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Data Protection Impact Assessment (DPIA) Template:

Accurx Ambient Scribe

Introduction

This template closely follows the ICO's example of how you can record your DPIA process and outcomes. It follows the process set out in the ICO's DPIA guidance, and should be read alongside that guidance and the criteria for an acceptable DPIA set out in European guidelines on DPIAs.

For product use: Please note that when using Accurx, it is up to the Controller to complete a DPIA. Accurx as a Processor cannot complete it for you. However, to help you complete the assessment, we have filled in the key parts of this DPIA template.

Submitting Controller Details	
Name of Controller	
Subject/ title of DPO	
Name of controller contact/ DPO (delete as appropriate)	

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DPIA Screening checklist

1. Does the proposal/ project involve processing personal data? ('Personal data' is defined as any information related to an identifiable living person which can identify that individual, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person).

    ☑ ~~Yes~~   ☐ No

Please note: if the answer to this question is no, then no further questions need to be answered and the assessment is complete. If the answer is yes, please continue.

2. Does the processing for this project include the evaluation or scoring of any of the following?
    - Profiling and predicting (especially from "aspects concerning the data subject's performance at work);
    - Economic situation;
    - Health;
    - Personal preferences or interests;
    - Reliability or behaviour;
    - Location or movements.

    ☐ Yes   ☑ ~~No~~

3. Automated decision-making with legal or similar significant effect: Processing that aims at taking decisions on data subjects producing "legal effects concerning the natural person" or which "similarly significantly affects the natural person".

    ☐ Yes   ☑ ~~No~~

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4. Systematic monitoring:

   Processing used to observe, monitor or control data subject, including data collected through networks or a "systematic monitoring or publicly accessible area" i.e. CCTV.

   ☐ Yes   ☑ ~~No~~

5. Mostly sensitive data or data of a highly personal nature:

   This includes special categories of data as well as personal data relating to criminal convictions or offences.

   Special Categories of Personal Data means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

   ☑ ~~Yes~~   ☐ No

6. Will this processing combine, compare or match data from multiple sources?

   ☑ ~~Yes~~   ☐ No

7. Data processed on a large scale:

   ☑ ~~Yes~~   ☐ No

8. The innovative use or applying new technological or organisational solutions:

   ☑ ~~Yes~~   ☐ No

9. Mostly data concerning vulnerable data subjects including children (this only applies where the entirety of the data being processed relates to this category).

   ☐ Yes   ☑ ~~No~~

10. Does the processing in itself prevent the data subjects from exercising a right (under UK Data Protection Legislation) or using a service or contract:

☐ Yes   ☑ ~~No~~

Please note: if you have answered 'Yes' to more than one statement above, then a DPIA must be carried by completing the upcoming sections.

Step 1: Identify the need for a DPIA

1.1 Explain broadly the purpose of the product and the type of processing it involves.

Explanatory note: provide just a short description of the purpose of the processing or product, as this will be expanded more on at 'Step 2: Describe the processing'.
You can refer to and/ link other documents, such as project proposals and demos.

The overall aim of the Accurx platform is to improve communications between healthcare staff and patients to improve outcomes and productivity. The Ambient Scribe feature specifically allows healthcare professionals to focus on listening to their patients during consultations, rather than typing or drafting documents. By reducing administrative tasks, it helps them dedicate more time to patient care and improving the overall quality of consultations.

Therefore, the Accurx Scribe feature aims to transform and enhance the quality of clinical consultations and improve care outcomes for patients. The feature enables real-time transcription of consultations, allowing clinicians to focus fully on their patients rather than dividing their attention between conversation and typing up notes. This creates a more engaged and person-centred consultation experience, which supports improved communication and better patient satisfaction.

