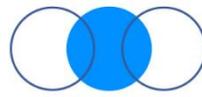


<b>Code</b>	<b>AIP.001</b>
<b>Title</b>	<b>Artificial Intelligence (AI) Use Policy</b>
<b>Status</b>	<b>Active</b>
<b>Prepared by</b>	<b>Dorian Roberto Ramirez Sosa</b>
<b>Approved by</b>	<b>Stuart Hanson</b>
<b>Date Approved</b>	<b>13.03.2026</b>
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<b>Contact Officer</b>	<b>Stuart Hanson</b>
<b>Distribution Status</b>	<b>Controlled</b>



## 1. Policy Overview

This policy outlines the principles, requirements, and guidelines for the ethical, legal, and secure use of Artificial Intelligence (AI) and Machine Learning (ML) technologies within Direct Mediation Services (DMS).

This policy applies to all Artificial Intelligence systems regardless of provider. It includes tools such as ChatGPT, Google Gemini, Microsoft Copilot, Claude, Otter AI, transcription systems, and AI features embedded in other software platforms.

All AI systems used by DMS employees and subcontractors must comply with this policy regardless of vendor, platform, or technology.

## 2. Approved AI Systems and Organisational Accounts

Direct Mediation Services provides access to Google Gemini through organisational accounts linked to official DMS email addresses (e.g. @directmediationservices.co.uk). Gemini is provided under a paid organisational licence and has been configured to comply with the security, data protection, and confidentiality requirements set out in this policy.

Because the platform is centrally managed and configured with appropriate privacy and security settings, staff and subcontractors are encouraged to use Gemini when AI assistance is required for work-related tasks.

The use of Gemini through a DMS email account indicates that the platform has already been reviewed by Direct Mediation Services and that the necessary safeguards are in place, including appropriate data protection controls, security standards, and restrictions on the use of user input for model training where applicable.

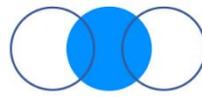
Where these protections cannot be confirmed, the platform must not be used for any work relating to Direct Mediation Services.

Personal or privately registered Artificial Intelligence accounts must not be used to process any information relating to Direct Mediation Services (DMS), its operations, or mediation participants.

This restriction exists because personal AI accounts typically operate under consumer terms of service that do not provide the level of security, data protection assurances, and organisational control required for professional mediation services. In particular, personal accounts may lack contractual safeguards regarding data processing, may permit user input to be used for model training, and do not allow Direct Mediation Services to enforce organisational security controls or audit usage.

Given the highly confidential and sensitive nature of family mediation data, including personal, financial, and safeguarding information, the use of personal AI accounts presents an unacceptable risk to client confidentiality and data protection compliance.

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For this reason, only AI systems that are accessed through approved organisational accounts and paid or enterprise-level licences may be used for work related to Direct Mediation Services.

Staff and subcontractors may use other Artificial Intelligence platforms where necessary. However, before doing so they must ensure that the platform used provides equivalent protections to those required by this policy. This includes ensuring that the system:

- compliance with appropriate security and encryption standards
- adherence to vendor data protection and privacy policies consistent with UK GDPR and the Data Protection Act 2018
- confirmation that user inputs are not used to train AI models
- availability of contractual safeguards or enterprise terms, where applicable
- full compliance with the requirements set out in this AI Use Policy

Staff and contractors must not introduce client data, case information, or internal organisational information into any AI system that has not been approved under these standards.

### 3. Human Oversight

AI tools must never be used to make automated decisions affecting mediation participants.

All outputs generated by AI must be reviewed and approved by a qualified mediator or authorised member of staff before being relied upon or shared.

### 4. Confidentiality and Client Data

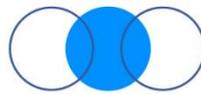
Protecting mediation confidentiality is a fundamental principle of Direct Mediation Services.

Where AI tools are used, staff must ensure that information entered into any AI system is anonymised wherever possible.

The following information must not be entered into **external** AI tools, unless they have undergone appropriate due diligence:

- full names of mediation participants
- addresses
- dates of birth
- financial details

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- safeguarding information
- medical information
- records relating to domestic abuse

Highly sensitive information must never be processed through external AI systems.

## 5. Data Protection Compliance

This policy operates in accordance with:

- UK GDPR
- Data Protection Act 2018
- ICO Guidance on Artificial Intelligence and Data Protection
- Family Mediation Council Code of Practice

## 6. Prohibited Uses of AI

Artificial Intelligence must not be used to:

- determine mediation outcomes
- provide legal advice to mediation participants
- assess credibility of participants
- predict case outcome
- replace mediator judgement
- conduct live mediation sessions without mediator supervision

## 7. Training and Compliance

All staff using AI must receive appropriate information on:

- this policy
- anonymisation of case data when using external AI tools

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