


## Acceptable Use Guidelines for Microsoft (MS) Copilot, MS Teams Recording and Transcription, and Teams Premium

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*Issued By: AI Hub, Digital, and Privacy*

This document is a companion to the UHN GenAI guidelines, which covers use of all AI tools at UHN. Guidelines are reviewed and updated periodically to reflect the rapidly evolving landscape of using AI tools, especially in a healthcare environment.

### Top 7 Things to Remember When Using Copilot

1	To <b>ensure data protection</b> , you <b>must be signed into</b> Copilot with UHN credentials. Ensure you see the <b>green shield</b>  when using Copilot for any work-related purpose and especially before entering any <b>PHI, PI or CCI</b> in Copilot! The <b>green shield</b> ensures your information is not used to train Microsoft Copilot's algorithms.
2	Obtain <b>consent</b> before recording and/or enabling transcription of meetings
3	<b>Verify</b> content generated by Copilot
4	Copilot is <b>not</b> a tool that has been validated for the provision of clinical decision support
5	<b>Avoid</b> using Copilot to <b>access, copy, modify, or distribute protected (e.g. copyrighted) content</b> without proper consent
6	Use <b>professional judgement</b> and discretion to determine appropriateness of using Copilot
7	Include a <b>disclaimer</b> when submitting documents to professional organizations drafted using Copilot

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## 1.0 Introduction

UHN has made available MS Copilot, MS Teams Premium and MS Teams Recording and Transcription to help TeamUHN improve efficiency, quality and creativity. It is always the **responsibility of the end user to verify the output** of anything generated by Copilot. Users should take the following into account:

- the subject matter (e.g. is it sensitive, confidential or privileged?);
- consider whether its use will contribute to better outcomes for clients, patients, or improved productivity

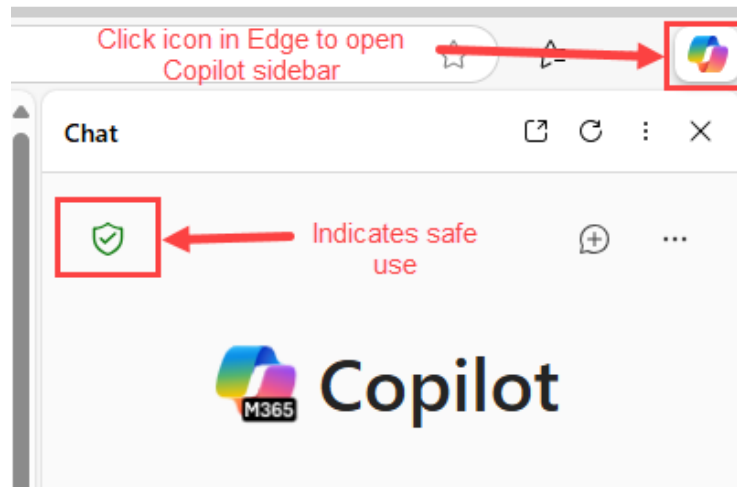
All members of TeamUHN are expected to use Copilot in accordance with the guidelines outlined in the following pages. If you have questions about the appropriateness of using Copilot for your work, speak with your manager.

This document outlines the acceptable guidelines for use of Copilot at UHN. It applies to all employees, physicians, researchers, students, contractors, volunteers, and applicable representatives using these tools for any UHN-related purpose. The guidelines aim to promote the responsible, transparent, and respectful use of Copilot, while minimizing the risks of misuse, error, or harm.

## 2.0 "UHN Signed-in" Version of Copilot and Privacy Considerations

Since TeamUHN often uses sensitive and confidential information, including personal information and personal health information, UHN has made available a version of Copilot that ensures information used in prompts remains in our protected environment and does not help train the public version of Copilot. **This is why it is imperative that you only use Copilot for UHN work when logged into the network.**

- Copilot at UHN may only be used where users have **logged in with UHN credentials**.
- Signing in with UHN credentials in the UHN signed-in version of Copilot is a secure and endorsed generative AI tool available to all users who have a UHN email.
- When you sign in with your UHN credentials, data protection is enabled, ensuring that no data is sent outside of UHN. You must see a green shield icon, as shown in the screenshot.



