GUIDANCE FOR THE USE OF GENERATIVE AI WITHIN PRIMARY CARE

Introduction

Generative AI (GenAI) is an exciting new tool that offers tremendous potential. As an emerging and continuously evolving technology, it brings with it new possibilities as well as significant challenges.

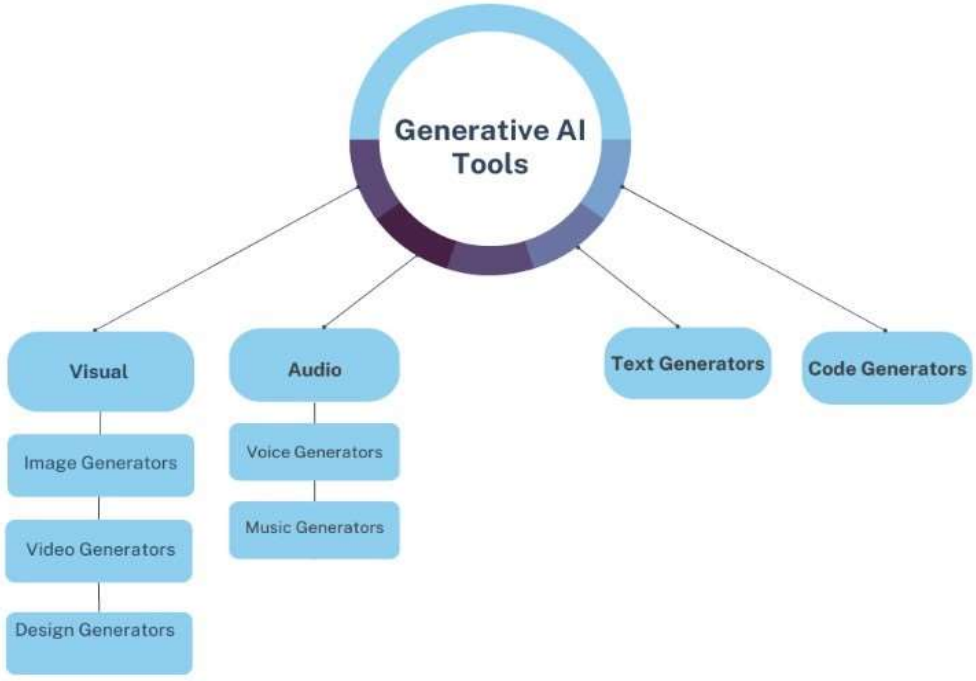
WellSouth recognises that a number of our primary care providers are using GenAI tools within their practice. We aim to support our providers by equipping them with the necessary guidance and resources to navigate the complexities associated with AI.

We also acknowledge that GenAI is a rapidly evolving field which means the processes will need to be layered and frequently revisited. Therefore, we encourage our providers to regularly review the risks and adapt their processes, as GenAI technologies and functionalities continue to evolve.

What is GenAI?

Generative AI (GenAI) is a subcategory of artificial intelligence that uses algorithms to generate new types of content or “outputs”, including text, images, music, code, and voice. This technology analyses large datasets to identify patterns and make decisions, operating on "prompts" the users provide to instruct it.

Unlike traditional AI, which focuses on recognising and processing existing information, GenAI creates new content based on what it has learned. Prominent examples of GenAI tools include ChatGPT, Dall-E, Nabla, Co-Pilot, and Heidi, each offering unique advantages, functionalities, and potential drawbacks. It is important to thoroughly evaluate these features to choose the GenAI tool that best aligns with your specific needs.



These tools can help increase productivity by saving time on repetitive tasks. However, as they are new and rapidly evolving, they also carry unknown risks due to their unproven nature.

Glossary of Terms

As Artificial Intelligence continues to advance, it introduces a range of new terms and concepts. This glossary is intended to provide clarity around commonly used terms associated with Generative Artificial Intelligence, please note this is not an exhaustive list.

Artificial Intelligence: Refers to the ability of computer systems to perform tasks that typically require human intelligence. It involves creating computer programs or machines that can think, learn, and make decisions like humans.

Traditional Artificial Intelligence (AI): Also known as "Narrow AI", this type of AI is designed to perform a specific type of task by following predetermined algorithms and rules. Because it is designed to handle limited tasks it cannot learn or adapt beyond its initial programming.

