outlines, or summaries based on prompts.

- **Approved System:** Wishing Well exclusively uses **Google's Gemini generative AI tool under a paid business subscription model**. This specific system is selected because it enforces strict enterprise-grade privacy boundaries: it guarantees that our input data and prompts remain completely confidential within our domain, are never used to train public AI models, and

are never reviewed by external human loops.

- **Strict Restriction on Public Tools:** Wishing Well does not use free or public AI tools (such as ChatGPT Basic or free web versions of Gemini) for any organisational content, internal communications, or charity data, as these public tiers do not offer the same legal data-protection guarantees.
- **Basic Account Exception:** Staff may use a free ChatGPT account only when the “Improve the model for everyone” setting is turned off. It may only be used for low-risk tasks such as brainstorming ideas or summarising public information. No Wishing Well data (internal, confidential, personal, or special category) may ever be entered into free accounts.

#### 4. Permitted Use Cases vs. Prohibited Actions

AI may be used to optimise our internal operations, including but not limited to drafting, reviewing, summarising, planning, and research. However, human review is required at every stage, and outputs must be treated as suggestions, not facts, and must be checked before use.

**Table 1: AI Do's and Don'ts for WWMFH**

| Area     | Do                                           | Don't                                              |
|----------|----------------------------------------------|----------------------------------------------------|
| Data     | Use anonymised info only.                    | Enter personal data into free accounts.            |
| AI Tools | Use approved AI tools.                       | Use public or free AI tools for Wishing Well work. |
| Checking | Check text and always fact-check before use. | Publish or share unchecked text.                   |
| Ethics   | Keep AI human-first.                         | Use AI to replace empathy or connection.           |

#### 5. Data Privacy, Safeguarding, and Transparency

We are committed to the highest standards of data privacy and security.

- **Data Protection:** To ensure the protection of privacy, we will not input

personal or sensitive data into any AI tools. All AI solutions will be evaluated to confirm that they maintain the confidentiality and integrity of the data we handle without involving personal information.

- **Digital Hygiene:** We follow safe AI practices, never pasting in passwords, remaining alert to unsafe links, and double-checking text before sharing.
- **Transparency:** We will be open about when AI supports or produces content that affects the people we support or our staff.
- **Procurement:** Before using any new AI tool, we will complete a Data Protection Impact Assessment, AI Impact Assessment, and security check to make sure it is safe, fair, and compliant.

## 6. Incident Response and Learning Plan

If something goes wrong when using AI, it must be reported immediately.

- **Reportable Incidents:** Examples include leaks of confidential or personal data, harmful or biased outputs, and data exposure or breaches.
- **Near Misses:** Near misses (such as almost entering personal data into an unapproved AI tool) must also be reported.
- **Oversight:** All incidents and near misses will be logged and reviewed by the CEO and shared in Board reports.

## 7. Policy Review

We acknowledge that AI is a rapidly evolving technology and will review this policy regularly. In the first year we will review every quarter and annually thereafter. The Wishing Well CEO will keep up to date with the latest relevant information through appropriate training and peer support to strengthen data governance, transparency, fairness, and to reduce bias.

Policy Adopted: 23rd September 2026

First Review: 23rd January 2027