

# POLICY ON AI USE

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**Context:** *At the time of publication of this policy, we have been unable to find a publicly available formal AI policy from another complementary healthcare practice. Some practices might have internal guidance or data-protection policies covering AI, while conventional healthcare settings (such as NHS trusts) have recently begun to put AI governance in place, including published policies. However, clients are aware that many complementary practitioners are regularly using AI tools.*

*While professional bodies are beginning to issue some AI guidance to their members, we believe The Microbiome Group is the first complementary healthcare practice to publish its own client-facing AI policy. We want our clients, mentees and followers on social media to understand how and when we may use AI tools – and the boundaries we have in place to ensure trustworthy, ethical and legal use of AI and maintain excellence in our practice. This approach reflects our commitment to transparency and ongoing responsible innovation in all areas of our practice.*

At The Microbiome Group, everything we do rests on our clients' trust in us. We recognise the huge potential of Artificial Intelligence (AI). It's a powerful tool for efficiency, enabling us to maintain our primary focus on our clinical work, while the AI-human partnership is also advancing our understanding of the microbiome and what it means for human health. We all use AI in various ways, daily, professionally and personally. We welcome the growing presence of AI indexing our website and blogs, using our content as a source of detailed information on the microbiome as these systems generate answers for users around the world.

At the same time, we are also aware of AI's limitations and inaccuracies. As complementary healthcare practitioners, we are especially careful to ensure we never exaggerate claims about the benefits of Microbiome Analysis and our practice, and yet we also see the potential for AI use, especially on social media and in marketing, to mislead and misguide us and our clients.

This policy covers every area where AI touches our work – from clinical practice and protecting client data to social media and the content we publish. It goes beyond data protection requirements, beyond current professional body guidance, and beyond the scope of many AI policies in conventional healthcare. For us, that comprehensiveness is inseparable from our commitment to transparency.

What AI cannot access or replace is our thousands of hours of clinical experience or the specific knowledge and frameworks embedded in our professional qualifications and specialist trainings. Our clients' wellbeing and safety must be protected – and currently, clients have no way of knowing how their complementary health practitioner uses AI. This policy sets out our commitments to our clients and everyone who encounters our work, and publishing it is how we put our commitment to transparency and our clients' trust into practice.

## 1. Definitions and scope

- 1.1. Artificial Intelligence refers to computer systems designed to perform tasks that otherwise require human intelligence, such as reasoning, pattern recognition, decision-making, or language understanding. It includes Generative AI – a type of AI that can create new content, such as text, images, audio, or code, based on patterns learned from training data. In some healthcare settings, AI systems may analyse clinical data, automate workflows, or support administrative functions. AI tools may assist practitioners by analysing health-related data to provide insights or recommendations.
- 1.2. The policy includes both internally approved AI systems and publicly available AI tools, to ensure scientific accuracy, regulatory compliance, treatment efficacy and trustworthy representation of the benefits of microbiome analysis in practice.. It provides a governance framework for responsible AI use within The Microbiome Group practice, sitting alongside our existing professional obligations, regulatory requirements and clinical judgement rather than replacing them.

## 2. Privacy and confidentiality

- 2.1. We are fully committed to protecting our clients' privacy and confidentiality. As AI technologies, regulation and data practices continue to evolve, the ways health-related data may be stored, analysed, or reused can change over time. Microbiome data is among the most personal biological information a client can share – unique to each individual, it can already indicate predispositions to disease and offers real potential for optimising long-term health. Its commercial value is growing fast. Clients are encouraged to consider carefully before sharing microbiome or other health data outside the clinical setting.
- 2.2. We ensure our clients' microbiome data, case history or diagnoses, contact details or personal identifying details are not uploaded into any public or unapproved AI system. Instead, we draw on the wealth of expertise and extensive experience of our practitioner team, to ensure the best outcomes, without compromising client confidentiality.
- 2.3. All AI-related data processing is conducted in accordance with our Privacy Policy and applicable data protection legislation. Any approved AI tools are assessed for data security, confidentiality standards, and regulatory compliance before use.

