

**NHS Grampian**  
**Information Governance – Data Protection**  
**CORTI AI Pilot Study – Privacy Notice**

**What is happening and how is my data being used?**

Patient record keeping is an essential part of nursing practice. It is a communication tool, used to monitor and document the quality of patient care and serves as a legal record of care received. When patients are admitted or transferred to any care facility there are documentation processes which must be followed and this can be a lengthy process.

NHS Grampian Nursing Quality Assessment team identified a need to capture the clinical conversation digitally and automatically store it within the patient's electronic health record.

**Current Process:**

- On admission a nurse will interview the patient at their bed-side asking a series of set assessment questions.
- The nurse will either document the patient conversation at the time directly into the electronic patient records (EPR) or take written notes to add to the EPR later.
- Entering the information into the patient record can take on average 40 minutes to complete.
- The whole admission process can take up to 90 minutes

**Proposed Process:**

- The Corti Co-Pilot will support the Nurses during patient admission assessment by generating a transcribed account of the nurse/ patient conversation using AI technology that is populated into the Electronic Patient Record.

This is a pilot evaluation and any patient invited to participate in the study will be consented by the nursing team before allowing the transcription to begin. Patients will also be included, by the nursing team, in verifying the information Corti produces before it is transferred into their care record.

Corti was founded in 2016 and set out to create an intelligent system that works as an extension of the healthcare professional; taking away the stress of note-taking, coding and computer admin. This gives back time for medical staff to spend with patients. Co-Pilot

captures audio from conversation and summarises into medical terms, as used by NHS Grampian.

The main measurable benefit will be to reduce the time it takes a Nurse to conduct this assessment, while at the same time providing the ability to increase the quality of documentation due to a more detailed capturing of all information.

In addition, the Co-Pilot has the ability to record and store the conversation, making it easily accessible through a media player for nursing staff to review if required. This will provide security in patient audit situations and could potentially assist in training new staff.

For this initial phase of the project nursing staff will continue to complete the EPR section as normal. A comparison will then be done between the nurse data and the conversation report Corti produces to measure the accuracy.

### **Personal Data and Special Categories of Personal Data**

The personal data processed when using the digital transcription software could be your title, name, date of birth; email address and telephone number and details specifically related to your health and social care situation.

The data will be supplied from the conversation that you will have with the nursing staff on admission.

The personal data being processed is the minimum amount required to allow evaluation of the platform. It is required for identification purposes, to allow the technology to learn terminology and train using different voices, dialects and accents.

### **Data Controller**

NHS Grampian is the data controller for the personal data shared by you with NHS Grampian. Corti AI, the company providing the transcription software, is the data processor. Personal data and clinical data is returned to NHSG and is retained in the same way as the other medical information we hold about you. The AI tool processes data within the cloud, hosted by Microsoft Azure.

Corti AI and their approved sub-processors do not have routine access to your personal data. NHS Grampian have signed an Agreement with Corti AI setting out instructions and standards on how your information is processed by them and their sub-processors.

Company	Location	Services
Microsoft Azure	Amsterdam, The Netherlands & Dublin, Ireland (Back up)	Cloud Computing Services. All customer data is stored within Microsoft Azure and all services are run within their systems.
DataDog	Germany	Processing of usage telemetry data of Corti's applications.
Mixpanel	Eemshaven, The Netherlands	Processing of data of activity of users of Corti's frontend application.

Please see our full privacy notice for more information -

[https://foi.nhsgrampian.org/globalassets/foidocument/foi-public-documents1---all-documents/nhs\\_grampian\\_data\\_protection\\_notice.pdf](https://foi.nhsgrampian.org/globalassets/foidocument/foi-public-documents1---all-documents/nhs_grampian_data_protection_notice.pdf).

Corti AI and their approved sub-processors do not have routine access to your personal data however a limited number of Medical staff will have access to the network your data sits on for the purpose of remote support and learning. NHS Grampian have signed an Agreement with Corti AI setting out instructions and standards on how your information is processed by them and their sub-processors.

## Lawful Processing

This evaluation is being carried out in the course of our usual activities which are part of our public task in the provision of healthcare services.

We assert that it is lawful for us to process your personal data in this way as:

- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing is necessary for compliance with a legal obligation to which the controller is subject.

We assert that it is lawful for us to process special categories of your personal data (health and ethnicity) in this way as:

- processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social

care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards...;

- Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity.

## **Your Rights**

We respect your rights and preferences in relation to your data. If you wish to update, access, erase, limit, or complain about the use of your information, please let us know by emailing [gram.infogovernance@nhs.scot](mailto:gram.infogovernance@nhs.scot) in the first instance and we will consider your questions.

You may also wish to contact the Information Commissioner's Office for information on data protection, or to raise a concern or a complaint. Further information can be found on their website at [www.ico.org.uk](http://www.ico.org.uk).