In short, the Accurx Scribe feature does the following after it is manually started by the user:
- **Listens** to the conversation a clinician has with their patient during the consultation. The audio stream is processed in real-time during conversations and <u>automatically deleted</u> as soon as the audio is transcribed by Accurx Scribe.
- **Transcribes** the conversation
- **Summarises** the transcription of the conversation
- **Generates content** based on the transcription such as clinical notes, referral and/or patient letters
- **Saves consultation notes and coding** back to the patient record

1.2 Summarise why you identified the need for a DPIA

Explanatory note: Provide the reasons on why a DPIA is required. Some examples might

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include:
- the product processes sensitive and/ or special category data;
- the product processes data on a large scale;
- the processing will prevent data subjects from exercising a right.

The need for a DPIA was identified due to the processing on a large scale of health data relating to patients, which is sensitive and confidential in nature, using new innovative technological solutions. Additionally, the transcribed consultations will also be matched with data from multiple sources, such as Personal Demographics Service (PDS), and/ or the Electronic Medical Record (as applicable). This is not available if using Accurx Scribe on the Mobile App.

Therefore, the DPIA is necessary to evaluate the risks to patients and their privacy associated with this type of processing and the mitigations in place to mitigate these risks, ensuring compliance with the data protection legislation.

Step 2: Describe the processing

Nature of processing

2.1 What is the source of the data?
The sources of the data are: • The patients and the healthcare professionals themselves whose consultation is being listened to, transcribed and, afterwards, used by the healthcare professionals to generate content as they see fit • The Personal Demographic Service (PDS) and/or the electronic medical systems used for fetching patient demographic information required to ensure that clinical notes are saved to the correct patient's record. If using Accurx Scribe on the Mobile App, users cannot save a consultation to a patient's record from the app.
2.2 How will the data be collected?
The data sourced directly from patients and healthcare professionals during their consultation will be collected where the Accurx Scribe feature is turned on. The demographic data obtained from the PDS and/or the electronic medical systems will be obtained as part of the secure integrations that Accurx has with these systems.

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2.3 How will the data be used?

The data will be surfaced to healthcare professionals in the product to help them make decisions about what next action is required in a patient's care based on the transcription and content generated at the end of the consultation.

Healthcare professionals can generate the following content based on the transcription of the consultation, such as clinical documents, referral letters and patient letters. These documents are generated based on templates already defined within the product.

The product also allows healthcare professionals to save any content generated back to the patient's record.

2.4 How will the data be deleted?

The audio stream is processed in real-time during conversations and automatically deleted as soon as the audio is transcribed by Accurx Scribe. This ensures that the audio, which is highly sensitive, is not retained any longer than necessary to fulfil their purpose.

All other outputs generated by Accurx Scribe, such as transcriptions, clinical notes, and summaries, are retained as personal data for a period of 30 days. After the 30-day retention period has passed, the vast majority of these outputs are permanently and securely deleted. A very small fraction, specifically those that have been substantially edited by the healthcare professional, are effectively anonymised (therefore no longer considered personal data) and used exclusively for clinical safety purposes — never for AI model training or any commercial use. Please see here for more information about how these outputs are processed for clinical safety purposes.

Within the retention period, there are two different ways through which Accurx can support the Data Controllers with deletion requests involving transcriptions, clinical notes or other documents generated as part of its Scribe service:

- Throughout the duration of the service contract, Accurx, as a Data Processor, will comply with any data deletion instructions reasonably given by the Data Controllers. In line with the NHS Information Governance Standards, Accurx would require a signed confirmation from the Data Controller's Caldicott Guardian/DPO, co-signed by a senior clinical representative.

- In the event of termination of the service contract, Accurx will delete or return all the existing data within 90 days of the contract end, in accordance with our Data Processing Agreement (DPA).

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2.5 Will the data be shared with anyone?

At the healthcare professional's decision, data will be shared with either other healthcare professionals, or the patient themselves as part of providing care.

To the extent required for the provision of the service, Accurx will only share data with the sub-processors (such as cloud service providers) which are involved in the delivery for the Accurx software platform. All of Accurx's sub-processors operate based on Article 28 UK GDPR-compliant agreements.