### 3. How The Microbiome Group uses AI tools and why some areas of our work remain human-led

#### 3.1. Analysis of microbiome results and devising treatment plans

- 3.1.1. **Using AI to replace clinical judgement in microbiome analysis puts client health at risk.** The commitments in this section exist to ensure that never happens in our practice.
- 3.1.2. **We analyse all our microbiome test data ourselves.** We cannot rely on AI-assisted analysis to weigh up decisions that can only be based on clinical experience and expert insights, together with detailed knowledge of an individual's case history, dietary restrictions, lifestyle and other factors.
- 3.1.3. The microbiome is extraordinarily complex, and the AI-assisted analysis provided by testing companies plays a valuable role in identifying patterns across vast datasets that would be beyond human analysis alone. However, microbiome research is advancing rapidly and **our practitioners always return to the raw data, drawing on their own continuously updated knowledge of the latest medical research to verify and go beyond any AI-generated recommendations.**
- 3.1.4. **Our practitioners remain responsible for clinical judgement, treatment decisions and excellence in client care** – including accountability, evidence-based practice, risk management, ethical and legal compliance and maintaining high standards of clinical practice.
- 3.1.5. Our clients set up accounts directly with the microbiome testing companies we recommend and agree to those companies' own terms and conditions, including their data handling and privacy policies. **We recommend only testing companies whose privacy policies, data handling practices, scientific standards and reputation we have reviewed and continue to monitor,** though this is based on professional experience and direct review rather than a formal documented audit process. Clients should review those terms carefully before proceeding.
- 3.1.6. **Every treatment plan we devise draws on decades of clinical experience, thousands of appointments, and multiple professional qualifications and specialist trainings between us.** The depth of judgment this brings – weighing complex, individual factors, the nuances of individual case histories, and staying continuously current with fast-moving research – cannot be replicated by AI, which is why we do not use it to generate treatment plans.

## 3.2. Research and continuing professional development

3.2.1. Critical evaluation and verification are essential skills for high quality research and learning. We may use AI as a start-point in our research, such as efficiently gathering research data for us to assess. This includes the use of AI tools by individual practitioners for continuing professional development and clinical learning. We are aware AI makes mistakes and can 'hallucinate', and it does not yet accurately discern false or misleading information, so we will always check source information ourselves. We do not rely on AI to evaluate the quality of evidence or to complete the conclusions of our research or learning.

## 3.3. Social media, articles, courses and blogs

- 3.3.1. As complementary health practitioners, we are acutely aware of the scrutiny our field attracts – and we hold ourselves to a high standard of evidence in every clinical decision we make and every claim about our work. That commitment runs through our treatment plans to our social media posts. AI-generated health content – including social media posts, articles, books and courses – is proliferating rapidly, and standards of accuracy and evidence vary enormously. It is increasingly possible to publish at scale without directly engaging with the underlying research. Trust, integrity, honesty and authenticity are foundational to everything we do – from our consultations and treatment plans to our social media posts, blogs, articles, webinars and courses. It is essential to us that The Microbiome Group's educational content, tips and research findings can be fully trusted, and our use of AI never compromises that.
- 3.3.2. We use our own photography in our materials and content. On the rare occasions we use images taken by others, we clearly indicate this. This policy doesn't preclude us from adjusting or removing minor details from photos that distract from the main focus of the image, but we do not use AI to generate photographic images, audio or video, or modify photos or videos to present an image subject or context in a misleading way. If we conclude that AI-generated visuals (eg a diagram) would best communicate a topic, we will indicate that AI has been used, and check all aspects of that visual for accuracy and clarity. Our social media profiles are a space free from AI-generated photos or video.
- 3.3.3. To use our time efficiently, we may use AI to assist in drafting or summarising our own content. However, all content we publish is written or reviewed, edited and approved by a practitioner, and checked in detail for accuracy, regulatory compliance, and alignment with our professional and ethical standards before publication.
- 3.3.4. We will always complete content ourselves before posting or publication, and only draw on research that we have directly evaluated ourselves. This is also important because (according to our website statistics) AI systems index our blogs hundreds of

times each month, using our content to provide reliable microbiome information to users around the world.