- As stated previously, all users of Copilot must ensure that they are properly logged into Copilot with their UHN credentials before usage. **Only "UHN signed-in" versions of Microsoft 365 Copilot hosted in UHN's Microsoft 365 Tenant can be used for UHN work-related purposes and especially where using Personal Health Information (PHI)/Corporate Confidential Information (CCI) and/or Personal Information (PI) or sensitive data.** To be clear, UHN **does not** consider the usage of public facing services such as Google Gemini, ChatGPT or any other public facing tool for clinical oriented or clinical related questions to be safe and within the confines of the [UHN Appropriate Use of Information & Information Technology](#). Unless applications are UHN approved, these tools cannot be confirmed to be safe and should **not** be used for PHI/PI/CCI. If you are considering an AI solution for clinical or corporate use (use in day-to-day operations), submit a [Digital Demand](#) to engage the Digital, Privacy and AI deployment team for evaluation and proper vetting.
  - Placing UHN PHI/PI/CCI in non-secured versions of Copilot (i.e. versions where you don't see the green shield) is a privacy breach and may be reportable to the Information Privacy Commissioner, and subject to disciplinary action.
- When using the "UHN signed-in" version of Copilot with UHN credentials, users should limit the inclusion of sensitive information (such as PHI, CCI, intellectual property or other sensitive data) to only what is necessary for their needs. Data should be de-identified to the greatest extent possible and anonymized wherever possible. (See UHN's De-Identification and Anonymized Data [Standard](#)).

### 3.0 Microsoft Teams Recording and Transcription and Privacy Considerations

- It is the responsibility of the meeting organizer/ chair(s) to ensure that only authorized individuals have access to the recording and/or transcription and to ensure the accuracy of any minutes distributed
- Users must obtain consent from all meeting attendees before recording or enabling transcription of a meeting and address any concerns raised regarding its use in the meeting.
- Special consideration should be made when patients/family caregivers are present in a Microsoft Teams meeting and Copilot is being used. Users should consider the appropriateness and any sensitivities before using Copilot in such cases. See the [Privacy & Access](#) policy for more information.
- When a meeting with a patient / family is transcribed or recorded, one of the clinicians participating in the meeting shall promptly prepare a summary of information relevant to patient care and uploaded it to UHN's Health Information System, Epic, and the summary will be made accessible via Patient Portal.
- Where users rely on Copilot to generate a summary of the meeting, users must review the summary to ensure accuracy, relevancy, and completeness before it is uploaded to Epic.
- Special consideration must be given to the recording and transcribing of sensitive meetings including but not limited to those involving PHI, PI, CCI, or as determined by the meeting chair(s) This includes evaluating the value and risk of recording and transcribing, restricting access to recordings and transcriptions, and anonymizing sensitive information.
- Users should consider that meeting recordings/transcripts, and hence material derived from such material, such as meeting summaries created by Copilot or Teams Premium, may be subject to public disclosure, pursuant to the *Freedom of Information and Protection of Privacy Act* and may be discoverable in in a legal proceeding. See the Freedom of Information page on the intranet to learn [more](#).
- Copilot might generate content that includes a variety of sensitive information, including personal information, personal health information, corporate confidential information and employee information, pulled from records that the user generating the content has permission to otherwise access. When sharing generated content with others, ensure that they are authorized to access any PHI, PI, or confidential information incorporated, or that such data has been scrubbed from the generated content.
- Unless there are exceptional circumstances (e.g. an ongoing or contemplated legal proceeding), users should securely dispose of the recording and/or transcript once the meeting summary has been reviewed, validated.

#### 4.0 Accountability, Accuracy and Verification

- Where possible, users should adopt a “verify then trust” approach to content generated by Copilot. Users should not rely on the authenticity and accuracy of this content and should, where possible, always validate its accuracy, quality, originality, and appropriateness before using, sharing, or publishing it. Users must not rely solely on Copilot to create content and must exercise their own professional judgement and critical thinking skills. Users are responsible for the Copilot generated content they share.
- If Copilot is being used in a meeting (Microsoft Teams) to summarize action points or take meeting minutes that will be distributed outside of the meeting, recipients should be notified that some or all the content was generated by Copilot. Review notes for accuracy before sharing and where appropriate, include a disclaimer: “*Generated by AI. Please verify for accuracy.*”
- Where the accuracy of Copilot generated content has not, or cannot be, independently verified, users should clearly communicate this. The following statement can be used when sharing the content: *The content of this [document, guideline, policy, etc.] was produced [in part/in full] with the use of Microsoft Copilot, its accuracy has not been independently verified.*

#### 5.0 Clinical Decision Making

- Health care providers are ultimately professionally responsible for their clinical decision making and should exercise caution and judgment in using information sources.
- Copilot is not validated as a clinical decision-making tool.