2.6 How will the data flow?

This data flow map illustrates how data flows throughout the Accurx system. The section highlighted with a red border shows how the data flows for the Accurx Scribe feature.
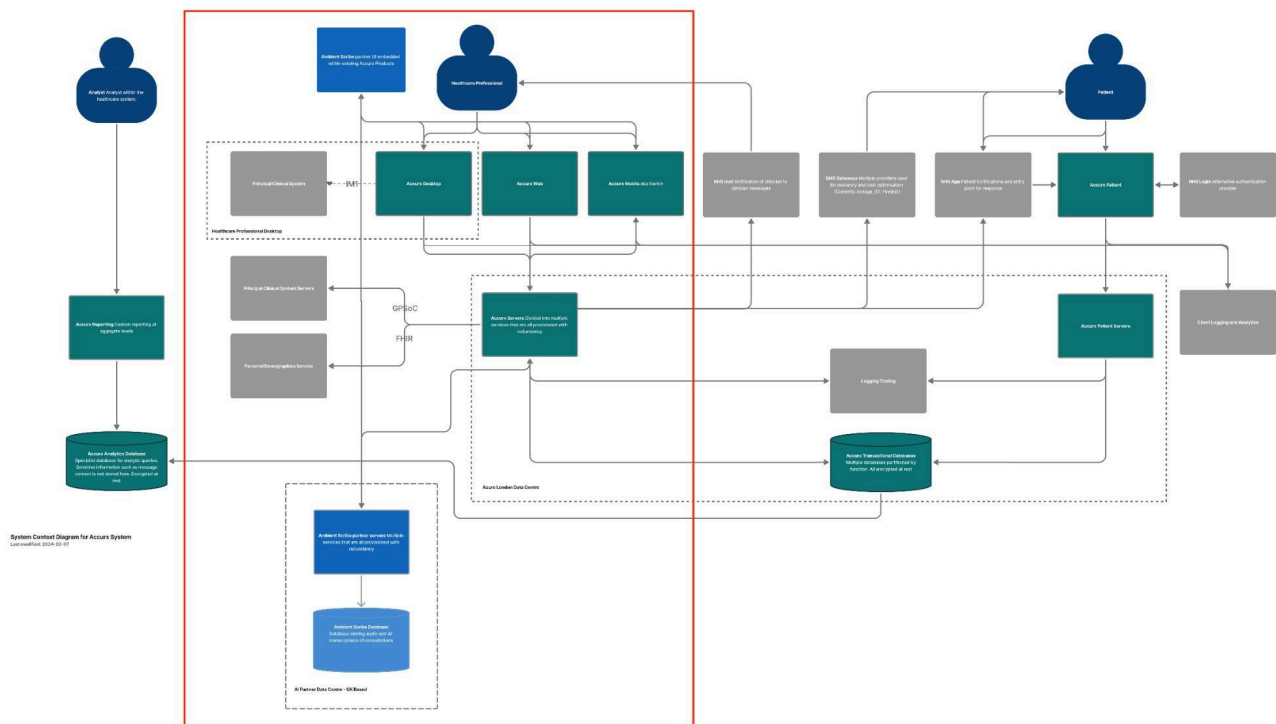
2.7 What types of processing have been identified as high risk?

The types of processing that have been identified as high risk are as follow:
- Content of the transcription following a consultation with a patient which will include data relating to the health of that patient

Scope of processing

2.8 What personal data is being processed? **Explanatory note:** Provide all the data fields that the product will process.
- Patient's demographic details (name, date of birth, gender) - Patient's NHS number - Healthcare professional's email address - Audio stream from consultations (processed in real-time during conversations and <u>automatically deleted</u> as soon as the audio is transcribed) - Transcription of consultation - Outputs generated (letters, clinical notes)

2.9 From the data fields provided, are there any special category or criminal offence data being processed?	
☑ ~~Yes~~	☐ No

2.10 What are the volumes of data that are being processed? (To be filled in by the Controller depending on their patient size list)

2.9 What is the frequency of processing?
Data will be processed daily as long as the Data Controller uses the Accurx Scribe feature to help assist with consultations.