Narrow AI: Refers to AI systems that excel at very specific tasks, such as image recognition or navigating routes for delivery services. They are efficient in their designated areas but lack the versatility to perform tasks beyond their defined capabilities.

Generative Artificial Intelligence (GenAI): A type of AI that specialises in creating and developing new content. Instead of following explicit rules, GenAI learns patterns and

structures from extensive datasets using advanced machine learning techniques, such as Large Language Models (LLMs), enabling it to produce innovative content like text, images, and music.

Open AI: An AI research organisation focused on ensuring artificial general intelligence benefits all of humanity. OpenAI is known for the creation of tools like ChatGPT and DALL-E. Research and patents produced by OpenAI are generally intended to remain open to the public, except in cases where releasing them could pose safety risks.

Machine Learning (ML): A subset of AI that focuses on the development of computer algorithms that automatically improve through use and experience. Essentially, machine learning allows computers to learn from data and make decisions or predictions without being explicitly programmed to do so.

Deep Learning: An advanced subset of machine learning that structures algorithms in multiple layers to form an "artificial neural network." These networks are inspired by the human brain and are capable of processing complex layers of information. Deep learning systems learn from vast amounts of data, which allows them to make intelligent decisions independently.

Large Language Model (LLM): A complex deep learning model that is pre-trained on vast amounts of data to comprehend and generate human-like text. It utilises algorithms that employ sophisticated pattern recognition to predict the next word in a sequence, making them highly effective for applications that require natural language understanding. Known for their flexibility, LLMs are predominantly used in GenAI Chatbots to generate responses to human prompts.

Natural Language Processing (NLP): A branch of AI that uses machine learning to enable computers to understand, communicate, generate, and manipulate human language. It involves programming computers to process and analyse large amounts of natural language data, enabling them to recognise and generate text and speech.

Automation: The technology by which a process or procedure is performed with minimal human assistance. Often used in systems where repetitive tasks can be automated using AI or other technologies to improve efficiency and accuracy.

Application Programming Interface (API): A set of rules and protocols for building and interacting with software applications. APIs allow different software systems to communicate with each other, facilitating the integration and functionality of different software components. They play a crucial role in enabling software applications to access features and data from external services.

Pseudonymisation: A process that involves replacing personally identifiable information in a dataset with artificial identifiers or pseudonyms. Unlike anonymisation, which removes all personally identifiable information to prevent re-identification, pseudonymisation de-identifies the data while allowing the potential for it to be re-associated with the original identifiers under certain conditions.

Chatbot: A software application designed to simulate conversation with human users, often via text or synthesised speech. Chatbots can operate based on predefined response patterns or

more advanced algorithms incorporating Generative AI, enabling dynamic interactions that mimic human conversation. They are widely used in customer service, information acquisition, and interactive applications to enhance user engagement and operational efficiency.

What is the Regulatory Framework for AI in New Zealand?

AI is already deeply embedded in our daily lives, from virtual assistants like Siri and Alexa organising our schedules to services like Netflix and Spotify tailoring their recommendations based on our habits and interests. As AI technology becomes increasingly integrated into various sectors, understanding the regulatory landscape in New Zealand is essential. The regulatory framework here often focuses more on the responsibilities of the individual health practitioner rather than on product regulation.

Although there is currently no specific statute on AI, several existing laws still regulate its use. These include the Privacy Act 2020, the Human Rights Act 1993, the Fair Trading Act 1986 and the Harmful Digital Communications Act 2015. Additionally, the principles of Te Tiriti o Waitangi and directors' duties under the Companies Act 1993 are fundamental in guiding decision-making around using AI and setting up governance structures. One of the key challenges in regulating AI stems from the difficulty in agreeing on a definition that is both comprehensive and future-proof.

While the existing legislation provides a foundation, the rapid evolution of AI technologies necessitates further guidance. In response, the Office of the Privacy Commissioner has issued detailed guidance on applying the existing *Information Privacy Principles* to AI use. This guidance outlines clear expectations for agencies considering the implementation of AI tools. These expectations include:

- Obtaining senior leadership approval.
- Assessing the necessity of AI tools against the risks.
- Conducting Privacy Impact Assessments (PIAs).
- Maintaining transparency regarding AI tool usage and impacts.
- Engaging with Māori to discuss potential impacts.
- Developing procedures to ensure data accuracy and accessibility.
- Ensuring human oversight to review AI outputs.
- Safeguarding against the retention and disclosure of personal information.