#### 6.0 Legal Privilege

- When lawyers are present in meetings, the discussion may be subject to legal privilege. Legal privilege exempts certain documents, and other forms of communication, from disclosure. If the meeting content is disclosed to persons outside of the meeting, this may result in the loss of privilege. To avoid this, check with legal counsel:
  1. before using Copilot in any meetings that include legal counsel, and/or
  2. distributing content generated by Copilot related to a meeting with legal counsel.
- Users must comply with all applicable laws, regulations, standards, and policies that govern the use, protection, and disclosure of information at UHN, including, but not limited to, the *Personal Health Information Protection Act*, the *Appropriate Use of Information & Information Technology Policy*, and the *Information Security Policy*.

## 7.0 Usage Permissions and Restrictions

- Users must not use Copilot to access, copy, modify, or distribute content that is protected by copyright, trademark, patent, or other legal rights, or that contains personal, confidential, or sensitive information, without the proper consent or authorization.
- Users should ensure that any input is either original, in the public domain, or used with appropriate permissions. UHN advises that users avoid sharing copyright text or proprietary content as part of their prompts as it may infringe on the rights of the original creators.

## 8.0 Disclosure for Research and Publications

- A disclaimer is not necessarily required every time Copilot is utilized to draft a document, email, or other record for internal usage. However, this is not true for submissions of documents to professional organizations, such as scientific and medical journals, granting agencies, and others. Most journals, for example, require explicit disclosure of the use of Generative AI in the methods section of a publication. When in doubt, check with the policies of the organization that is receiving any AI generated material.
- If Copilot is utilized for research analysis, it should be incorporated into the protocol.

## 9.0 Good to Know

Microsoft Copilot (“**Copilot**”) is a Generative AI tool, (based on ChatGPT models), that uses artificial intelligence (“**AI**”) to assist users in performing different tasks, such as writing text, analyzing datasets, creating or suggesting changes to documents, and summarizing content. To get this “virtual assistant” to perform a task, the tool relies on user input (called prompt engineering) as well as data that the AI model has been trained on to set the appropriate context of what it is supposed to perform. Because of the way the tools operate, different user prompts and underlying data that is accessible to the model may yield different results.

While AI tools can offer benefits such as improving productivity, quality, and creativity, they can also pose ethical and practical challenges. Examples include ensuring the accuracy, originality, and appropriateness of the AI generated content and respecting the intellectual property, privacy, confidentiality, and consent of the sources used by the AI. **It is always the responsibility of the end user to verify the output of anything generated by Copilot.**

## 10.0 Definitions

**Corporate Confidential Information (CCI):** Information used for UHN management, business, or financial purposes, including, but not limited to:

- information on salaries and benefits
- information on Hospital payments such as OHIP numbers
- information on Hospital budgets, expenses or planning
- patient health information or other data used by administration/management for logging, registering, scheduling, tracking, or billing patients
- sensitive or privileged legal information
- employee status information/communications regarding any employee
- information that could expose the organization's reputation to damage
- information regarding use of animals at UHN for research
- information regarding use of compounds or devices that could expose internal UHN operation to malicious acts by external parties (e.g. use of a compound or device that would signal to an activist group that certain types of experimentation are being carried out at UHN)

### **Generative AI**

A branch of artificial intelligence that refers to an AI system that is used to create new content data that is based on existing data or models, such as text, images, audio, or code.

### **Personal Health Information (PHI):**

Information about an individual, whether living or deceased, and whether in oral or recorded form. It is information that can identify an individual and that relates to matters such as the individual's physical or mental health, the provision of health care to the individual, payments or eligibility for health care in respect of the individual, the donation by the individual of a body part or bodily substance, and the individual's health number. (PHIPA 2004) PHI can be information about a physician or other care provider, a hospital staff person, a patient, or a patient's family member. Examples of PHI include a name, medical record number (MRN), health insurance number, address, telephone number, and PHI related to a patient's care, such as blood type, x-rays, consultation notes, etc.

### **Personal Information (PI):**

Any information about an identifiable individual, whether living or deceased, and whether in oral or recorded form, that is sensitive in nature. This refers to information collected or accessed by UHN for the purposes of employment or affiliation with UHN, with the exception of business contact information (e.g. information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number,

business address, business email, or business fax number of the individual). Examples of PI include, but is not limited to, ethnic origin, race, religion, age, sex, gender, sexual orientation, marital status, information regarding education, financial, employment, criminal history, social insurance number, home address, personal telephone number, etc.

### **Prompt Engineering**

The user directed design and refinement of tasks assigned to an AI tool such as Copilot to more effectively guide and retrieve the desired responses from an AI model.

### **Microsoft 365 Copilot**

A software application based on a Large Language Model that is integrated into various Microsoft 365 applications and uses Generative AI to help users write text, create and suggest changes to documents, analyze datasets, and summarize content.

