

Shoalhaven Psychology Services

AI Policy

As at September 2024

1. Shoalhaven Psychology Services' commitment to the legal, ethical and responsible use of AI:

- 1.1. Shoalhaven Psychology Services ("us", "we" or "our") is committed to using AI to improve the health outcomes of patients, in a way that is legal, ethical and responsible.
- 1.2. The purpose of this AI Policy is to create a set of guiding principles that comply with the legal and ethical obligations that govern the responsible use of AI applications by clinicians.
- 1.3. Shoalhaven Psychology Services takes the privacy of clients' information seriously, and our Privacy Policy sets out how we collect and treat your Personal Information and Sensitive Information. Our Privacy Policy and this AI Policy operate together.
- 1.4. This AI Policy deals with both the general principles Shoalhaven Psychology Services is committed to in order to ensure the legal, ethical and responsible adoption and use of AI applications, as well as guidelines for the AI applications used by Shoalhaven Psychology Services to ensure the use of those applications is of benefit to clients and promotes client health outcomes while protecting client data and information.

2. Definitions

In this Policy:

- 2.1. "AI" stands for artificial intelligence, and refers to the capability of a machine to imitate intelligent human behaviour.
- 2.2. "AI application" describes any software program that uses AI to perform tasks.
- 2.3. "Large language model" or "LLM" is a type of artificial intelligence model designed to understand, generate or manipulate human language. They are trained on very large amounts of text data and use statistics and machine learning techniques to generate text based on the input they receive.
- 2.4. "Generative AI" is a type of machine learning model that generates new content (for example, text, images, videos etc) as outputs.

3. Shoalhaven Psychology Services' Statement of Values and Ethics in the use of AI

- 3.1. Shoalhaven Psychology Services believes that with appropriate policies in place, AI can support the delivery of healthcare outcomes.
- 3.2. Shoalhaven Psychology Services believes that human-delivered care must never be replaced by AI, but that AI has the potential to assist in care delivery and improve client outcomes. AI is seen by Shoalhaven Psychology Services as a means to achieving the goal of improved healthcare, but can only support the psychologist and patient to reach this goal.

- 3.3. Improved patient health and well-being will always be the primary and guiding focus of the adoption of all AI applications by Shoalhaven Psychology Services. AI applications will only be adopted by Shoalhaven Psychology Services where this will genuinely contribute to improving health outcomes of patients.
- 3.4. The adoption and implementation of all AI applications by Shoalhaven Psychology Services will be patient-centred and used to benefit patients' health and well-being.
- 3.5. AI must never compromise the clinician's clinical independence or professional autonomy.
- 3.6. A registered health practitioner or otherwise appropriately qualified clinician must always be ultimately responsible for decisions and communications and should have meaningful involvement at all stages of the patient journey.
- 3.7. All AI applications implemented by Shoalhaven Psychology Services must uphold and support patients' rights to make their own informed healthcare decisions.
- 3.8. It is important to Shoalhaven Psychology Services to be accountable and transparent to patients, the health profession and the wider community about the use of AI in supporting clients' healthcare outcomes.
- 3.9. The application of AI in health care must never lead to greater health inequalities for any population.
- 3.10. Patients have the right to refuse to be involved in the use of AI.
- 3.11. AI applications will only be adopted by Shoalhaven Psychology Services after first establishing robust and effective frameworks for managing risks which ensure patient safety and guarantee the privacy for all involved. These frameworks will be bespoke to the AI application being adopted, and regularly and vigorously reviewed.
- 3.12. Shoalhaven Psychology Services will never establish protocols where the clinical independence of the clinician is undermined by AI or the final decision is made by a person in a non-clinical role with the aid of AI.
- 3.13. AI applications will not be used by administrative (non-clinical) staff.

4. Use of patients data and information

- 4.1. As outlined in our Privacy Policy, Shoalhaven Psychology Services may receive and store your Data.
- 4.2. Shoalhaven Psychology Services is committed to the protection of the privacy of patient health information.
- 4.3. Shoalhaven Psychology Services will always use AI in accordance with the Privacy Policy in place at the relevant time.
- 4.4. Shoalhaven Psychology Services will only adopt and use AI applications following a careful review of that application's approach to privacy, and has adopted a protocol of regular checking the application to ensure there has been no material change to the way client data and information is stored, used and deleted.
- 4.5. AI applications will not be used, disclosing a client's personal or sensitive information, without written consent from the client.
- 4.6. The disclosure of Health Information must be limited to initiatives that exclusively aim to provide the health service to the client and/or improve the clients health outcomes.

