

AI Use Policy: CPDassist & CPD Portfolio Tools

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Applies to	All individual users, corporate clients, NHS Trusts, and partner organisations

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Artificial intelligence is no longer a future concept in professional practice, it is present, applied, and growing across every regulated sector. NHS Trusts now deploy AI for clinical documentation, ambient scribing, and medical note-taking. Solicitors use AI to draft legal submissions. Engineers use AI to produce technical reports. The question is no longer whether AI belongs in professional life, it is how we use it responsibly, ethically, and in a way that supports rather than undermines professional standards.

CPDme is committed to leading that conversation in the Continuing Professional Development (CPD) space. We serve professionals across more than 120 governing bodies, from nurses and operating department practitioners to social workers, pharmacists, and accountants. Our responsibility is to provide tools that help professionals develop, reflect, and evidence their learning safely and with integrity.

CPDassist, our AI-powered reflection support tool, has been designed with those principles at its core. It is a writing support tool, nothing more. It does not record learning for you. It does not fabricate experience. It helps you say more clearly what you already know and have lived.

This policy document has been prepared to give individual professionals, corporate clients, NHS Trusts, and partner organisations full transparency about how CPDassist works, the ethical framework underpinning it, our data protection commitments, and the professional obligations that remain with every user.

We welcome scrutiny. If your organisation has questions not answered here, we invite you to contact us directly.



Andrew Ormerod
CEO & Co-Founder, CPDme



This policy applies to:

- All registered users of the CPDme platform (dashboard.cpdcloud.co.uk) and mobile application
- Corporate subscribers using CPDteams, CPDresilience, or CPDtrack
- NHS Trusts, health boards, and integrated care systems operating CPDme as a staff development tool
- Educational institutions, universities, and training providers using CPDme for student portfolio management
- Any organisation that has integrated CPDme as part of its staff CPD or revalidation compliance framework
- Third-party administrators, HR managers, and line managers accessing CPDme on behalf of staff

This policy should be read alongside CPDme's Privacy Policy, Terms of Service, and Data Processing Agreement (available on request for corporate clients).

CPDassist is an AI-powered writing support feature embedded within the CPDme platform. It uses large language model (LLM) technology to assist users in:

- Structuring and drafting CPD diary entries and reflections
- Improving the clarity, grammar, and professional tone of written entries
- Prompting reflective thinking by suggesting relevant frameworks (such as Gibbs, Kolb, or What/So What/Now What)
- Identifying learning themes and linking entries to scope of practice or learning needs
- Helping users articulate outcomes and improvements to their practice

CPDassist does not:

- Create learning activities or experiences on the user's behalf
- Access or share information with other users or external organisations
- Make regulatory or clinical decisions
- Submit entries to professional bodies without explicit user action
- Store prompts or outputs in any form that is visible to CPDme staff without consent

Key Principle

CPDassist is a writing support tool, not a thought replacement. Every entry must reflect the user's genuine learning, genuine experience, and genuine reflection. AI shapes the words. You provide the substance.

We believe professionals and their organisations deserve to understand exactly how AI features function within our platform. The following provides a plain-language explanation.

4.1 The Technology

CPDassist is powered by a large language model (LLM), a form of generative AI trained on large volumes of text. When a user activates CPDassist, the content of their current entry is sent to the model along with contextual instructions. The model returns suggestions for improvement, extended reflection, or structural guidance.

4.2 What Data is Processed

When CPDassist is active, the text content of the individual diary entry or reflection being worked on is processed. This processing is governed by our Data Processing Agreement and is compliant with UK GDPR and the Data (Use and Access) Act 2025. No special category personal data (as defined under UK GDPR Article 9) relating to patients, service users, or third parties should be included in CPD entries.

4.3 Human in the Loop

All AI suggestions are presented to the user for review before any content is saved. The user retains full editorial control at all times. No AI-generated text is automatically saved to the portfolio without explicit user acceptance. This is what regulators and ethicists refer to as maintaining a 'human in the loop' the AI provides, but the professional decides.



CPDme recognises that not every professional, employer, or regulatory body may be comfortable with AI assistance in CPD recording and we fully respect that position. CPDassist has therefore been designed as an optional, toggleable feature.