### **Microsoft Copilot Chat**

A software application integrated into the Microsoft Edge browser and available as an app in Teams, Outlook, and M365 Online. Microsoft Copilot Chat uses Generative AI to browse the web, create short form content, summarize content, and can reason over uploaded files.

### **Teams Premium**

Teams Premium is an advanced version of MS Teams that offers enhanced features such as intelligent meeting recap which helps generate meeting summaries and action items after the meeting has ended, and provides AI-powered insights.

### **Teams Recording**

Teams Recording is a free tool available to TeamUHN. A video and audio recording of Teams meetings. Recordings will automatically include a Transcription by default.

### **Teams Transcription**

Teams Transcription is a free tool available to TeamUHN. A text-only record of a Teams meeting powered by speech recognition technology.

### **User**

Any UHN employee, physician, researcher, student, contractor, volunteer, or applicable representative using Copilot for UHN-related purposes.

## **11.0 Related UHN Policies**

[1.40.012](#) Appropriate Use of Information & Information Technology

[1.40.028](#) Information Security




[1.40.007](#) Privacy & Access

## **12.0 Restrict Access to Teams Meeting Transcripts and Recordings Instructions**

Instructions on how to restrict access to Teams Meeting Transcripts and Recordings can be found [here](#).

## Appendix

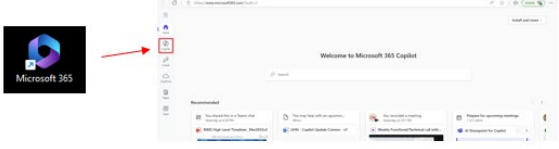
### 1. MS Tools Comparison: Copilot Chat, Recording & Transcription, Teams Premium, and M365 Copilot

Product	Description	When to Use
 <b>Copilot Chat (Copilot in Edge)</b>	<ul style="list-style-type: none"> <li>Free tool, available to all of Team UHN (automatically enabled)</li> <li>Must sign in with UHN credentials and includes enterprise data protection (data stays within UHN)</li> <li>Can be accessed through: <a href="https://m365copilot.com">https://m365copilot.com</a></li> <li>Provides AI-powered web search and answers, and summarizes information entered in Copilot Chat</li> <li>Can upload files for analysis</li> </ul>	<ul style="list-style-type: none"> <li>Research and summarize information quickly</li> <li>Recommend to try this tool first before requesting other paid options</li> </ul>
<b>Microsoft Teams Recording &amp; Transcription</b>	<ul style="list-style-type: none"> <li>Free tool; requested through Digital Service Portal</li> <li>Records and generates written transcript of meetings</li> </ul>	<ul style="list-style-type: none"> <li>Use it to record and transcribe meetings for later reference</li> </ul>
 <b>Microsoft Teams Premium</b>	<ul style="list-style-type: none"> <li>Paid tool costing \$10.02/month (costs subject to change)</li> <li>Enhanced version of Microsoft Teams; records, transcribes, and provides AI-generated meeting notes, tasks, and highlights</li> </ul>	<ul style="list-style-type: none"> <li>Use it to generate meeting summaries and action items <b>after</b> the meeting has ended</li> <li>Not all meeting participants need this tool; recommended for meeting chairs and/or organizers</li> <li><i>Not available yet beyond pilot users</i></li> </ul>
 <b>M365 Copilot</b>	<ul style="list-style-type: none"> <li>Paid tool costing \$48.85/month (costs subject to change)</li> <li>AI-powered tool integrated into M365 applications, that assists with work tasks by responding to user prompts with AI-generated information</li> <li>Can scan UHN emails, team chats, OneDrive, SharePoint documents (with access permissions), and the web for comprehensive responses</li> <li>Includes enterprise data protection (data stays within UHN)</li> </ul>	<ul style="list-style-type: none"> <li>Simplify complex documents and generate new ideas</li> <li>Transform long emails conversations into short summaries</li> <li>Creating first drafts and building on existing work</li> <li>Recommended for people who use M365 applications multiple times a day</li> <li><i>Not available yet beyond pilot users</i></li> </ul>

### 2. Access Methods for UHN Signed-in Version of Copilot


#### Windows Desktop Icon

- UHN has pinned a Microsoft 365 icon to the desktop for easier access




#### Copilot Chat within Microsoft Applications

- Within MS Teams, a Copilot Chat icon can be found on vertical bar on left side of the screen



#### Copilot Chat Website

- Visit <https://m365copilot.com> or find link on Intranet under Employee Tools



- Recommend this option for non-managed UHN devices
- The link will soon be available on UHN's AI SharePoint site*

#### Copilot Chat Sidebar in Edge Web Browser

- Open Microsoft Edge and click on the Copilot icon
- If not signed in, click the icon in the top left corner; sign in using UHN email address and password