2.10 How long will this data be retained for?
The audio stream is processed in real-time during conversations and <u>automatically deleted</u> as soon as the audio is transcribed by Accurx Scribe. This ensures that the audio, which is highly sensitive, is not retained any longer than necessary to fulfil their purpose. All other outputs generated by Accurx Scribe, such as transcriptions, clinical notes, and summaries, are retained as personal data for a period of 30 days. During this time, healthcare professionals can review these documents within the product and, where appropriate, save them to the patient's electronic medical record for permanent clinical use.

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After the 30-day retention period has passed, the vast majority of these outputs are permanently and securely deleted. A very small fraction, specifically those that have been substantially edited by the healthcare professional, are effectively anonymised (therefore no longer considered personal data) and used exclusively for clinical safety purposes — never for AI model training or any commercial use. Please see here for more information about how these outputs are processed for clinical safety purposes.

Context of processing

2.11 What is the nature of the relationship with the individuals?

The nature of the relationships with the individual is that of health and social care staff providing direct care to patients.

2.12 How much control will the individuals have over this processing activity? (To be filled in by the Controller)

The purpose of the Ambient Scribe feature is to improve the way consultations are carried out, which benefits both patients and healthcare professionals. The healthcare professionals using Accurx have access to our Terms & Conditions, Data Processing Agreement, Acceptable Use Policy and additional pages on our website which sets out how Accurx operates and the way their data is being processed. In terms of patients, the organisation for which the healthcare professionals work will need to decide how much control it wants to give their patients and how best to inform them about the use of the Accurx Ambient Scribe feature. In cases where patients do not want their data to be processed in this manner, they can choose not to by exercising their right to object to the Data Controller.

2.13 Would the individuals expect their data to be used in this way?

There is increasing awareness of the need and adoption of AI tools in healthcare to help deliver better outcomes for patients. The latest guidance from the UK Government recognises that the NHS will benefit from advancements in AI and digital technology to improve healthcare delivery, including reducing wait times, improving data sharing, and enhancing patient care. However, Accurx is aware of the wider concerns around AI, and particularly emphasised within the healthcare sector due to the sensitive nature of the data involved.

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Therefore, each organisation will need to decide how best to inform their patients of the use of this feature. In acting transparently and providing the necessary information to patients, the organisation would likely be handling patients' data in ways they would reasonably expect.

2.14 Will any personal data relating to children aged 13 or under be processed?

Yes, the nature of the relationships with the individual is that of health and social care staff providing direct care to patients, who will inevitably sometimes be children and part of other vulnerable groups.

2.15 Are there prior concerns over this type of processing or security flaws?

Yes, there are recognised inherent risks associated with this type of processing, which involves the use of AI technologies to transcribe and summarise clinical consultations. Key concerns identified in the wider sector include:

- **Accuracy**: AI systems may generate information that appears credible but is in fact false, misleading, or otherwise inaccurate.
- **Transparency**: There can be challenges in clearly explaining how outputs are generated in an easy to understand manner, making it difficult to understand, challenge, or explain outcomes.
- **Fairness (detrimental effects)**: There is a risk of harmful content being created by the AI system, including misinformation, hate speech, or otherwise discriminatory outputs.
- **Fairness (bias)**: There is a risk of potential biases within the AI model that could result in unequal treatment or outcomes for patients based on characteristics such as age, gender, ethnicity, or other demographic factors.
- **Automated decision-making**: There is a risk that decisions with legal or significant effects on individuals are made with the use of AI without human intervention.
- **Exposure of patient data**: AI systems may include models trained on patient data, or use it as part of continuous learning. This means patient data could be unintentionally exposed during the response to a prompt.
- **Security**: AI systems have complex supply chains which could be tampered with by a malicious actor which may result in unsafe or inaccurate model outputs.

These risks are typical of any AI-driven technology and are well-documented in regulatory and academic literature.

To address all of these concerns, Accurx has adopted a privacy and security by design and default approach when building the Accurx Scribe feature. This included carrying out in-depth and thorough due diligence to assess the risks and impact associated with this change to ensure compliance with the law and best practices, preserve patient safety, uphold our obligations as a supplier to the NHS and maintain Accurx's reputation as a trusted supplier

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within healthcare.