CPDassist ENABLED	CPDassist DISABLED
AI suggestions available on demand	No AI processing of entry content
Reflection prompts and structure guidance active	Full manual entry experience retained
User remains in full control of all content	No data transmitted to LLM services
All entries still belong to the user	All platform features remain available

How to toggle CPDassist:

- Individual users: Toggle via Settings in the CPDme dashboard or mobile app
- Corporate administrators: Enable or disable CPDassist across teams via the CPDteams management dashboard
- NHS Trusts and large organisations: CPDassist can be disabled at the organisational level as part of onboarding configuration, please speak with your account manager

Organisational Note

- If your organisation's policy, professional body guidance, or clinical governance framework requires AI tools to be disabled, CPDme will accommodate this without any reduction in core platform functionality.
- Contact your account manager or our team at team@cpdme.com to configure this for your deployment.

6.1 Permitted Use

CPDassist may be used to:

- Draft, structure, or improve the written quality of reflective CPD entries
- Expand on the professional's own described learning experience
- Suggest reflective frameworks and prompt deeper analysis of practice
- Improve grammar, vocabulary, and professional tone
- Identify potential links between entries and professional competency frameworks
- Summarise or consolidate notes made by the professional during or after an activity

6.2 Prohibited Use

CPDassist must not be used to:

- Generate CPD entries that describe activities, training, or experiences the user has not undertaken
- Fabricate, invent, or exaggerate learning outcomes, clinical events, or competency evidence
- Produce CPD evidence for a professional other than the account holder
- Include identifiable patient, service user, or third-party information in any AI-processed entry
- Circumvent revalidation, audit, or assessment requirements of any professional body
- Create fraudulent evidence for registration renewal, disciplinary proceedings, or legal purposes

Important

- Misuse of CPDassist to produce false or misleading CPD evidence may constitute professional misconduct under the standards of the relevant regulatory body (e.g. HCPC, NMC, GMC, SWE, GPhC, CORU) and may result in account suspension and/or referral.
- CPDme reserves the right to suspend access where misuse is identified or reported.

The use of AI writing support does not transfer ownership, responsibility, or accountability for CPD records. These remain entirely with the individual professional.

7.1 The Professional Remains Responsible

Every CPD entry saved to a CPDme portfolio, regardless of whether AI assistance was used, is the professional's own record. By saving an entry, the professional confirms that:

- The activity, learning, or experience described is genuine and has taken place
- The reflection is an honest representation of their thinking, development, and practice
- The entry has been reviewed, edited, and approved by them personally before saving
- They are satisfied the entry accurately represents their professional development

7.2 AI as a Tool, Not an Author

CPDassist is a writing tool in the same category as spell-checkers, grammar assistants (such as Grammarly), and dictation software, all of which are widely used in professional practice without question. The AI does not author CPD entries. It assists professionals in expressing their own knowledge, experience, and reflection more clearly. In this respect, using CPDassist is equivalent to asking a colleague to proofread a reflection, or using a template to structure an entry, the substance comes from the professional.

7.3 Disclosure

Where an employer, professional body, regulator, auditor, or assessor requests disclosure of AI use in CPD recording, users should confirm that AI was used as a writing support tool. The recommended disclosure statement is:

Suggested Disclosure Statement:

"AI writing assistance (CPDassist, provided by CPDme) was used to support the drafting and structuring of reflective entries within this portfolio. All activities, learning, and reflections described are genuine and represent my own professional development. I have reviewed, edited, and approved all entries personally."

CPDme serves professionals regulated by over 120 professional bodies. While no UK regulator currently prohibits the use of AI writing assistance in CPD portfolio management, users should be aware of the relevant standards applicable to their profession.