5. Complaints about our AI policy

- 5.1. If you have any complaints about our AI practices, please feel free to send in details of your complaints to:
admin@shoalhavenpsychology.com.au
- 5.2. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

6. Changes to our AI policy

- 6.1. Our AI Policy is subject to change.
- 6.2. Shoalhaven Psychology Services may modify this policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website, or through distribution by email. Please check back from time to time to review our AI policy.

7. Current AI applications in use

- 7.1. Shoalhaven Psychology Services will maintain a list of AI applications in regular use by its clinicians.
- 7.2. At present, Shoalhaven Psychology Services uses:
 - NovoPsych. A summary of NovoPsych and how it is used is set out below.

NovoPsych AI Scribe

- A. **What NovoPsych AI Scribe does:** NovoPsych AI Scribe is a note taking service that makes a note of what is said during a consultation or is dictated by the clinician after a client consultation, and then uses AI to produce and record a summary document of key information in accordance with ethical principles.
- B. **Why NovoPsych AI Scribe has been adopted:** NovoPsych AI Scribe will assist clinicians by recording all relevant information during a consultation. This information is often, especially in initial assessment consultations, quite broad and detailed. NovoPsych AI Scribe will ensure that the practitioner's focus will be on the client, and not on recording the information (beyond a handful of key points). This will enable the practitioner to focus on engaging with the client, providing better eye contact and open communication signals, as well as the delivery of psychological interventions, which will assist the client to establish a better therapeutic rapport with the practitioner and lead to better client outcomes. NovoPsych AI Scribe will also reduce the time spent by the practitioner in preparing records following the consultation, which will instead be allocated to a larger focus on treatment planning and preparation for psychological intervention.
- C. **What NovoPsych AI Scribe will be used for:** Client consultations and case consultation notes. NovoPsych AI Scribe will only be used by clinicians.
- D. **What NovoPsych AI Scribe will not be used for:** NovoPsych AI Scribe cannot and will not be used to make decisions in relation to client care. NovoPsych AI Scribe will not be used by administrative (non-clinical staff). Notes generated by NovoPsych AI Scribe will not be adopted as a part of the client's file without a careful review by the clinician, and a record of the person who reviewed the note.

- E. **Written consent:** NovoPsych will only be used with clients who have provided written consent for the use.
- F. **Accountability:** The clinician using NovoPsych will be responsible for adopting the notes made by NovoPsych. That is, the notes will not be automatically saved to the client's file, but will be reviewed for accuracy and completeness by the practitioner, who is ethically responsible for the client's records.
- G. **Key Points Notes:** The key point notes are an important safeguard in ensuring the notes generated by NovoPsych are accurate and record the important parts of all client consultations. During the consultation, the practitioner will make a record of the key points that must be included in the client's records. The practitioner will use these key points when reviewing the note prepared by NovoPsych, to ensure that the note is both accurate and complete. In this way, each note will have an independent human lead review to ensure that case notes created by Heidi Health are at least as good as the notes that would have been recorded by the practitioner during the client consultation.
- H. **Transparency:** for internal record-keeping purposes, content created with the assistance of NovoPsych will be labelled as such, by including a note like the following: "Case note [or other appropriate description of document] created with the use of NovoPsych, and reviewed and adopted by [clinician's name]."
- I. **Data storage by NovoPsych:** NovoPsych will store a recording of the client consultation or practitioner's dictation on local servers in Australia. Although the data can be stored for longer periods of time, Shoalhaven Psychology Services will set a mandatory timeframe for all data to be deleted within 7 days. NovoPsych has been carefully selected by Shoalhaven Psychology Services as it complies with the Australian Privacy legislation and the Australian Privacy Principles.
- J. **Authorised Use:** Only clinicians will have access to and use NovoPsych. Administrative staff will not use the application and will not have access to the system.
- K. **Assessment and Review schedule:** Shoalhaven Psychology Services is committed to a regular assessment and review of the adoption and use of NovoPsych. In addition to the contemporaneous review for accuracy and completeness conducted before the adoption of every single note created by NovoPsych, Shoalhaven Psychology Services will conduct a comprehensive random audit every 6 months. The purposes of the random audit include confirmation that the AI Policy is being adhered to, that the information contained in the AI policy in relation to each AI application adopted is correct and up-to-date, and that the notes generated after consultations are both accurate and complete.