



Artificial Intelligence

Acceptable Use Policy

This policy applies to all AEM Living employees, contractors, agency workers, and volunteers. It sets out the rules for using Artificial Intelligence tools in connection with your work.

VERSION 4.0 | JULY 2026

Classification: Internal — All Staff

Owner: Technology & Systems Team & People and Culture

Review Date: April 2027

Commented [C1]: VERSION NUMBER: The cover page says v1.0 but the filename references v2. Please align these before final adoption.

1. Introduction

AEM Living is committed to using technology in ways that improve how we work, support our owners, and help our teams deliver exceptional service. Artificial Intelligence (AI) tools offer real opportunities to do all of these things — but they also carry risks if used without care.

This policy sets out what AI tools you are permitted to use, how you must use them, and what you must never do. It applies to everyone who works for or with AEM Living, regardless of your role, location, or whether you work in a village, a care setting, or a central office.

Not following this policy is a serious matter. Misuse of AI tools can put owners at risk, breach data protection law, and result in disciplinary action up to and including dismissal.

We want to encourage thoughtful and confident use of these tools — this policy is here to help you use them well, not to create barriers.

Commented [C2]: TONE CHANGE: Sentence added to balance the compliance-heavy opening with a positive statement encouraging thoughtful use of AI tools.

Why does this matter?

AI tools can process large amounts of information very quickly — but they do not always get things right, and they can cause serious harm if misused. In a care and retirement setting, an error caused by AI could affect an owner's health, safety, or dignity. This policy exists to make sure we use AI tools responsibly and in a way that protects everyone.

2. Who This Policy Applies To

This policy applies to:

- All permanent and fixed-term employees of AEM Living
- Agency and temporary workers
- Contractors and consultants working on AEM Living systems or data
- Volunteers with access to AEM Living systems

It applies whenever you are using AI tools in connection with your work at AEM Living — whether you are on-site, working from home, or using a personal device to carry out work tasks.

3. What Is an AI Tool?

An AI tool is any software, application, or online service that uses Artificial Intelligence to generate, summarise, translate, transcribe, or analyse content. This includes:

- AI writing assistants — tools that draft emails, letters, reports, or other documents
- AI chatbots — conversational tools you can ask questions or give instructions to
- AI meeting tools — tools that transcribe or summarise meetings and calls
- AI image generators — tools that create or edit images from a text description
- AI data tools — tools that analyse spreadsheets, documents, or data and produce summaries or insights

- AI browser extensions — add-ons that offer AI features within your web browser

If you are unsure whether a tool counts as an AI tool for the purposes of this policy, ask IT before using it.

4. Approved AI Tools

You may only use AI tools that have been approved by the Technology & Systems Team. Using any other AI tool for work purposes is a breach of this policy.

Tool	What It Is For	Who Can Use It
Microsoft 365 Copilot	Drafting emails, summarising documents, Teams meeting notes, PowerPoint and Excel assistance	All staff with an M365 licence — access granted by IT
Microsoft Teams Premium	Transcription and summary of Teams meetings	All staff using Teams — must notify all participants before recording
Claude for Enterprise	Complex document drafting, policy review, detailed analysis tasks	Authorised staff only — access granted by IT on request
Microsoft Copilot in Power BI	Analysing and summarising business data and reports	Authorised managers and analysts — access granted by IT

This list will be updated as new tools are approved. The current approved list is always available on the IT pages of the intranet. Do not assume a tool is approved just because a colleague is using it — check with IT if you are unsure.

4a. Requesting Access to Approved AI Tools

Some approved AI tools are available to all staff with the relevant licence, while others require a specific access request. To request access to a restricted approved tool, contact the IT helpdesk at support@zenzero.co.uk with the following information:

- Your full name, job title, and department or village
- The name of the tool you are requesting access to
- A brief description of the work purpose for which you require the tool

The Technology & Systems Team will assess requests and respond within five working days. Access may be granted, declined, or granted subject to conditions. Requests may be declined where the proposed use is outside the scope of this policy or where a more suitable approved tool is already available.

