

## **NHS Grampian**

### **Information Governance – Data Protection**

#### **GRACE - Chest X-ray AI assisted draft normal reporting**

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

NHS Grampian's (NHSG) is evaluating the use of Artificial Intelligence (AI) draft reports for "not significant" (Normal) chest x-ray (CXR) studies within the Radiology Department to understand the impact on radiology departments across NHS Grampian. If you have a chest x-ray done within the evaluation period, the image taken by our radiographers will be processed by Annalise Enterprise CXR and a draft report generated if there are no significant clinical findings.

##### **Current Process:**

Reporting radiologists use a standard blank template to manually enter report text into. The report is then reviewed before finalising.

##### **Proposed Process:**

Reporting radiologists continue to use a standard blank template to manually enter report text into however, if there are no clinical significant findings, a draft report will be visible to consultant radiologists who review and further edit the draft report as required prior to finalising the report.

The use of AI in the Annalise solution does not mean that the system is making decisions about you or your care by itself (i.e. this is not 'wholly automated' processing of your data). The draft report is still reviewed by the NHS Grampian consultant radiologist before finalising. All decisions concerning your care and treatment, and the responsibility for those decisions, remain with NHS Grampian health professionals.

##### **Personal data and Special categories of personal data**

The evaluation will be carried out over a three-month period. Only the chest x-ray image and the images' corresponding unique patient ID is processed by Harrison.ai.

## Data controller

NHS Grampian is the data controller for the personal data processed in this evaluation.

Harrison.ai, the company supplying Annalise Enterprise CXR is the data processor. The AI tool processes data within the cloud, hosted by Amazon Web Services (AWS). The Annalise.ai data centre is based in London.

NHS Grampian have signed an Agreement with Harrison.ai setting out instructions and standards on how your information is processed by them and their sub-processors, which includes additional contractual protection if your data is processed out with the UK and EU.

A list of Harrison.ai's agreed sub-processors and their processing role in this evaluation is as follows:

| Company                   | Location                                                                          | Services                                                                                                                    |
|---------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Amazon Web Services, Inc. | UK                                                                                | Cloud computing services and storage                                                                                        |
| Google Cloud Platform     | UK                                                                                | Cloud computing services and storage                                                                                        |
| CloudFlare, Inc.          | Customer traffic is processed globally at the data centre closest to the end user | Performance services                                                                                                        |
| Datadog, Inc.             | EU                                                                                | System and security log storage and monitoring                                                                              |
| Grafana, Inc.             | UK                                                                                | System and security log storage and monitoring                                                                              |
| Salesforce, Inc.          | 1) Australia<br>2) Australia<br>3) USA                                            | 1) Visualisation and dashboards for Analytics Data<br>2) Customer relationship management services<br>3) Marketing services |
| Qualtrics, LLC            | Australia                                                                         | Survey services                                                                                                             |

Harrison-AI Group Sub-Processors Harrison-AI's group companies below may also act as Sub-processors to the extent that these group companies process Customer Personal Information when providing technical and operational support to Customers.

| Entity                                              | Location       |
|-----------------------------------------------------|----------------|
| Harrison-AI Medical Pty Ltd (Harrison-AI Australia) | Australia      |
| Harrison-AI Medical UK Ltd (Harrison-AI UK)         | United Kingdom |
| Harrison-AI Medical Inc (Harrison-AI US)            | North America  |
| Harrison-AI Medical BV (Harrison-AI BV)             | Netherlands    |

NHS Grampian standard processes will apply in respect of the below mentioned data subjects' rights.

This data is retained in the same way as other medical information we hold about you.

Please see our full privacy notice for more information –

[https://www.nhsgrampian.org/siteassets/about-us/data-protection/data-privacy-notice/20260617\\_nhsg\\_principal\\_privacy\\_notice.pdf](https://www.nhsgrampian.org/siteassets/about-us/data-protection/data-privacy-notice/20260617_nhsg_principal_privacy_notice.pdf)

## **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.

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).