



# Connections

## Artificial Intelligent Addendum Document Policy 1.0

Version	Date	Author	Comments
1.0	December 2025	Jules McDonald, Bret McDonald & Emily Heys	Written

### 1. Purpose of This Addendum

This addendum explains how Connections Neuro Services (CNS) may use Artificial Intelligence (AI) or automated digital tools when providing care and administrative services. It sits alongside our Data Protection Policy, Consent & Mental Capacity Policy, and Privacy Notices. CNS is committed to using digital technologies safely, transparently, and in a way that protects the rights, dignity, and privacy of all individuals.

### 2. How CNS May Use AI Tools

CNS may use AI-enabled systems for limited purposes such as:

- administrative support (e.g., scheduling, documentation assistance)
- clinical support tools that help analyse information or assist clinicians in decision-making
- monitoring or efficiency tools that help us manage service quality

AI tools will never be used to make final clinical decisions, assess capacity, or determine eligibility for services.

All AI-supported outputs are reviewed by qualified CNS professionals, who remain fully responsible for clinical judgement and decision-making.

### 3. Data Protection and Privacy

Any use of AI that involves personal data will comply with the UK GDPR and the Data Protection Act 2018. This includes ensuring:

- a lawful basis for processing any personal or sensitive data
- only the minimum necessary data is used (data minimisation)

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- personal data is stored securely and is not used to train external AI models unless explicitly permitted
- individuals are informed about how their data is used, stored and shared
- data subjects can exercise all their rights (access, rectification, erasure, restriction, objection)

Where sensitive health or neuro-related data is used with AI tools, additional safeguards will be applied.

### **4. Transparency and Client Information**

This document informs CNS clients, families and representatives that personal data may be processed using AI-enabled tools within the parameters set out in this document. Clients are encouraged to ask questions or request further explanation at any time. Clients will be notified, and consent gained, at start of access to services regarding use of AI within CNS services. This document will be available for all to access via the CNS website.

### **5. Data Protection Impact Assessments (DPIAs)**

Before introducing any AI system that processes personal or sensitive data, CNS will carry out a Data Protection Impact Assessment.

This ensures risks are identified, assessed and mitigated, including risks relating to privacy, bias, accuracy, explainability and safeguarding.

DPIA is attached as an Appendix to this document.

### **6. Safeguarding, Professional Oversight and Safety**

AI outputs will never replace professional expertise. CNS maintains the following safeguards:

- human oversight of all AI-supported processes
- clear recording, escalating and responding to concerns about AI-generated information

If an AI system produces an error or misleading output, CNS professionals will override it and take appropriate action.

### **7. No Automated Decision-Making**

CNS does not use fully automated decision-making or profiling that produces legal or significant effects on clients. All important decisions related to care, assessment, eligibility, or wellbeing are made by qualified staff.

### **8. Review and Accountability**

This addendum will be reviewed as required or whenever new AI tools are introduced. CNS will update clients and staff if changes are made. Responsibility for oversight of AI use sits with the Data Protection Lead.

### Appendix

## Data Protection Impact Assessment

### Data Protection Lead / DPIA Author

Data Protection Lead: Jules McDonald  
Organisation: Connections Neuro Services  
Completed By: Jules McDonald  
Date: 2<sup>nd</sup> December 2025

### Description

Use of AI Tools (ChatGPT, Microsoft Copilot, and AI-enabled clinical/administrative assistants) by clinicians at Connections Neuro Services (CNS) to support therapy documentation, assessment analysis, clinical note drafting, scheduling support and general administrative tasks. AI tools may process therapy notes, assessment results, and diagnostic information to assist clinicians while maintaining full human oversight.

### Purpose of the Processing

To support administrative efficiency, documentation accuracy, and clinical decision support with AI-assisted tools. AI tools are used only as decision-support aids and not as autonomous clinical decision-makers. Clinicians remain responsible for verifying accuracy and appropriateness of AI-generated content.

### Nature of the Processing

AI tools may temporarily process personal and sensitive information including therapy notes, assessment results, and diagnostic details. Processing occurs via cloud-based systems (Microsoft OneDrive, Microsoft Copilot, OpenAI ChatGPT enterprise-grade environments where applicable). Data is processed for the purpose of generating draft documentation, summarising information, or providing analysis to clinicians. No automated decision-making is used to determine care, capacity, or service eligibility.

### Types of Personal Data

- Therapy notes
- Assessment results
- Diagnostic information
- Client communication relevant to care
- Potential special category data: health and neuro-related information

### Categories of Data Subjects

- Clients / service-users
- Families or representatives when included in care notes
- Clinicians producing information for AI-assisted processing

### Lawful Basis for Processing

UK GDPR Article 6(1)(e) – Performance of a task carried out in the public interest  
UK GDPR Article 9(2)(h) – Health or social care provision  
Supplemented by: necessity for accurate clinical documentation and safe service provision.

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### **Risks to Data Subjects**

- Accidental inclusion of excessive or unnecessary personal data in AI prompts
- Risk of data being stored by external AI tools if strict controls are not followed
- Misinterpretation of AI outputs leading to clinical inaccuracies
- Unauthorised access if cloud access controls are insufficient
- Potential bias or inaccurate output from AI algorithms

### **Measures to Reduce or Eliminate Risks**

- Clinician skills and awareness on safe prompting and minimal data disclosure
- Prohibition on inputting identifiable client data into AI tools
- Use of Microsoft Copilot and enterprise AI tools with strong data protection controls
- No storage of client notes in ChatGPT unless using a compliant enterprise model
- Encryption of cloud storage (OneDrive)
- Mandatory human review of all AI-generated content

### **Data Retention**

AI tools will not store client data. Final records generated using AI assistance are stored only within CNS clinical systems and retained in accordance with CNS retention policies.

### **Data Sharing**

Personal data is not shared with AI vendors for training or commercial purposes. Data remains within CNS systems (OneDrive, Copilot environment) under existing Microsoft cloud protections. ChatGPT is used only in a mode/configuration where no data is retained or used for training.

### **Human Oversight**



All AI outputs are reviewed by CNS clinicians. AI is used only as a support tool. No decisions concerning care, risk assessment, or diagnosis are made solely on AI outputs.

### **DPIA Conclusion**

Residual risks are assessed as low to medium and acceptable with mitigation controls in place. CNS may proceed with the use of AI tools provided that:

- Staff follow safe prompting guidance
- Only approved AI environments are used
- No client-identifiable data is used in consumer AI platforms
- AI outputs are reviewed by clinicians
- Data protection reviews occur annually

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Authors	Jules McDonald, Bret McDonald & Emily Heys
Date written	2 <sup>nd</sup> December 2025
Review Date	December 2026
Print & Signed	<p>J McDonald</p>  <p>E Heys</p>  <p>B McDonald</p> 