Commented [C3]: NEW SECTION ADDED: '4a. Requesting Access to Approved AI Tools' inserted here to provide a clear process for staff to request access, which was absent from the original policy.

4b. Amendment and Revocation of Access

Access to any approved AI tool may be amended, restricted, or revoked at any time by the Technology & Systems Team, without prior notice, where required for security, compliance, or operational reasons. Group policy takes precedence over any previously granted individual access.

Staff will be notified of changes where practicable, but continued access cannot be assumed. AEM Living also reserves the right to update the list of approved and prohibited tools at any time in response to changes in technology, regulation, or risk. It is each user's responsibility to check the current approved list on the intranet before use.

Commented [C4]: NEW SECTION ADDED: '4b. Amendment and Revocation of Access' inserted here to make explicit that access can be amended or revoked at any time subject to group policy.

5. Prohibited AI Tools

Important — Please Read Carefully

The tools listed below must never be used for any AEM Living work purpose. This includes using them on a personal device or personal account during your working day for work-related tasks.

The examples below are illustrative, not exhaustive. Any AI tool not on the approved list is prohibited — these are listed to highlight the most commonly encountered unapproved tools. The following tools are prohibited for any use involving AEM Living data, owner information, staff information, or any work-related content:

Commented [C5]: CLARIFICATION ADDED: A sentence has been added to make clear the prohibited tools list is illustrative, not exhaustive.

- ChatGPT (free or Plus version) — chatgpt.com
- Google Gemini (free version) — gemini.google.com
- Microsoft Copilot (free, non-M365 version) — copilot.microsoft.com when not signed in with your AEM Living account
- Any AI browser extension not approved by IT
- Any AI image generation tool not approved by IT (including DALL-E via ChatGPT, Midjourney, Adobe Firefly free tier)
- Any other AI chatbot, writing assistant, or summarisation tool not on the approved list

These tools are prohibited because they do not provide the data protection guarantees required by law. When you enter information into these tools, that information may be used to train AI models and cannot be retrieved or deleted. This is a serious breach of UK GDPR and AEM Living's data protection obligations.

6. What You May and Must Not Do

The table below sets out the key rules for using approved AI tools. These rules apply regardless of which approved tool you are using.

✓ You MAY	✗ You must NOT
Use approved AI tools to help draft routine emails, letters, and internal documents	Enter owner names, care details, health information, or personal data into any AI tool
Use AI to summarise long documents or meeting notes to save time	Enter staff personal information (salaries, performance details, HR matters) into any AI tool
Use AI to help structure your thinking or brainstorm ideas	Enter financial data, commercially sensitive figures, or contract details into any AI tool
Always read and check AI-generated content before sending or using it	Use a prohibited tool (such as free ChatGPT) for any work task
Use AI tools only through your AEM Living account and approved access	Present AI-generated content as your own expert opinion in a care, clinical, or regulated context
Tell meeting participants before using AI transcription tools	Use AI to make or automate decisions about an owner's care without human review and sign-off
Report any concerns about AI outputs or potential data incidents to IT immediately	Use AI to generate images of real people, owners, or staff
Use AI tools to help translate content into other languages (always have a fluent speaker verify the result)	Share your AEM Living AI tool access or login with anyone else

A tip on prompting safely: Where possible, anonymise or generalise information before entering it into an AI tool. For example, instead of "Draft a letter to [Owner Name] about their care plan," use "Draft a letter to a resident explaining a change to their care routine." This protects individuals while still allowing you to benefit from AI assistance.

Commented [C6]: NEW GUIDANCE ADDED: A safe prompting tip has been added beneath the May/Must Not table to help staff use AI tools productively while protecting individuals.

7. Owner and Care Data — Special Rules

AEM Living works with some of the most sensitive personal data that exists — the health, care, and personal circumstances of our owners. This data deserves the highest level of protection, and AI tools require extra care in this context.

Absolute Rule

No owner personal data — including names, room numbers, health conditions, medication details, care plans, or any information that could identify an owner — may be entered into any AI tool without explicit prior written confirmation from the Technology & Systems Team that this is permitted for that specific system and purpose.