We acknowledge Te Whatu Ora - Health New Zealand's statement on the use of AI within the healthcare sector. However, WellSouth appreciates and acknowledges that these tools may already be in use by our practices. We aim to support these practices in leveraging AI responsibly while ensuring high standards of patient care and data privacy.

Generative AI tools should not be used for clinical decision-making, particularly in areas such as generating differential diagnoses, suggesting medications and management strategies, or providing condition-specific or medication-specific patient education materials.

AI is happening now, and it is moving fast. To use AI tools responsibly, it is essential to establish a robust governance framework that supports the procurement and use of AI technologies without compromising patient care or privacy. It is important to consider the risks and implications carefully. We encourage you to independently assess these factors and make informed decisions regarding the suitability of GenAI for your specific needs.

What Are the Potential Medicolegal Considerations?

Accuracy of Notes:

- **Responsibility for Accuracy:** Any patient notes generated by GenAI are considered approved by the relevant clinician or staff member. All AI-generated work must be reviewed and, if necessary, edited by the appropriate personnel to ensure it is accurate, complete, and reflects the patient's care appropriately.
- **Professional Responsibility:** While AI tools can support medical notetaking and record management, they do not replace the professional responsibility of all relevant staff members to ensure that records are accurate, up-to-date, and securely managed.

Patient Consent:

- **Consent During Enrolment:** For new patients, include a clause in the enrolment form stating that AI tools may be used in their care. This initial notice helps integrate AI into your practice. However, explicit verbal consent must still be obtained before each consultation.
- **Verbal Consent:** Even with the enrolment form clause, obtaining verbal consent at the start of each consult is essential. This should be documented in writing in the patient's medical record.
- **Ongoing Consults:** For each subsequent consult, continue to document consent until it becomes routine for both the clinician and the patient. This is at the clinician's discretion and should be based on their relationship with the patient, considering each interaction on a case by case basis.
- **Layered Approach:** Implement a layered approach by using practice signage, providing an FAQ document, informing patients through the enrolment form, and consistently obtaining verbal consent at the start of the consult. While signage and documents are useful, they do not replace the need for explicit verbal consent.
- **Practice Policy:** Develop a policy for seeking and recording consent for AI use. This policy should outline the purposes for which AI is used and establish procedures for obtaining and documenting consent.

Security of Content:

- **Data Encryption and De-Identification:** Ensure that all patient information generated or processed by AI tools is encrypted and that it is pseudonymised or de-identified to protect patient privacy.

- **Data Storage Location:** Understand where this information is stored and if it is stored (even temporarily) on an overseas server. Storing data overseas may breach New Zealand privacy legislation if specific consent is not obtained.

Privacy and Storage:

- **Contractual Terms:** The contract between the AI provider and the user should address information security and compliance with New Zealand privacy laws.
- **Legislative Compliance:** Ensure any AI service provider meets legislative requirements as set out under the Privacy Act before using their services.

What Are the Opportunities and Benefits of Using AI?

Strengths		Examples
 Summarises Information	GenAI can quickly summarise and explain information in a clear manner, helping save time.	Summarise the key points of the morning huddle into an email to send to all staff.
 Automation of Tasks	It can be used to automate repetitive tasks and improve efficiency. Allowing staff to focus on more patient-facing care and other essential tasks.	Automate appointment scheduling and recalls, sending reminders to reduce DNAs. The use of chatbots to reply to common non-clinical questions on the practice website, such as opening hours, enrolment status, services offered, and appointment booking availability.
 Improve Accuracy and Reduce Human Errors	When programmed properly GenAI can help reduce human error and increase accuracy by making decisions based on gathered data and pre-defined algorithms. It provides a logical process to check user input at each step, operating consistently without fatigue or overlooking steps.	Highlight data fields in the patient records, such as allergies or smoking status, that were missed. Check spelling in clinical documents to minimise errors.
 Boosts Efficiency	GenAI enhances efficiency and productivity by streamlining processes and reducing the time and resources needed to complete tasks. AI systems can analyse data, predict outcomes, summarise information, and recommend improvements, which helps to optimise workflows and eliminate bottlenecks.	Condense the patient consultation transcripts into your chosen custom template, creating a detailed summary to copy into the patient's notes.