2.16 Is this a new way of processing data?

Yes, using the Accurx Scribe feature means that this will be a new way of processing data both in terms of the purpose, as well as the type of technology involved to carry out the processing, as explained below

- **New purpose** - while the overall objective of the Accurx platform remains, which is to improve healthcare communication with and about patients, the specific purpose for this feature is to provide automated solutions for recording, transcribing and summarising consultations, and generating content based on transcriptions to aid communication and enhance the way through which care is delivered to patients.
- **New technology** - the Accurx Scribe feature relies on the use of cutting-edge solutions in the field of what is known as generative AI, which differ significantly from our other Accurx features, and also from traditional consultation documentation approaches.
- **New nature of processing** - the way through which data is collected and utilised via the Accurx Scribe feature is a new form of data processing, which involves the use of AI models and is different to the other Accurx features.

Therefore, because of these factors, the use of the Accurx Scribe feature qualifies as a new way of processing data under the UK GDPR and Data Protection Act 2018.

2.17 What is the current state of technology in this area?

The Accurx Scribe feature is an Ambient Scribe tool, which is gaining traction across different areas of the NHS, particularly as part of the broader digital transformation agenda. These tools are being explored and piloted in GP practices and hospital trusts to support clinical documentation and streamline workflows. While adoption is still in early stages, interest is accelerating due to increasing pressures on healthcare professionals.

Ambient Scribe tools also align closely with NHS goals to reduce administrative burden on clinicians, improve care quality, and modernise IT systems.

2.18 Are there any current issues of public concern that you should factor in?

In addition to the risks and concerns identified by regulators and academia and listed in section 2.15, there have been public concerns over the processing and security of generative AI tools, which is the technology that powers the Ambient Scribe tools are, such as:

- **Data Protection, Privacy and Security** - ensuring that patient and health data is

protected due to its sensitive and confidential nature, as well as embedding privacy and security into the design of the tool in order to maintain the confidentiality, integrity and availability of the data.

- **Consent and transparency** - ensuring that patients are informed about the use of Ambient Scribes during their care, and can exercise their rights of such a tool being used to process their data.
- **Ethical use and patient trust** - ensuring that ethical concerns regarding the use of AI in healthcare is addressed, especially around patients being informed, and the potential for reduced human oversight in clinical decision making. Therefore ensuring that this feature enhances rather than replaces human interaction is crucial for maintaining patient confidence.

To address all of these concerns, Accurx has adopted a privacy and security by design and default approach when building the Accurx Scribe feature. This included carrying out in-depth and thorough due diligence to assess the risks and impact associated with this change to ensure compliance with the law and best practices, preserve patient safety, uphold our obligations as a supplier to the NHS and maintain Accurx's reputation as a trusted supplier within healthcare.

2.19 Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

We have a policy framework in place that aligns with information security and governance practices based on our certifications and guidelines from the following standards/bodies:
- ISO 27001:2022,
- NHS England (DCB0129, ODS code 8JT17), NHS DSP Toolkit,
- UK National Cyber Security Centre, Cyber Essentials.
- Our management systems are audited at least annually (externally) and more frequently internally.

Purpose of the processing

2.20 What do you want to achieve?

The Accurx Scribe feature aims to transform and enhance the quality of clinical consultations and improve care outcomes for patients. The feature enables real-time transcription of consultations, allowing clinicians to focus fully on their patients rather than dividing their attention between conversation and typing up notes. This creates a more engaged and person-centred consultation experience, which supports improved communication and better

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patient satisfaction.

From a workforce perspective, the feature is designed to also reduce the administrative burden on healthcare professionals by automating the generation of consultation notes and any associated documentation.

Overall, this will help improve both the quality of the consultation and the efficiency of post-consultation workflows.

2.21 What are the intended effects on data subjects?

The Accurx Scribe feature allows healthcare professionals to actively listen during appointments, rather than typing and writing notes and documents, which would have the following effects on patients: more personal and engaged consultations; improved communication and understanding; and stronger patient-clinician relationship.

