

# Ambient Voice Technology (Scribes)

Privacy Notice

## Summary

Penrose Health users may use Ambient Voice Technology (AVT), including AI-powered voice recognition and clinical note-taking tools, to support clinicians during consultations. AVT works in the background to help create clinical notes and reduce administrative burden, allowing clinicians to focus more fully on patient care.

AVT supports, but does not replace, clinical judgement. Our clinicians remain responsible for checking and approving all notes. If AVT is used during your consultation, you will be informed in advance. You can choose not to have AVT used, and this will not affect your care in any way.

We ensure that all AVT systems meet NHS clinical safety, data protection, and information governance standards.

## Details of processing

### Purpose of the sharing

The use of AVT can assist in reducing clinical workloads

### Our responsibilities

We are committed to ensuring safe and ethical use of AVT:

- AVT does not replace clinical judgement. Clinicians review and verify all generated notes before they become part of your medical record.
- Only AVT systems that meet NHS Digital clinical safety standards and are listed on recognised NHS registries are used.
- All systems undergo formal clinical safety assessments (DCB0129/DCB0160), with risks documented and mitigated.

### Lawful basis for processing

AVT may be used for:

- Supporting clinical note-taking
- Generating structured clinical summaries
- Transcribing consultation dialogues
- Approved workflow optimisation tasks

AVT will not be used for:

- Recording outside a clinical context
- Covert audio capture
- Any purpose not explicitly authorised
- Exporting data into unauthorised electronic systems or storage locations

### Recipient or categories of recipients of the shared data

#### When AVT is used:

- Only NHS-approved and secured devices are used.
- Data is stored and processed within authorised NHS-compliant environments.
- No information is transmitted or stored outside approved secure systems.
- Suppliers must meet strict NHS requirements for security, auditability, and responsible handling of audio and transcript data.
- All processing complies with UK GDPR, NHS information governance standards, and local data protection policies.

We may share information with the following organisations with your explicit consent or when the law allows e.g., South East London Integrated Care System, NHS England, GP Federations.

#### Retention period

Data is retained until the consultation notes have been completed and uploaded into your record.

## Your rights

#### Right to object

Under UK data protection law, you have the right to:

- Be informed about how your information is used
- Be told when AVT is being used during your consultation
- Choose not to have AVT used (opt out) without affecting your care
- Access your medical records
- Raise concerns about how your data is handled

#### Right to access and correct

You have the right to access any identifiable data that is being shared and have any inaccuracies corrected.

#### Right to complain

You have the right to complain to the Information Commissioner's Office. Contact information can be found on the Privacy page of our website.