 Improves Patient Experience & Care	By simplifying administrative tasks, AI can enhance the patient experience and allow clinicians to stay fully engaged and present during consultations. Additionally, AI can facilitate quicker and more regular patient recalls, and can generate more detailed patient notes, thereby improving patient care and their experience.	Highlight outdated patient information to be updated, such as old contact details or blood pressure readings, ensuring clinicians have the most current and accurate data.
 Reduces Likelihood Burnout	By streamlining and automating repetitive tasks, GenAI can alleviate the burden of administrative tasks. Promoting a healthier work-life balance and reducing the risk of burnout among staff.	Streamline the process of generating standardised clinical documentation, such as discharge summaries or referral letters, allowing clinicians to focus more on patient facing care rather than non-contact clinical time.
 Creates Original Content	GenAI can generate original written and visual content, offering new ways to engage patients and staff. It can assist in creating educational materials, marketing content, or informative graphics, tailored to the needs of the practice. This can help save time and resources while ensuring consistent and professional-quality output.	Translate patient notes documented in medical shorthand into expanded, patient-friendly language. This is particularly useful for practices supporting open notes, ensuring patients can easily understand their medical information.
 Predictive Analysis	Leveraging historical data, GenAI can forecast trends, identify patterns, and predict future outcomes. This enables healthcare organisations to anticipate potential challenges and opportunities, facilitating proactive planning and informed decision-making.	Forecast patient admission rates to appropriately allocate resources. Identify trends in patient lab results, aiding in early detection and management of conditions.

What Are the Risks and How Can They Be Mitigated?

GenAI has the potential to transform how we deliver healthcare services. The benefits can include significant time and cost savings but there are still inherent risks that need to be considered and mitigated when implementing GenAI tools within your practice.

Risks		Examples	Mitigation Strategies
 Provide Inaccurate Information	GenAI tools can generate responses that seem credible but may be false or misleading, sometimes citing information or sources that don't exist (known as 'confabulation'). These tools may produce inconsistent answers to the same prompt and are not connected to live data sources, resulting in potentially outdated information.	Provide incorrect information about practice policies, such as payment plans or enrolment procedures, leading to confusion and potential issues with clear patient management.	**Human Oversight:** Implement a verification process where all information generated by GenAI is cross-checked with human oversight before being shared with patients or used in practice documentation. This process should be embedded into the practice through a policy on AI use, ensuring consistent oversight and accuracy in the information provided.

	GenAI **should not be used to make clinical judgements** as it is not a trusted clinical source.		
 Reinforce Inequities and Biases	GenAI models are often trained on large datasets that may under-represent or misrepresent minority populations, potentially reinforcing existing social and health inequities. These models can perpetuate biases inherent in the data, leading to discriminatory practices or exacerbating disparities in care. This concern is particularly relevant in our context, as the majority of GenAI models are developed overseas and may not adequately address the unique inequities present within our local landscape.	If the training data for a GenAI model lacks diverse linguistic and cultural representation, such as Te Reo Māori or various accents, it could introduce biases and affect the accuracy of the model's output. This can lead to misunderstandings, or misinterpretations and therefore incorrect outputs.	**Regular Audits:** Incorporate regular audits of GenAI systems to ensure they do not perpetuate biases or reinforce inequities. This should be a standard part of the AI policy within the practice. **Engage with Patient Groups and Local Iwi:** Actively seek feedback from your practice's patient engagement group and local iwi regarding the use of GenAI within the practice. This helps in understanding and addressing any concerns and working together to address these. **Transparency and Oversight:** Maintain transparency with patients about the use of AI tools, clearly communicating that it is used only in a controlled environment with human oversight. This builds trust and ensures patients are aware of how their data is being handled.
 Lack of Transparency	GenAI systems may operate as "black boxes," making it difficult to understand how they arrive at specific conclusions or recommendations. This lack of transparency can undermine trust and create challenges in validating the accuracy and reliability of their outputs. Users may not fully grasp the data sources or algorithms driving GenAI's decisions, which can complicate the process of ensuring that these tools are used ethically and responsibly.	When using GenAI to draft patient communication templates, the model may generate suggestions based on data it cannot fully explain or identify its source. If the recommendations are not transparent, staff might unknowingly incorporate biased or outdated information into patient interactions. This lack of clarity can make it challenging to understand how decisions are made and whether the content aligns with the practice's standards and values.	**Review Terms and Privacy Policies:** Examine the terms of service and privacy policies of all AI tools to understand their data handling and decision-making processes. **Conduct PIAs:** Perform Privacy Impact Assessments (PIAs) for each GenAI tool to evaluate how they handle data. **Regular Reviews and Audits:** Implement regular reviews and audits of GenAI use to ensure compliance and transparency.

