



Artificial Intelligence (AI) Use Policy

Version 2 | June 2026 | Review date: June 2027

Approved by: Jackie Lindeck and Rachael Aylmer, Company Directors

Scope and status of this policy

This policy applies to all staff, associates, contractors, trainees, and volunteers working on behalf of PartnershipProjects UK Ltd ("PP").

It covers all services delivered by PP, including therapeutic services to families, training delivered to professionals, and organisational consultancy.

This policy is incorporated into all associate contracts and must be followed alongside PP's Data Protection Policy.

1. Purpose

Artificial intelligence tools are increasingly present in professional and therapeutic settings. This policy sets out how PP permits, limits, and governs the use of AI tools by everyone working on its behalf.

Our aim is to enable practitioners to benefit from appropriate AI tools where they support safe, high-quality practice while ensuring that the use of AI never compromises client confidentiality, data protection, professional judgement, or the therapeutic relationship.

2. What we mean by AI

For the purposes of this policy, Artificial Intelligence (AI) refers to any software or system that generates outputs such as text, summaries, transcriptions, insights, or recommendations based on data inputs. This includes:

- Large language models (e.g. ChatGPT, Claude, Gemini)
- Transcription and summarization tools (e.g. Otter.ai, Fireflies)
- Purpose-built clinical note-generation tools (e.g. Yung Sidekick, Mentalyc)
- Built-in AI features within platforms such as Zoom AI Companion or Google Gemini
- Any other tool that processes spoken or written session content automatically

3. Principles

Principle	What this means in practice
Confidentiality	Client data must be protected at all times. AI tools must not expose personal or therapeutic information to third parties or use it to train models.
Human oversight	AI never replaces professional judgement. All AI outputs must be reviewed by a qualified practitioner before use. Clinical decisions remain the practitioner's responsibility.

Principle	What this means in practice
Transparency	Clients are never misled about the use of AI. Where AI is used in connection with a session, explicit informed consent is obtained first.
Data minimisation	Only the minimum necessary data is processed. AI-generated outputs are not retained beyond their immediate purpose.
Safeguarding first	The use of AI must never compromise the safety, wellbeing, or dignity of clients, particularly children and vulnerable adults.
Approval required	No AI tool may be introduced or used in the delivery of PP's services without prior approval from the Data Protection Officer.

4. Permitted uses of AI

The following uses of AI are permitted without specific case-by-case approval, subject to the general principles above:

General administrative and creative tasks

- AI tools may be used for drafting non-personalised materials such as training resources, marketing copy, policy documents, and internal communications.
- AI tools may be used to support formatting, summarising non-identifiable feedback, or general professional development.
- No personal or client-identifiable information may be included in any prompt or input to a general-purpose AI tool.

The following use is permitted subject to the specific conditions in Section 5:

AI-assisted clinical note generation

- An approved AI note-generation tool may be used to assist practitioners in drafting clinical session notes, provided all conditions in Section 5 of this policy are met.
- The use of an approved tool with proper consent is the only circumstance in which client session content may be processed by AI.

5. AI-assisted note generation conditions and process

Where a practitioner wishes to use an AI tool to assist with drafting clinical notes, all of the following conditions must be met without exception:

1. **Use only an approved tool.** The tool must appear on PP's approved list (maintained by the Data Protection Officer). Approved tools are purpose-built for clinical or therapeutic use, are GDPR-compliant, confirm deletion of session recordings after processing, and do not use client data to train AI models. No unapproved tool may be used.
2. **Obtain separate, explicit consent.** Before using an AI tool in connection with any session, written consent must be obtained from the parent or carer separately from general therapy consent. This consent must cover: the name of the tool; what it does; where the data is processed; that the recording is deleted once notes are generated; and that consent can be withdrawn without affecting therapy.
3. **Review all AI output critically.** The AI-generated draft is a starting point only. The practitioner must write their clinical notes using their own professional judgement. Notes must reflect therapeutic assessment, not simply summarise conversation content.