Regulator	CPD Standard	AI Use Compatibility
HCPC	Outcome-based, 2-year cycle; portfolio audit by random sample. Must demonstrate impact on practice.	Compatible, AI may assist structuring reflections. Content must be genuine.
NMC	35 hours CPD per 3-year revalidation; 5 reflective accounts required. Must discuss with confirmer.	Compatible, AI may support written reflection. Professional accountable for accuracy.
GMC	50 hours/year plus 5-year revalidation cycle. Reflective practice and appraisal required.	Compatible, AI as a writing tool only. Reflective discussion with appraiser remains essential.
GPhC	Outcomes-focused CPD records; must show continued competence.	Compatible, subject to GPhC guidance updates. Content must be authentic.
SWE	CPD linked to Professional Capabilities Framework. Records must evidence ongoing development.	Compatible, authenticity and professional ownership essential.
CORU (Ireland)	CPD requirements vary by registration board; portfolio and reflection required.	Compatible, users should check individual board guidance.
IOSH	CPD Log required; structured reflection on outcomes encouraged.	Compatible, AI may assist structured reflection entries.

CPDme monitors regulatory guidance updates across all bodies and will update this policy accordingly. Users are responsible for checking their own regulatory body's current stance on AI use.

The integrity of a CPD portfolio is fundamental to public protection. Regulators require CPD records to be genuine, accurate, and reflective of real professional development, because the ultimate purpose of CPD is to ensure that professionals are safe, competent, and up to date. Any misuse of AI that results in false CPD records is not merely a breach of platform terms, it is a potential regulatory, professional, and legal matter.

CPDme is explicit:

CPDassist must never be used to:

- Generate descriptions of training, events, supervision, or clinical activity that did not occur
- Fabricate evidence of competencies, qualifications, or knowledge not genuinely held
- Misrepresent the depth or breadth of reflective learning
- Impersonate another professional or record CPD for another person's portfolio

We regard these prohibitions not as restrictions, but as a natural extension of the professional values our users already hold. The standards expected of professionals by their regulators, honesty, integrity, and accountability, apply fully in the digital CPD environment.

For professionals subject to CPD audit, whether by their regulatory body, their employer, an NHS Trust, or a commissioning body, the use of AI assistance in CPD recording does not diminish the auditability or defensibility of entries, provided they are used correctly.

10.1 What Auditors Assess

Regulators such as the HCPC assess CPD on the basis of:

- Whether activities are relevant to the professional's scope of practice
- Whether reflections demonstrate genuine learning and application
- Whether the portfolio shows impact on the service user or patient
- Whether supporting evidence is retained and available

AI assistance does not affect any of these criteria, provided the underlying activity and reflection are genuine.

10.2 Audit Best Practice for AI-Assisted Entries

- Retain supporting evidence for all CPD activities (certificates, attendance records, supervision notes)
- Ensure reflections are specific to your own experience, not generic AI-generated text
- Review all AI-assisted entries carefully before saving, edit to personalise and ensure accuracy
- Be prepared to discuss any entry verbally with an assessor, confirmer, or auditor
- Note in your portfolio summary that AI writing support was used, as good practice

Good Practice Recommendation

- It is considered good practice to note within your portfolio summary that AI writing assistance was used to support the articulation of your CPD. This demonstrates transparency, reflects professional maturity, and mirrors approaches increasingly adopted across other documentation contexts, including clinical notes, legal submissions, and academic research.
- Transparency about AI use is a strength, not a weakness.

11.1 Legal Framework

CPDme operates under the following legislative and regulatory framework:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025 (in force from 19 June 2025)
- Information Commissioner's Office (ICO) Guidance on AI and Data Protection
- ICO AI and Data Protection Risk Toolkit

11.2 Our Commitments

- CPD entry content processed by CPDassist is used solely for the purpose of generating writing support suggestions for that entry
- No CPD entry content is used to train AI models
- No special category personal data (race, health, religion, etc.) should be included in CPD entries; if included inadvertently, it is not stored or used for AI training
- Data is processed under the lawful basis of contract performance and, where applicable, legitimate interests
- A Data Processing Agreement is available for corporate clients and NHS Trusts on request
- CPDme has completed an AI-specific Data Protection Impact Assessment (DPIA) in accordance with ICO guidance

11.3 Patient & Service User Data

Professionals should never include identifiable information about patients, service users, clients, or colleagues in CPD entries. This applies regardless of whether CPDassist is in use. Where clinical examples are used to support reflection, they must be anonymised in accordance with your professional body's guidance and your organisation's information governance policies.