			Provide Training: Train staff on how to interpret and critically assess AI-generated recommendations. Ensure they understand the limitations of these tools and how to seek additional information or clarification when needed. **Ensure Human Oversight:** Maintain human oversight to validate and interpret GenAI outputs.
Breach Data Sovereignty	GenAI models currently available in public forums are unlikely to respect or appropriately address New Zealand Health data sovereignty laws, particularly concerning Māori data sovereignty. Data sovereignty concerns arise when GenAI tools store or process data in locations outside of New Zealand. Such practices can lead to potential breaches of local data protection laws and regulations, which require that data involving New Zealand citizens be handled in compliance with New Zealand's privacy standards. If data is stored or processed on overseas servers, it may not be subject to the same protections, increasing the risk of unauthorized access or misuse.	Using a GenAI tool that stores patient records on servers based in the United States could potentially breach New Zealand's data sovereignty laws. This could be particularly problematic if the data includes sensitive information related to Māori patients, as it may not be handled in compliance with Māori data sovereignty principles. Explicit patient consent is required before using such tools.	**Review the Tool:** Carefully examine the terms of service and privacy policies of GenAI tools to understand where and how data is stored and managed. **Conduct PIAs:** Perform Privacy Impact Assessments (PIAs) for all GenAI tools to evaluate potential risks and ensure compliance with New Zealand legislation. **Seek Consent:** Obtain informed consent from patients before using GenAI tools that store or process data overseas, particularly when dealing with sensitive data. **Regular Audits:** Implement a regular auditing process to review the use of GenAI tools and ensure ongoing compliance with data sovereignty requirements. **Engage with Māori:** Consult with Māori data sovereignty experts or local iwi to ensure the practice's use of GenAI aligns with Māori data sovereignty principles.

 Invade Privacy	The use of GenAI tools can pose a risk of privacy invasion if personal or sensitive information is not handled appropriately. These tools often process large amounts of data, which may include patient details. If not properly managed, there is a risk that this information could be accessed by unauthorised parties, misused, or exposed inappropriately. Additionally, GenAI tools may inadvertently collect more data than necessary or lack sufficient safeguards to protect patient privacy.	Submitting private or clinical data to a GenAI tool may compromise confidentiality. For example, "please write an email to my patient, John Smith, stating that he has been diagnosed with Type 2 Diabetes." This approach is not best practice as it contains both private health information and clinical data.	**Avoid Inputting Sensitive Data:** Ensure that private or clinical information is not entered into GenAI tools. Use anonymised data instead. **Use Anonymised Data:** Where feasible, anonymise or de-identify patient data before inputting it into GenAI tools. **Check Terms of Service:** Review the terms of service and privacy policies of GenAI tools to understand how they handle and anonymise data before processing it. **Obtain Consent:** Ensure that patients are informed and provide consent regarding the use of their data with GenAI tools.
 Dependence on Technology	Over-reliance on GenAI for decision-making can lead to dependence on technology, potentially diminishing human expertise and decision-making capabilities.	In the event of a power outage or technical malfunction that renders the GenAI system inaccessible, employees may struggle to perform their tasks efficiently or make informed decisions without the assistance of the technology. This over-reliance on GenAI can lead to a situation where employees feel lost or unable to carry out their responsibilities effectively without the support of the technology.	**Maintain Human Oversight:** Ensure that GenAI tools are used as supportive aids rather than replacements for human judgement. Staff should always review and validate AI-generated recommendations and outputs. **Backup Procedures:** Develop and implement backup procedures and alternative methods for tasks and decision-making in case the tool fails or power outages. **GenAI Policy & Business Continuity Plan:** Ensure that your GenAI policy outlines protocols for managing technology dependence and includes contingency plans, such as regular backups, and a shift to manual paper systems.

Guided Steps for Introducing Generative AI Within Your Practice:

This guidance outlines key considerations and recommended steps for integrating GenAI into your practice. It is designed to help you navigate the implementation process and conduct a thorough assessment of the benefits and challenges associated with GenAI in healthcare. By following this guidance, you can make informed decisions, protect patient data and privacy, and enhance your practice's capabilities in a responsible manner.

