

Heidi Data Privacy Impact Assessment summary

Context

Heidi Health processes and transcribes clinical conversations to generate clinical notes and documents. It leverages natural language processing (NLP), Large Language Models (LLMs) speech recognition technology, and machine learning algorithms. The DPIA is necessary due to the sensitive nature of health data, multiple access methods, integration with healthcare systems, and the use of AI technologies.

Important information

As a clinician, you need to be aware of the following information.

- Informed consent needs to be obtained from the patient.
- You must be aware of the limitations (such as transcription quality) and must ensure the accuracy of generated clinical documentation.
 - *Heidi should be used by qualified and registered clinicians to assist them in writing their clinical documentation.*
 - *Heidi should not be used as a clinical decision-making tool and is not a substitute for medical assessment.*
 - *Users must review all clinical documentation generated to confirm their accuracy before capturing it in their electronic medical records or distributing documentation to other clinicians and/or patients.*
- No audio is ever stored during clinical encounters (patient-clinician conversations); the audio stream is processed in real-time and immediately discarded. For dictation recordings (clinician audio only, captured outside of the clinical encounter), clinicians can opt-in to save their dictated audio for later review. It is important to note that the clinician is responsible for ensuring that no patient audio is included in any dictations.
- Heidi can collect personal data via their website (which is embedded in the mobile and desktop versions) if it serves the below purposes. This is your data provided as part of the sign-up process.
 - *When providing information about products and services you requested through email subscriptions, the lawful basis for processing is consent.*
 - *When providing related information about identified areas of interest, the lawful basis is legitimate interests.*
 - *When enabling individuals to exercise their rights over personal data, the lawful basis is compliance with a legal obligation.*

Data Privacy Impact Assessment review

Pinnacle has read and analysed the Heidi Data Privacy Impact Assessment (DPIA).

Broadly Heidi complies with laws, regulations and security standards across its architecture and processes. We are satisfied that Heidi collects only relevant data, stores it for an appropriate time, and has measures in place to ensure the privacy and security of the system.

There are risks to using this system as there are with any system. Heidi's risks include unauthorised access, data breaches, and inaccuracies in transcription. Measures to reduce risks include strict access controls, regular security training, encryption, redundant systems, and regular updates.

Overall, we feel these risks are adequately mitigated, but as with all risks, none can be completely removed.

If you would like a more comprehensive look at the Heidi system, please contact Heidi for their Data Privacy Impact Assessment.