Commented [C7]: WORDING CLARIFIED: The 'Absolute Rule' has been reworded to remove the internal contradiction between 'approved or otherwise' and the exception clause that followed. The new wording is clearer and more actionable.

In addition to the absolute rule above:

- AI must never make or recommend a care decision without a qualified member of staff reviewing and approving that decision
- AI-generated entries must never be placed directly into a care record without staff review and sign-off
- If you use AI to help draft a communication to an owner or their family, you must read it carefully and take personal responsibility for its accuracy and tone before sending
- If you are ever unsure whether using AI in a care context is appropriate, do not use it — speak to your manager or contact IT

8. Data Protection and Privacy

Using AI tools is subject to the same data protection rules as any other use of technology at AEM Living. The key principles to remember are:

- Only enter the minimum information needed — do not paste whole documents or files into AI tools if only a small portion is relevant
- If a task requires personal data to be processed by AI, speak to IT first to confirm whether this is permitted and which tool should be used
- AI outputs may contain errors, invented facts, or information that looks correct but is not — always verify before acting on AI-generated information
- AI tool usage is monitored and logged by IT. This is to protect AEM Living and its owners, not to track individual productivity
- Any suspected data breach involving an AI tool — for example, if you realise you have entered owner data into a prohibited tool — must be reported to IT and the Data Protection Officer within one hour of becoming aware

AEM Living's full Data Protection Policy and Privacy Notice remain in force alongside this policy. AI use does not create any exception to those obligations.

9. Meetings and AI Transcription

Microsoft Teams Premium includes AI transcription and meeting summary features. These are approved for use, subject to the following rules:

- You must tell all participants at the start of a meeting if you intend to use AI transcription — this is a legal requirement, not optional
- Meeting transcripts and summaries must be treated as confidential internal documents and stored appropriately
- Transcripts must not be shared outside AEM Living without authorisation
- AI meeting summaries may contain errors — always review the summary before circulating it as a record of the meeting
- Transcription must not be used in one-to-one HR meetings, disciplinary or grievance hearings, or any meeting where a participant has asked for it not to be used

10. Intellectual Property and Accuracy

AI tools generate content by drawing on vast amounts of publicly available text. This creates two important issues you need to be aware of:

10.1 Accuracy

AI tools can produce content that sounds authoritative but is factually wrong. This is sometimes called a hallucination. You must never rely on AI-generated facts, figures, statistics, legal guidance, or clinical information without independently verifying them from a reliable source. If in doubt, leave it out.

10.2 Intellectual Property

AI-generated content may inadvertently reproduce copyrighted material. Do not publish, print, or distribute AI-generated content externally (including on social media, in marketing materials, or in owner communications) without a human review to check accuracy, tone, and appropriateness. All AI-generated content used externally must be reviewed and approved by your manager before use.

11. Reporting Concerns and Incidents

If any of the following happen, you must report it promptly:

- You accidentally enter owner, staff, or other personal data into a prohibited AI tool
- You believe an AI tool has produced content that could cause harm or embarrassment to AEM Living, an owner, or a colleague
- You become aware of a colleague using a prohibited AI tool for work purposes
- You receive an unexpected or inappropriate response from an approved AI tool
- You suspect your AI tool access has been accessed by someone else

How to Report

Contact the IT helpdesk immediately: support@zenzero.co.uk or call the IT helpdesk number on the intranet. For suspected personal data breaches, also notify the Data Protection Officer. Do not wait - the sooner an incident is reported, the sooner it can be contained.

12. Consequences of Misuse

Breaching this policy is a serious matter. Depending on the nature and severity of the breach, the following may apply:

- Informal guidance and retraining for minor or first-time inadvertent breaches
- Formal disciplinary action under AEM Living's Disciplinary Policy for deliberate or repeated breaches
- Dismissal for gross misconduct where a breach causes or risks serious harm — for example, entering owner care data into an unauthorised AI system

- Referral to the Information Commissioner's Office (ICO) or other regulators where a breach constitutes a reportable data incident
- Personal civil or criminal liability in serious cases

AEM Living takes data protection and the safety of owners very seriously. This policy is not designed to discourage you from using helpful technology — it is designed to make sure that when we do, we do so safely and responsibly.