Central to this guidance is the importance of transparency. Before proceeding, it's essential to be transparent about the purpose, functionalities, and data handling procedures of GenAI. The following should be considered before adopting the use of GenAI:

1. **Define Purpose and Evaluate Needs:**
   - **Clearly Define the Purpose:** Start by outlining the specific goals and objectives you aim to achieve with the integration of GenAI tools in your ways of working. This could range from improving patient education, summarising data, and aiding research, to other relevant applications tailored to the organisation's needs.
   - **Assess Organisational Needs:** Identify the current challenges or areas that could benefit from GenAI. This assessment helps in understanding the specific applications of GenAI that would provide the most value to your practice.
   - **Set Clear Objectives:** Establish measurable goals that align with the practice's overall purpose and vision. These objectives will guide the selection and implementation of GenAI tools and ensure that they contribute meaningfully to the practice's operations.
2. **Research and Select Appropriate GenAI Tools:**
   - **Research Available Tools:** Explore different GenAI tools available on the market that align with your defined purpose and objectives.
   - **Read Terms of Service:** Review the terms of service for each tool your practice is considering, looking to understand how they process and store data, including compliance with data sovereignty and privacy regulations.
   - **Evaluate Compatibility:** Assess the compatibility of these tools with your existing systems, workflows, and practice values.
3. **Evaluate the Tool and Reliability:**
   - **Assess Credibility:** Conduct a thorough evaluation of the origin and credibility of this GenAI tool. Assess factors such as the reputation and credibility of the developer, and their level of expertise in the medical field, especially within the New Zealand context.
   - **Verify Data Handling Practices**: Ensure that the provider has robust data handling practices and that comply with relevant data regulations. Confirm that they follow best practices and legislation for data security and privacy.
4. **Regulatory Framework and Liability:**
   - **Understand Regulatory Framework:** Familiarise yourself with the regulatory framework surrounding GenAI and any professional guidelines on its use. This includes understanding your obligations, ethical considerations, and the legal landscape related to the use of GenAI in healthcare settings.
   - **Acknowledge Legal Responsibilities:** It's essential to acknowledge that the responsibility for the use of these tools rests with the organisation or individual employing them. Regardless of the extent to which GenAI is used your legal liabilities and obligations remain the same.

5. **Consider Clinical Validation and Accuracy:**
    - **Clinical Validation:** Determine if the tool has been clinically validated. Clinical validation involves testing the tool in real-world settings to assess its accuracy and reliability.
    - **Evaluate Performance:** Review the tool's performance, including its error rate, handling of ambiguous or unclear information, and overall effectiveness in clinical scenarios.
    - **Understand Scope:** Ensure that clinical validation focuses on the tool's understanding of medical context and language, rather than its suitability for making clinical judgments.
6. **Conduct Risk Assessment and Mitigation:**
    - **Identify Potential Risks:** Identify risks associated with the tool helps in preparing for possible issues.
    - **Evaluate Impact and Likelihood:** Determining the impact and likelihood of risks helps prioritise what risks need to be addressed and how.
    - **Develop Mitigation Strategies:** Create strategies to mitigate risks and ensure that you have a plan in place to handle potential problems.
    - **Conduct Privacy Impact Assessments (PIAs):** Assess how the GenAI tool affects privacy and data protection. PIAs help identify and address potential privacy risks before implementation.
    - **Integrate into Policies:** Embedding risk management into policies ensures ongoing adherence and adjustment as needed.
7. **Data Privacy and Security:**
    - **Compliance with Regulations:** Ensuring compliance with data protection regulations is crucial for safeguarding patient data.
    - **Mitigate Risks:** Implement security audits to help in minimising the potential for data privacy breaches. Assess the measures in place to safeguard the security and confidentiality of patient data, including how it is handled, stored, used, and protected.
    - **Transparency with Patients:** Be transparent with patients regarding data handling procedures. Ensure that the GenAI model does not store patient identifiable data and that all data undergoes anonymisation, de-identification, or pseudo-anonymisation processes to protect patient privacy and confidentiality.
8. **Bias and Accuracy:**
    - **Recognise Potential Biases:** Recognise that GenAI tools can have built-in biases or inaccuracies. Consider how the tool was trained and whether its data sources reflect the diversity of your patient population. Consider whether this is a New Zealand based tool or one developed overseas
    - **Monitor and Evaluate:** Regular monitoring and evaluation of the use of the tool will help identify and mitigate these biases over time.
9. **Necessity and Proportionality:**
    - **Assess Necessity:** Evaluate whether the use of GenAI is necessary and proportionate given the potential privacy impact.
    - **Consider Alternatives:** Explore alternatives and assess the necessity of implementing GenAI within the organisation.

