



AI POLICY

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1. Purpose

Small Steps uses artificial intelligence (AI) to support daily work, improve efficiency and assist staff with drafting documents, planning, research and preparing meeting notes. This policy establishes clear expectations for using AI ethically, responsibly and securely while protecting the privacy, dignity and rights of children, families and employees.

The policy aims to prevent inaccurate information, discrimination, misuse and unauthorised disclosure of confidential information. AI-assisted work must receive appropriate human review, and staff remain accountable for the decisions they make and the information they share.

2. Scope

This policy applies to all employees, interns, contractors and other authorised users who use AI for Small Steps work. It covers AI writing assistants, chatbots, image generators, translation tools, meeting transcribers and AI features within company software.

3. Ethical and responsible use

Staff must use AI in ways that reflect Small Steps' commitment to safeguarding, inclusion, fairness and professional integrity.

AI must not be used to:

- Create misleading information, fabricated records or false evidence.
- Impersonate another person or produce deceptive images, audio or video.
- Generate discriminatory, offensive or harmful content.
- Manipulate children, families or employees.
- Bypass company approvals, professional responsibilities or safeguarding procedures.

Staff must consider whether an AI output could cause harm, misrepresent a person or unfairly influence a decision before using it.

4. Approved tools and accounts

Only tools approved by management may be used for company work. Staff must obtain approval before introducing a new tool, enabling an AI feature or connecting an AI service to company accounts.

Approval should consider the tool's purpose, security, privacy settings, access permissions, data retention and whether company information may be used to train AI models.

Operations Department will maintain an approved AI tools register, including meeting transcribers. Staff must use company-approved accounts and must not share passwords or grant unnecessary access to company files.

5. Confidentiality and Data Protection

Staff must not enter identifiable child, parent or employee information into public or unapproved AI tools. This includes clinical records, assessments, safeguarding concerns, photographs, recordings, payroll information and confidential business documents.

Where AI use involving personal information is proposed, the Data Protection Officer must review the purpose and safeguards before use. Approval of a tool does not automatically authorise every type of information to be entered into it.

Staff must:

- Use anonymised information wherever possible.
- Provide only the minimum information needed for the task.
- Check attachments and prompts for identifying details.
- Store outputs in approved company systems.
- Follow company access, retention and deletion procedures.

Removing a name alone may not anonymise information if the person can still be identified from other details.

6. Accuracy and Human Oversight

AI outputs may contain errors, invented references or inappropriate recommendations. Staff must check the accuracy, relevance and tone of AI-assisted work before using or sharing it.

Facts, calculations, references and instructions must be verified against reliable sources or company records. Staff must not approve content solely because it sounds professional or appears convincing.

The employee using AI remains responsible for the final work. Required managerial or clinical approvals must still be obtained.

7. Clinical Safeguarding And Employment Decisions

AI must not independently make diagnoses, select treatment plans, assess safeguarding concerns or make decisions about recruitment, performance, promotion or disciplinary action.

Any permitted clinical assistance must remain within the practitioner's professional scope and receive review by an appropriately qualified clinical lead. AI must not create clinical observations or session records for events that did not occur.

Staff must follow established safeguarding reporting procedures promptly. Using AI must never delay reporting a concern or seeking appropriate assistance.

8. Fairness Transparency and Ownership

Staff must review outputs for bias relating to culture, nationality, language, gender, disability, age or other personal characteristics. Content should be respectful, accessible and suitable for the intended audience.

AI assistance must be disclosed where it materially influences an assessment, recommendation or decision, or where company procedures require it.

Staff must respect copyright and ownership rights. They must not assume AI-generated content is original or suitable for publication without review, and must obtain permission before using another person's image, voice or work.

9. AI - Meeting Transcribers

Small Steps may use approved AI meeting transcribers to prepare transcripts, summaries and action points.

The meeting organiser must inform participants beforehand, explain what will be captured and how it will be used, and obtain their agreement before recording or transcription starts. Participants joining late must also be informed. If anyone objects, the organiser must stop transcription and use written minutes.

The following controls apply:

- Transcription must be limited to the agreed meeting and purpose.
- Sensitive clinical, safeguarding, disciplinary or employee discussions require specific management and Data Protection Officer approval before transcription.
- Automatic joining of meetings must be disabled unless specifically approved.
- Transcripts and recordings must be accessible only to authorised staff.
- External sharing requires approval and a check for confidential information.
- Recordings and transcripts must follow the company's approved retention and deletion schedule.

The meeting organiser must check names, statements, decisions and action points before sharing the summary or adopting it as an official record. AI-generated minutes must not be treated as an accurate record without review.

10. Staff Training and Reporting Concerns

Staff must receive guidance on approved tools, confidentiality, bias, accuracy checks and meeting transcription before using AI for company work. Managers must provide support where employees are unsure whether a proposed use is appropriate.

Any accidental disclosure, unauthorised recording, harmful output or suspected misuse must be reported promptly to HR, the Head of Operations or the Data Protection Officer. Staff must stop the affected activity and follow instructions to contain the issue while preserving relevant evidence.

11. Accountability and Review

Managers are responsible for overseeing AI use within their teams. Employees must follow this policy and cooperate with any review of suspected misuse.

Breaches may be addressed through the company's disciplinary procedures, taking account of the circumstances and seriousness of the incident.

Operations team will review this policy annually, or sooner when new AI tools, significant risks or changes in company practices require an update.

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