11.4 Your Rights

All users retain full data subject rights under UK GDPR, including the right to access, rectify, erase, and port their personal data. For full details, please refer to the CPDme Privacy Policy at www.cpdme.com/privacy

The use of AI in professional documentation is not new, nor is it unique to CPDme. It reflects a widespread, accelerating adoption of AI across every sector in which our users work.

12.1 AI in the NHS

NHS England has published extensive guidance on AI across health and care, including a framework for safe implementation in the London health and care system (2025). Ambient AI scribing, where AI converts clinical conversations into structured medical notes and letters, is now being actively implemented across NHS Trusts. NHS Digital has published specific guidance for technology leaders on implementing ambient scribing products, which combine generative AI with speech recognition to produce clinical documentation directly.

Recent research involving 63 healthcare professionals across a tertiary trauma unit in the UK found that while only 52% had used AI for clinical or administrative work, 70% indicated they would do so if officially approved, with the primary barriers being data security concerns, clinical inaccuracy risks, and a lack of institutional policy. This underlines exactly why clear, transparent policies like this one are essential.

12.2 AI in Clinical Documentation

NHS Trusts including Rotherham Doncaster and South Humber NHS Foundation Trust have published formal AI policies (2026) governing the use of tools such as Microsoft 365 Copilot for drafting documents, summarising information, and supporting administrative tasks. AI is formally approved for non-clinical documentation tasks, precisely the category in which CPD recording falls.

12.3 The Parallel with Medical Notes

AI ambient scribes are now assisting clinicians in writing medical notes, letters, and discharge summaries in real time. The clinician reviews, edits, and approves the AI-generated draft, exactly as CPDassist operates. If AI-assisted clinical documentation is considered acceptable, transparent, and professionally defensible in NHS clinical practice, the same logic applies equally to CPD reflection writing.

12.4 AI Across Other Professions

Legal professionals use AI to draft submissions, correspondence, and contracts. Accountants use AI for report writing and analysis. Engineers use AI for technical documentation. Social workers increasingly use AI to support recording. In every case, the professional retains responsibility for accuracy, authenticity, and professional judgement, and CPD recording is no different.

CPDme does not dismiss the genuine ethical debate around AI in professional documentation. We believe professionals deserve a transparent, balanced account of the arguments, so they can form their own informed view.

13.1 The Case for AI Assistance in CPD

- Many professionals, particularly those with dyslexia, second-language English, or limited time, find that the written demands of reflective CPD create a barrier that has nothing to do with their actual professional competence. AI removes a linguistic and structural barrier, not a substantive one.
- Reflective writing is a skill, and like all skills it benefits from scaffolding and feedback. AI can provide that structure without diminishing the authenticity of the reflection.
- Recent academic literature (Cheng et al., 2025) supports the use of AI in professional writing provided authenticity, transparency, and human oversight are maintained, the exact principles CPDassist is designed around.
- The international trend is clearly towards AI-assisted professional documentation. Engaging with it transparently and ethically positions professionals ahead of the curve rather than behind it.

13.2 The Concerns, Acknowledged Honestly

- There is legitimate concern that AI could enable professionals to generate plausible-sounding reflections that do not represent genuine learning. CPDme acknowledges this risk and addresses it through strict acceptable use standards, transparency requirements, and our commitment to user accountability.
- There are concerns around AI hallucination, the tendency of AI systems to generate confident but inaccurate content. For this reason, CPDassist is designed to support and extend the user's own written input, not to generate content from scratch without user-provided substance.
- Equity concerns are also noted: professionals with strong AI literacy may benefit more from CPDassist than those less familiar with it. CPDme offers user guidance and support to ensure all users can access the feature effectively and safely.
- Some professional bodies and employers may have specific objections. CPDme's opt-out functionality directly addresses this, no organisation is required to use CPDassist.

13.3 Our Position

CPDme's position is that AI assistance in CPD recording is ethically defensible, professionally appropriate, and practically beneficial, when it is transparent, optional, user-controlled, and grounded in genuine professional experience. We do not position AI as a replacement for professional reflection. We position it as a tool that helps professionals do what they already do, better.

The ethical standard we apply is simple: if you would be comfortable discussing every entry in your portfolio with your regulator, your manager, or a colleague, the entry meets the standard. CPDassist should only ever be used in a way that supports that conversation, never in a way that makes it impossible.