10. **Human Oversight and Audits:**
    - **Ensure Human Oversight:** GenAI should compliment, not replace, human decision-making. Always involve human oversight to maintain accountability and address ethical considerations
    - **Regular Audits:** Implement an auditing process to verify the accuracy and appropriateness of the tool, especially when it is used to automated tasks. Audits should be integrated into your practice's policies and procedures for GenAI use.
    - **Verify Outputs:** Oversight is needed to ensure that all generated content is thoroughly reviewed for accuracy before it is finalised or incorporated into the patient record. This step is crucial to prevent errors or misinterpretations.
11. **Develop Policy and Implementation Plan:**
    - **Approval Process**: Before implementing GenAI tools, seek approval from the organisation's board, or the relevant decision-making body.
    - **Draft GenAI Policy:** Develop comprehensive internal policies and procedures that govern the use of GenAI in the workplace. These policies should outline clear guidelines for the ethical and responsible use of GenAI, including considerations for data privacy, security, and patient consent.
    - **Establish Implementation Procedures:** Define clear procedures for integrating GenAI tools into daily operations. This includes steps for onboarding, configuring, and maintaining the tools. Develop protocols for troubleshooting and addressing issues that arise during use
    - **Define Roles and Responsibilities:** Assign specific roles and responsibilities for managing GenAI tools, including overseeing compliance, handling data security, and addressing technical issues.
    - **Training:** Develop a training program for all relevant staff members to ensure they are knowledgeable about GenAI tools, their functions, and how to use them effectively. Include training on data privacy, security practices, and the specific protocols outlined in the AI use policy. Ensure this is built into induction training processes.
    - **Monitoring and Review:** Implement a system for ongoing monitoring of GenAI tools to ensure they are functioning as intended and delivering the expected outcomes. Schedule regular reviews of the GenAI policy and procedures to keep them up to date with technological advancements and regulatory changes.
12. **Patient Consent and Communication:**
    - **Obtain Informed Consent:** The patient must provide informed consent regarding the use of GenAI. Given the ambiguity around what constitutes adequate consent, we recommend a layered approach with multiple checkpoints.
    - **Document Consent:** Ensure that patient consent is documented in writing against their patient record, and that consent is obtained each time until it becomes a regular practice for both the clinician and the patient.
    - **Provide Accessible Information:** This may include updating enrolment forms to explicitly address AI usage, obtaining verbal consent before consultations, and prominently displaying information about AI on the practice's website, Facebook page, and in the waiting room. Offer a detailed FAQ sheet to address common patient queries about GenAI. The best method is to approach this as an opt-in service rather than an opt-out.

13. **Consultation and Feedback:**
    - **Engage with Your Patients:** Actively consult with consumers, including Māori and Pasifika communities, who may be impacted by the use of GenAI. Seek their feedback and input to ensure that the implementation of GenAI is culturally sensitive and inclusive. This can be achieved through practice engagement groups, patient experience surveys, or informal discussions.
    - **Consider Open Notes**: Consider adopting Open Notes, which allows patients to review their own medical notes, provide feedback, and request amendments. This practice fosters patient engagement, transparency, and collaboration in the use of GenAI tools, enhancing their overall care experience.
14. **Continuous Improvement and Feedback:**
    - **Stay Informed:** GenAI tools evolve over time. Keep up with updates and improvements to the tools being used. Provide feedback to developers regarding errors or areas for enhancement.
    - **Update Policies and Procedures:** Regularly review and update your internal GenAI policies and procedures to reflect new developments, best practices, and insights from the evolving technology landscape.
    - **Foster a Culture of Continuous Improvement:** Actively seek feedback from staff and patients through surveys or engagement groups. Use this feedback to make informed adjustments to practice operations and the use of GenAI tools, ensuring that they continue to meet the needs of your practice and patients.