From the medical studies who looked at the use of Ambient Scribe tools, the evidence seemed to support the claim that AI scribes enhance the clinician-patient relationship. Most patients were comfortable with the scribe's presence and perceived increased attention from their physicians.

The response from physicians who have used the ambient AI scribe service has been favorable; they cite the technology's capability to facilitate more personal, meaningful, and effective patient interactions and to reduce the burden of after-hours clerical work. In addition, early assessments of patient feedback have been positive, with some describing improved interaction with their physicians.

2.22 What are the benefits of the processing for all the entities involved?

The Accurx Scribe feature specifically allows healthcare professionals to focus on listening to their patients during consultations, rather than typing or drafting documents. By reducing administrative tasks, it helps them dedicate more time to patient care and improves the overall quality of consultations, bringing benefits such as better patient engagement and time savings for clinicians.

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Step 3: Consultation process [to be completed by the Controller]

Considering how to consult with relevant stakeholders

3.1 Are the views of the impacted data subjects and/ or their representatives being sought directly in relation to this processing activity?	
☐ Yes	☐ No

3.1.a) If the answer above is 'Yes', explain how that is being achieved?
This section to be completed by the Controller

3.1.b) If the answer above is 'No', what is the justification for not seeking their views?
This section to be completed by the Controller

3.2 Who else needs to be involved within your organisation in respect of this processing activity?
This section to be completed by the Controller

3.3 Do you need to ask your processors to assist? If so, which ones?
Accurx Scribe is provided by Accurx as a data processor and powered by Tandem Health AB as a sub-processor. Accurx completed a very thorough due diligence process before partnering with Tandem to ensure it meets our high standards for privacy, security, compliance and clinical safety. Our structured, comprehensive and robust due diligence framework enabled us to assess Tandem at corporate and product levels, including their: ● Information security posture, including their security certifications (ISO 27001 and Cyber Essentials), internal policies, and technical controls. ● Data protection practices, such as how personal data is handled, stored, accessed, and retained. ● Compliance with UK data protection laws, NHS DSPT (Data Security and Protection

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Toolkit), and other relevant regulatory standards.
- Company governance and accountability, including their registration with regulatory bodies (ICO), contractual obligations, subprocessor arrangements, and audit readiness.
- Product-specific risks, including a close review of how the AI system interacts with patient information — for example, how audio recordings are transcribed, how those transcriptions are summarised, where data is stored and processed, who has access at each stage, and how long it is retained.

As part of the due diligence process, we have also entered into a formal Data Processing Agreement (DPA) with Tandem, as required under data protection laws. This legally binding agreement defines Tandem's responsibilities as a sub-processor and ensures that it may only act on our documented instructions. The DPA sets out strict terms around confidentiality, data access, subprocessing, international transfers, security measures, and breach reporting. It also provides us with rights to audit and monitor Tandem's compliance on an ongoing basis. This agreement is a critical safeguard to ensure that any personal data handled on behalf of NHS organisations is processed lawfully and securely.

More details can be found on Accurx's sub-processors page

3.4 Do you plan to consult information security experts, or any other experts?

Accurx's Information Security team engaged SecureAI, a leading AI security and safety consultancy, to help develop a controls framework for using AI securely both internally at Accurx and within our product itself.

Step 4: Assess necessity and proportionality [to be completed by the Controller]

4.1 What is the lawful basis for the processing set out in Article 6 of the UK GDPR? Explanatory note: choose an option from the list below.

- ☐ 6(a) Consent
- ☐ 6(b) Contract
- ☐ 6(c) Legal obligation
- ☐ 6(d) Vital interests
- ☐ **6(e) Public task**

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☐ 6(f) Legitimate Interests

4.2 If processing special category data, what is the condition for processing?
Explanatory note: choose an option from the list below.