For organisations deploying CPDme as a staff CPD platform, the following responsibilities apply in relation to the use of CPDassist.

14.1 Organisational Configuration

- Organisations may request that CPDassist be disabled at the organisational level during onboarding or at any subsequent point
- Corporate administrators have dashboard-level control over CPDassist availability for their staff
- All configuration changes should be discussed with your CPDme account manager

14.2 Policy Alignment

- Organisations should ensure their own AI, information governance, and data protection policies are aligned with the use of CPDassist, or that CPDassist is disabled if alignment cannot be achieved
- NHS Trusts operating under the NHS Digital AI governance framework should assess CPDassist under their local Digital Technology Assessment Criteria (DTAC) process where applicable
- CPDme can provide technical documentation, DPIA summaries, and Data Processing Agreements to support this assessment on request

14.3 Staff Communication

- Organisations deploying CPDme are encouraged to communicate this AI Use Policy to all staff users
- This document may be distributed, adapted, and included in staff information packs, with CPDme branding retained
- CPDme can provide a branded, organisation-specific version of this policy on request

14.4 Information Governance

- Remind staff not to include patient, service user, or client identifiable information in CPD entries
 - Ensure line managers and CPD leads are aware of the AI support features and can answer staff questions
 - Log CPDme as a third-party data processor in your organisation's data processing register
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NHS Trust Note

- CPDme is not classified as a clinical system or medical device and does not fall within the scope of DCB0129/DCB0160 clinical risk management standards. It is an administrative and professional development tool.
 - However, CPDme is committed to supporting NHS Trusts in meeting their information governance obligations and welcomes direct engagement with IG leads, Caldicott Guardians, and DPOs.
 - Contact: andrew.ormerod@cpdme.com | 01254 943159
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Q: Does using CPDassist mean my portfolio is not my own work?

No. CPDassist is a writing support tool. The experiences, learning, and reflections in your portfolio are yours. CPDassist helps you express them more clearly, in the same way a spell-checker or grammar tool does. You review and approve every word before saving.

Q: Will my regulatory body accept AI-assisted CPD entries?

No UK regulator currently prohibits the use of AI writing support in CPD recording. What regulators assess is whether your CPD is genuine, relevant, and evidenced, not whether it was drafted with or without writing assistance. However, always check your regulator's latest guidance and be transparent about AI use if asked.

Q: Can my employer see whether I have used CPDassist?

CPDme does not flag individual entries as AI-assisted within the platform. However, your employer may have a separate policy requiring disclosure of AI tool use in professional documentation. Check with your employer or HR team if unsure.

Q: Is CPDassist available in the mobile app?

Yes. CPDassist is available across both the web dashboard (dashboard.cpdcloud.co.uk) and the CPDme iOS and Android mobile applications.

Q: What if my organisation does not permit AI tools?

CPDassist can be fully disabled, either by the individual user in settings, or at the organisational level by your CPDme administrator. Disabling CPDassist has no effect on any other platform features.

Q: Will CPDassist ever submit entries to my regulator?

No. CPDme does not submit anything to any professional body on your behalf. All submission and sharing of CPD records is initiated by the user, under the user's full control.

Q: Does CPDassist use my entries to train AI models?

No. CPD entry content processed by CPDassist is not used for AI model training. Please refer to Section 11 and our full Privacy Policy for details.

Q: What if I have concerns about AI ethics in CPD?

We welcome that conversation. You can disable CPDassist at any time and continue using the full CPDme platform. If you wish to raise a concern or discuss AI ethics with our team, please contact team@cpdme.com.

Policy Owner	Andrew Ormerod, CEO & Co-Founder, CPDme
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This policy will be updated in response to:

- Changes to UK data protection legislation, including the Data (Use and Access) Act 2025
- New or updated guidance from the ICO on AI and data protection
- Changes to regulatory body CPD standards from HCPC, NMC, GMC, GPhC, SWE, CORU, IOSH, ICAEW, and others
- Material changes to the CPDassist feature or the underlying AI technology
- Emerging case law or enforcement actions relevant to AI in professional practice

For questions, concerns, or organisational enquiries about this policy or CPDassist:

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