12a. Regulated and External Reporting

AI tools must not be used to draft or prepare content for submission to regulators or external bodies — including the Care Quality Commission (CQC), local authorities, or commissioners — without manager approval and a thorough human review of all content before submission.

All externally submitted content remains the professional responsibility of the named author or the relevant AEM Living team. AI assistance does not reduce that responsibility. Any factual errors, regulatory inaccuracies, or omissions in submitted content are the responsibility of the staff member who reviewed and submitted it.

Commented [C8]: NEW SECTION ADDED: '12a. Regulated and External Reporting' inserted to address a gap — the policy did not previously cover use of AI when preparing content for regulators (e.g. CQC) or external bodies.

13. AI in Marketing

This section provides additional guidance for members of the Marketing team and anyone who creates or publishes content on behalf of AEM Living. It supplements the rules in sections 5, 6, and 10 and should be read alongside them.

AI-generated imagery and design templates are increasingly common across the industry. Without careful review, their use risks making AEM Living appear unprofessional and inconsistent with our brand. AI tools are also known to introduce errors into visual content - including adding or altering people in photographs, changing faces, replacing objects, or incorrectly naming villages and locations. Content published without thorough checks can damage the integrity of what we share publicly.

✓ You MAY use AI for	✗ You must NOT use AI to
<ul style="list-style-type: none"> • Draft text for social media posts • To inspire content and creative ideas • To add approved virtual furniture to property images (using approved tools only) 	<ul style="list-style-type: none"> • Create or design posters or banners - use the approved Canva process for internal and external posters, and Web2Print for signage and other approved collateral (including Cubigo) • Edit photos, add or alter people in photographs, or generate images using AI tools • Upload any customer, owner, or team personal information into any AI tool • Upload financial or commercially sensitive data • Copy and paste AI-generated content directly into a customer-facing document or post without thorough

✓ You MAY use AI for	✗ You must NOT use AI to
	review and editing <ul style="list-style-type: none"> • Present AI-generated content as your own expert opinion in a care, clinical, or regulated context • Share your AI tool login with anyone else

Photo editing requests: if you need a photograph edited, please submit a request to **Marketing Requests**. The team have access to tried and tested AI prompts and more premium tools, and will ensure that any output meets brand standards before use.

14. Support

If you have questions about this policy or would like guidance on using an approved tool effectively and safely, contact the IT helpdesk. We are here to help you get the most out of these tools in the right way.

Commented [C9]: DUPLICATE REMOVED: This paragraph is an exact duplicate of the one above. Recommend deleting.

15. Policy Information

Policy Title	Artificial Intelligence Acceptable Use Policy
Version	4.0
Date Issued	July 2026
Next Review Date	July 2027
Policy Owner	Technology & Systems Team & People and Culture
Approved By	AI Steering Group
Applies To	All AEM Living staff, contractors, agency workers, and volunteers
Related Policies	Data Protection Policy IT Acceptable Use Policy Disciplinary Policy Confidentiality Policy

Staff Acknowledgement

Please complete and return this page

Once you have read this policy, please complete the section below and return it to your manager or People and Culture.

I confirm that:

- I have read and understood the AEM Living AI Acceptable Use Policy
- I understand which AI tools I am permitted to use and how I must use them
- I understand that entering owner, staff, or other personal data into a prohibited AI tool is a serious breach of this policy
- I understand that breaching this policy may result in disciplinary action, up to and including dismissal
- I will report any concerns, incidents, or suspected breaches to IT immediately

Full Name	
Job Title	
Department / Village	
Date	
Signature	

Please return the completed acknowledgement to your manager or People and Culture.

Where staff are unable to return a physical acknowledgement, a confirmation sent from your AEM Living email address to People and Culture is also acceptable as an alternative.

Commented [C10]: DIGITAL ACKNOWLEDGEMENT:
Sentence added to offer a digital alternative to the paper sign-off, reducing administrative friction.