☐ 9(a) Explicit consent
☐ 9(b) Employment/ Social security
☐ 9(c) Vital interests
☐ 9(d) Not-for-profit bodies
☐ 9(e)Made public by the data subject
☐ 9(f) Legal claims or judicial act
☐ 9(g) Reasons of substantial public interest (with a basis in law)
☐ **9(h) Health or social care (with a basis in law)**
☐ 9(i) Public health (with a basis in law)
☐ 9(j) Archiving, research and statistics (with a basis in law)
☐ Not Applicable

4.2.a) If relying on conditions (b), (h), (i) or (j), you also need to meet the associated condition in UK law, set out in Part 1 of Schedule 1 of the DPA 2018.

This section to be completed by the Controller

4.3 Does the processing of the personal data actually achieve your purpose?

This section to be completed by the Controller

4.4 Is there another way to achieve the same outcome?

This section to be completed by the Controller

4.5 How will you ensure data quality and data minimisation?

Data quality and Accuracy
Accurx Scribe has several controls in place to ensure data quality and accuracy, such as:
- **Ensuring that all data is obtained from appropriate sources**: Accurx receives data directly from the patients and healthcare professionals during consultations, as well as from the Electronic Medical Record and/or the Personal Demographics Services (PDS).
- **Using AI models that have been appropriately tested for accuracy**: while no AI solution can guarantee 100% accuracy, Accurx Scribe uses AI models that have been

proven to perform at or above the level of human transcribers.

- **Implementing robust safeguards against 'hallucinations'**: Accurx Scribe leverages advanced voice activity detection to identify and disregard audio that is too quiet or unintelligible, as silence or background noise have been identified as one of the main causes of hallucination instances where an AI may insert words or phrases not present in the original audio).

- **Adopting a 'human-in-the-loop' approach**: once an output is generated using Accurx Scribe, the product displays enhanced in-product messages prompting healthcare professionals to review its content to ensure quality and accuracy, maintaining clinical oversight. This helps to ensure that every transcription, and any document derived from it (such as letters, clinical notes etc.), is reviewed, validated, and, if necessary, amended by a healthcare professional before being saved to the patient record or copied and pasted elsewhere.

- **Continuously improving the safety, accuracy and reliability of Accurx Scribe**: as an integral part of Accurx Scribe, there is a manual clinical review process of effectively anonymised outputs generated by Accurx Scribe. The process includes a clinical investigation into why those edits were made and the application of expert clinical judgment to determine whether the issue could have had any clinical safety implications.

Data minimisation

The Accurx Scribe feature only uses personal data that is adequate, relevant and limited to what is necessary in relation to the purposes. All generated data is only retained as personal data for a period of 30 days within the product, which is the period of time that was deemed appropriate to allow healthcare professionals to review these documents and, where appropriate, save them to the patient's electronic medical record for permanent clinical use.

4.6 What information will you give individuals?

This section to be completed by the Controller

4.7 How will you help to support their rights?

Accurx is committed to promptly assisting data controllers to comply with subject access requests and other actions needed to uphold data subjects' rights (described in Accurx's Data Processing Agreement).

4.8 What measures do you take to ensure processors comply?

This section to be completed by the Controller

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4.9 How do you safeguard any international transfers?

All personal data processed through Accurx Scribe is stored and handled exclusively within the European Union (EU). This includes all servers, databases, systems, and processes that Accurx relies on to provide the Accurx Scribe service. No personal data is transferred outside of the EU. This approach is intentional and carefully designed to ensure full compliance with the UK GDPR. Because the UK has a formal adequacy decision in place with the EU, personal data can lawfully flow from the UK to the EU without the need for additional safeguards such as international data transfer agreements. The adequacy decision confirms that the EU's data protection regime offers a level of protection that is "essentially equivalent" to that of the UK.

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Step 5 & Step 6: Identify and assess risks, and identify measures to reduce risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary, as well as identifying additional measures you could take to reduce or eliminate risks identified as medium or high risk.