4. **Delete the AI output promptly.** The AI-generated recording or transcript must be deleted within 24 hours of completing the written notes. It must not be stored, shared, or retained for any other purpose.
5. **Store notes in the agreed location.** The practitioner's written clinical notes are the clinical record. They must be stored in the practitioner's designated PP Google Drive folder, in accordance with PP's Data Retention Policy.
6. **Do not use AI note tools for certain cases without specific approval.** Seek guidance from the DPO or Clinical Lead before using AI note tools in cases involving: Child Protection or Child in Need proceedings; trauma-focused therapeutic approaches; or any case where the therapeutic implications of recording are a clinical concern.

Remember

The client's written consent not the practitioner's preference determines whether AI tools can be used. A client who declines must receive the same standard of therapeutic care.

6. Prohibited uses of AI

Never permitted

- Using AI to provide therapy, counselling, clinical advice, or psychological assessment
- Using AI to make or inform decisions about safeguarding, risk, eligibility, or suitability
- Inputting any identifiable client information into a general-purpose AI tool (e.g. ChatGPT, Claude, Gemini)
- Using AI to replace professional judgement or the therapeutic relationship
- Using Zoom's built-in AI Companion or any equivalent built-in video platform AI feature during therapy sessions
- Using any AI note-generation tool without the client's separate, explicit written consent
- Using any AI tool that has not been approved by the Data Protection Officer
- Retaining AI-generated transcripts or recordings beyond the 24-hour deletion window
- Sharing AI-generated outputs with any third party
- Using AI features within Google Workspace (including Gemini) in connection with any client-related content

7. Built-in AI features in video platforms

Several video conferencing platforms, including Zoom, include built-in AI features that can record, transcribe, and summarise sessions automatically. These are not approved for use during therapy sessions.

Zoom AI Companion

Zoom's AI Companion is not permitted for use during therapy sessions delivered on behalf of PP, because:

- Session content is processed on US-based servers, creating data transfer risks under UK GDPR
- Zoom does not automatically delete session content after generating a summary
- The standard notification that 'AI is active' does not constitute informed consent for health data
- The feature is not designed for clinical use and has not been assessed against the required standards for special category data

Action required

If you have been using Zoom AI Companion during therapy sessions, please switch it off immediately and contact the Data Protection Officer. Do not delete any existing outputs before speaking to the DPO.

Other platform AI features

The same caution applies to equivalent built-in AI features in any other video or communications platform. If unsure whether a feature processes session content via AI, contact the DPO before continuing to use it.

8. Special category and children's data

All therapeutic session content constitutes special category personal data under UK GDPR. Where sessions involve children, enhanced safeguarding obligations also apply. No AI tool will be used to process data relating to children or families unless explicitly approved, risk-assessed, and confirmed compliant with both UK GDPR and safeguarding obligations.

9. Responsibilities

All practitioners and associates

- Use AI tools only in line with this policy
- Use only approved tools; do not introduce new tools without DPO approval
- Never input identifiable or sensitive client information into general-purpose AI tools
- Obtain separate written consent before using any AI tool in connection with a session
- Delete AI-generated outputs within 24 hours of completing clinical notes
- Report any suspected breach or inappropriate AI use immediately to the DPO

The Data Protection Officer

- Maintain and publish the list of approved AI tools
- Review new tools against GDPR and clinical standards before approving
- Conduct a DPIA before any new tool is approved
- Oversee compliance with this policy and follow up on any reported concerns
- Review this policy annually

10. Data Protection Impact Assessments

Before any new AI tool is approved, the DPO will conduct a DPIA considering: the nature of the data; where and how it is stored and transferred; whether the tool retains or uses client data for any secondary purpose; risks to data subjects; and compatibility with UK GDPR.

11. Reporting concerns and breaches

Report to: Gabrielle Stirling | gabrielle@partnershipprojectsuk.com | +44 (0) 330 808 0644

Do not attempt to investigate independently. Do not delete relevant data before speaking to the DPO. Misuse of AI tools will be treated as a data protection incident and may result in disciplinary action.

12. Review and updates

This policy will be reviewed annually, or sooner where new AI tools are proposed, legislation changes, an incident occurs, or significant AI developments affect the risk landscape. Practitioners and associates will be notified of material changes.

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DPO	Gabrielle Stirling — gabrielle@partnershipprojectsuk.com
Related documents	Data Protection Policy (V3.2) Recording Consent Form Associate Contract

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PartnershipProjectsUK.com | info@partnershipprojectsuk.com



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