Use of Artificial Intelligence Privacy Notice

Introduction

At Abbey Medical Centre, we have a legal duty to explain how we use any personal information we collect about you. This AI Privacy Notice supplements the Practice Privacy Notice that can be viewed on the practice's website and applies to approved uses of AI. If you have any questions, please contact our Data Protection Officer Primarycareig@innovatehs.co.uk

The main things the law states we must tell you about what we do with your personal data include:

- Why we collect personal and healthcare information about you
- How we process any personal and/or healthcare information we hold about you
- Who we share it with or pass it on to and why
- How long we can keep it for
- Where information is processed outside the UK and the safeguards used
- What rights you have and how to raise a concern

When the Data (Use and Access) Act 2025 (DUAA) permits a research, archiving or statistical processing activity to rely on publicly available privacy information because individual provision would be impossible or disproportionate, this organisation will ensure the applicable safeguards are met.

Lawful basis

The lawful basis for processing does not change simply because AI is used. For AI systems used to support the provision of individual healthcare, the organisation will normally consider Article 6(1)(e) of the UK GDPR (public task) and Article 9(2)(h) (health or social care) when the relevant statutory requirements and safeguards are met.

For other purposes, including administration, audit, screening, research and service improvement, the organisation will identify and document the appropriate Article 6 lawful basis and, when special category personal data is processed, the applicable Article 9 condition. Consent will not be used as the default lawful basis simply because AI is involved. When consent is relied upon for a particular purpose, the organisation will ensure that it is valid and appropriate for that processing.

The NHS duty of confidentiality also applies. The organisation will consider separately whether the use or disclosure of confidential patient information is permitted under the common-law duty of confidentiality and any applicable NHS information governance requirements.
The DUAA amended, rather than replaced, the UK GDPR and Data Protection Act 2018. The organisation will apply relevant DUAA provisions only when their statutory conditions and safeguards are met.

Which AI tools will we use?

This organisation uses AI tools to give us the ability to create human-like text and context and answer questions in a conversational manner. These AI tools are used to simplify processes to improve the efficiency, quality and speed of our business procedures so that valuable clinical staff time can be better used to deliver patient care.

At Abbey Medical Centre, the following approved AI tools are used:

- Heidi - an AI-powered ambient medical scribe and clinical assistant designed to reduce administrative workloads for healthcare providers - https://www.heidihealth.com/en-gb
- BetterLetter - an AI-powered clinical correspondence and automated coding platform - https://www.betterletter.ai/
- Teams & CoPilot – An online meeting platform which listens to live meeting transcripts to generate instant summaries, capture action items, assign tasks and create dynamic documents - https://www.microsoft.com/en-gb/microsoft-teams/group-chat-software

Only approved tools may be used for this organisation's business or patient information. New uses or significant changes to an approved product will be subject to appropriate review.

How do we use AI?

AI may be used for approved administrative, documentation, clinical-support, audit or research purposes.

Examples include:

- Internal business meeting notes and any action points
- Approved summaries of meetings when our service users and patient cases are discussed

- To support both the compiling and documenting of clinical records
- AI enabled ambient scribing or transcription, when specifically approved
- Approved data analysis for research

If an AI-enabled recording or ambient scribing system is used during a consultation, patients will be informed before recording starts and given an opportunity to raise concerns or decline its use. When a patient dissents from the use of an ambient scribe for individual care, the tool will not be used for that consultation.
The clinician remains responsible for checking and approving any AI-generated clinical documentation. Patients may also raise objections to other AI processing, which will be handled in accordance with the applicable legal requirements.

Governance of AI

We are aware of the risks when using AI. It is totally dependent upon development and training so we must be mindful of some key risks when it can:

- Get things wrong and present incorrect statements as facts (a flaw known as ‘AI hallucination’)
- Be biased and often gullible when responding to leading questions
- Be coaxed into creating toxic content as it is prone to ‘prompt injection attacks’
- Be corrupted by manipulating the data used to train the model (a technique known as ‘data poisoning’)

Before their use is approved, AI tools are subject to enhanced Data Protection Impact Assessments for the specific use case requested. These are considered by the Information Governance Lead and the Data Protection Officer who will decide if they are fit for use.

When applicable, this organisation will consider DCB0160, supplier DCB0129 evidence, Data Technology Assessment Criteria, the Data Security and Protection Toolkit, MHRA medical-device requirements and NHS England guidance. Errors, incidents, data breaches and significant changes in system functionality must be reported and reviewed. At this organisation, we see AI as a tool to support our work, although we understand that ownership and accountability will always remain with our staff members who use and double check the product generated by AI.

We are required by law to provide you with the following information about how we handle your information:

Data Controller	Angie Newton, Business Manager, Abbey Medical Centre
Data Protection Officer	Innovate Health Services - Primarycareig@innovatehs.co.uk
Purpose of the processing	To support approved direct care, administration, audit, screening and, when separately authorised, research. The specific purpose for each AI tool is described in this notice and the Privacy Notice – Practice that is available on the practice website.
Lawful basis for processing	For AI systems used to support the provision of individual healthcare, the organisation will normally consider Article 6(1)(e) of the UK GDPR (public task) and Article 9(2)(h) (health or social care), when the relevant statutory requirements and safeguards are met. For other purposes, the organisation will document the appropriate Article 6 lawful basis and, when special category personal data is processed, the applicable Article 9 condition. Consent will not be used as the default lawful basis simply because AI is involved. When consent is relied upon for a particular purpose, the organisation will ensure that it is valid and appropriate. The NHS duty of confidentiality also applies, and the organisation will consider separately whether the use or disclosure of confidential patient information is permitted.
Recipient or categories of recipients of the processed data	Approved AI suppliers and relevant processors/sub-processors, these being healthcare professionals and staff, and, when applicable, approved research or NHS organisations. Sharing will be limited to what is necessary and authorised.
International transfers	When information is processed outside the UK, this organisation will identify the country and ensure that the transfer complies with current UK data-protection law and an applicable adequacy decision or other lawful safeguard.

Rights	Depending on the circumstances, patients may have rights including access, rectification, restriction and objection, subject to legal exemptions. The DUAA has amended some data-subject rights, and this organisation will apply the law in force at the time of the request. Any patient has the right to access their medical record and have any errors or mistakes corrected and the organisation will consider requests in accordance with the law and the organisation's Access to Medical Records and Online Services Policy.
Retention period	Records will be kept in line with the law and national guidance. Information on how long records are kept can be found in the Records Management Code of Practice. AI recordings, transcripts and drafts will not be retained longer than necessary for the approved purpose.
Automated decision-making	This organisation will comply with the UK GDPR as amended by the DUAA when using automated decision-making. Solely automated decisions producing legal or similarly significant effects will only be used when a lawful basis and the required safeguards apply. Special category information, including health information, has additional restrictions. When AI supports a clinical decision, an appropriately qualified healthcare professional remains responsible for the decision
Right to complain	If you are unhappy with how your information is processed, please contact the Practice Manager or Data Protection Officer in the first instance. The practice operates a data-protection complaints process in accordance with the DUAA 2025, including acknowledging complaints within 30 days and responding without undue delay. Should you be discontent with the response about a data complaint, then you may also escalate the complaint to the Information Commissioner's Office (ICO). For further details, visit https://ico.org.uk/for-the-public/

Reviewed and updated: October 2026