Product (merge cells if needed)	Risk	Likelihood of harm	Severity of harm	Overall risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Accurx Scribe	The transcription generated might contain inaccuracies	Rem... ▾	Signifi... ▾	Low ▾	Accurx Scribe contains a range of built-in controls to help ensure the accuracy of all generated content. In addition to that, Accurx Scribe adopts a 'human-in-the-loop' approach. This means that after the transcript is generated, the healthcare professionals need to review to verify the information and make any edits they require. To ensure that this human review is carried out, the product also prompts users to check that they've reviewed the information and that it is accurate before proceeding to take any actions (such as saving that transcription to a patient's record, sending a	Reduced ▾	Low ▾	Yes ▾

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					referral letter, patient letter, etc.)			
	The microphone does not pick up all information from the consultation	Rem... ▾	Signifi... ▾	Low ▾	Accurx Scribe adopts a 'human-in-the-loop' approach. This means that after the transcript is generated, the healthcare professionals need to review to verify the information and make any edits they require. The product also prompts users to check that they've reviewed the information and that it is accurate before proceeding to take any actions (such as saving that transcription to a patient's record.	Reduced ▾	Low ▾	Yes ▾
	The transcripts of the consultations are accessed by unauthorised parties	Rem... ▾	Severe ▾	Medium ▾	All users must be logged in either via NHS SSO or through their NHS email and password to get access to the Accurx platform overall, not just the Ambient Scribe feature. Two-factor authentication is also mandatory at log in. Users of the Mobile Application (App) will also be required to set up a PIN or biometrics to access the App. They will be required to enter this every 15 minutes of inactivity in the App, reducing the possibility of	Reduced ▾	Low ▾	Yes ▾

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					malicious actors getting access to transcripts. Therefore, if an unauthorised person gets access to this data, it means that either their NHS SSO account was compromised or their credentials to the Accurx platform stolen. We've also implemented controls which blocks users using the Mobile App to take screenshots and screen recordings of consultations on mobile. We have comprehensive monitoring and alerting processes in place that scan for unusual user behaviour, so should an unauthorised party attempt to brute force a user's account, Accurx will get alerted immediately.			
	Sensitive patient information is leaked from language model	Rem... ▾	Severe ▾	Medium ▾	Accurx has Article 28 under UK GDPR compliant contracts and agreements in place with the sub-processors that power this feature.	Elimin... ▾	Low ▾	Yes ▾

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| | | | | | The agreement with the language model provider has specific clauses included that mandate them not to store or further use information sent to them.

As a result, the AI model that powers Accurx Scribe does not absorb, reflect or "learn" from any aspect of the conversation between patients and healthcare professionals during a consultation. Such information is:
● **never** used to update, retrain or fine-tune the AI model, remaining completely separate from the development of the underlying AI technology, and
● **always** kept private and confidential, with no influence on how the model behaves for others, now or in the future. | | | |
| | Tampering with Large Language Model resulting in harmful or offensive output. | Rem... ▾ | Signifi... ▾ | Low ▾ | Use of Large Language Models from a trusted supplier, with strong controls such as MFA and RBAC with regular reviews around access to any fine-tuned or custom models. | Reduced ▾ | Low ▾ | Yes ▾ |

	Tampering with training or testing data could result in unwanted or unaligned model behaviour.	Rem... ▾	Signifi... ▾	Low ▾	Strong access controls around training and testing datasets, with dataset versioning and change audit logs in place.	Reduced ▾	Low ▾	Yes ▾
	Transcription or notes generated from the transcription saved to the wrong users record.	Possi... ▾	Signifi... ▾	Medium ▾	Validation at point of save-to-record to ensure that the patient open in EMR is the same as the patient associated with the transcription/notes. Users using Accurx Scribe on the Mobile App, cannot save consultations to a patient's record.	Elimin... ▾	Low ▾	Yes ▾

Step 7: Sign off and record outcomes

Please note: As the data controller, when using accuRx, it is up to your organisation to complete a DPIA. As a data processor, we cannot complete it for you. However, to be as helpful as we can, we have filled in the key parts of this DPIA <u>Template</u>.

Item	Name/position/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion

accurx

Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons

accurx

Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA

accurx

Annex A – Commercial Pack for product functions
For products only – delete if not appropriate.