- 3.3.5. Our online courses, webinars and programmes to support participants in their own microbiome health journey may include private group discussion spaces where participants share personal health experiences. **Programmes supported by practitioners may involve sensitive health discussions taking place online, in an AI-integrated environment, and participants will be informed of all relevant data processing before they enrol.**

### 3.4. Marketing

- 3.4.1. We use AI to support marketing ideation, to refine how we communicate our work, and to assess the reach and clarity of our messaging. **All marketing content is reviewed and approved by a practitioner before use.** We do not use AI to generate claims about the health benefits of microbiome analysis or the outcomes of our practice – these must be grounded in evidence we have directly evaluated and verified. The same standards of accuracy, integrity and honest representation that govern our clinical work apply equally to how we present ourselves in marketing.

### 3.5. Communication and administration

- 3.5.1. **All enquiries to our central email address are handled by a dedicated human assistant** who works closely with our practitioner team. We have decided not to install a chat bot on our website for now, as we are convinced our human assistant will give a more satisfying experience of the compassionate and individualised care we offer.
- 3.5.2. Our practice uses Google Workspace for communication and document management. This platform includes AI-assisted features – such as composing suggestions and automated summarisation – which we have reviewed and selectively retain where they support administrative efficiency. Any client data processed in this way is not used to train Google's AI models or shared outside our account. **All AI-assisted features are used for administrative efficiency only and do not inform clinical decisions or treatment plans.**
- 3.5.3. The computers, phones and other devices used by our team may include AI features built into the operating system or device software – such as text suggestions, document summarisation or notification analysis. These features are increasingly active by default across devices. Where they are enabled, they may process documents and communications for administrative purposes. **We do not use AI features integrated into our devices to actively process identifiable client data or to inform clinical decisions.**

- 3.5.4. We may also use AI to assist in drafting, developing and refining professional and practice documents (including policies, procedures, standards, manuals, agreements and guidance, for internal use or publication) as well as articles and other content submitted to external publications or professional bodies. **In all cases, the final document is written or reviewed, edited and approved by a practitioner before use, publication or submission.** AI is used to support drafting and development efficiency; professional judgement, accuracy and accountability remain entirely with the practitioner team.
- 3.5.5. We ensure Zoom's AI-assisted features (including meeting summaries and transcription) remain disabled for video consultations with clients.

### 3.6. Website and appointment scheduling

- 3.6.1. Our website and client booking platform is AI-integrated. We use it for scheduling, website management and booking administration only, and do not use its AI content generation features to produce clinical or client-facing content. Its data handling and privacy terms are consistent with our confidentiality commitments and data protection obligations.
- 3.6.2. Our payment processor uses AI solely for fraud detection and transaction security – it does not process health or clinical data.
- 3.6.3. We use AI to refine and optimise our website content for clarity, for standard search accessibility, and increasingly for AI-powered search and answer engines. All website content originates with our own expertise and is reviewed before publication.

### 3.7. Recording and transcripts

- 3.7.1. We do not record consultations or offer AI-generated notes or transcripts as a general rule. Instead, we maintain written clinical notes, and include relevant information in the individualised treatment plan sent to each client after their consultation. Occasionally, a client may request a recording or transcript of a consultation. Where appropriate, this may be agreed on a case-by-case basis. Written consent is required before any consultation is recorded or before any AI tool is used to listen to, transcribe or generate notes from a consultation. Any recordings, transcripts or AI-generated notes that are retained will be stored in accordance with our Privacy Policy and the client's consent. Any recordings are shared with the client using a secure link and deleted within seven days of sharing, unless retention is required for legal or regulatory reasons.

3.7.2. We do not actively use AI tools to synthesise or summarise identifiable client notes. However, we may use AI tools to assist in synthesising or structuring *anonymised clinical content* – for example when writing up case studies or clinical observations for publication or training purposes – where all identifying information has been removed before any AI tool is used.

## 4. Continued monitoring, governance and accountability

- 4.1. Practitioners remain professionally accountable for all clinical interpretations and recommendations, client communications, and any published material – whether or not AI is used.
- 4.2. Continued professional education is encouraged as AI technologies develop, and we will stay informed of new developments in AI to identify opportunities and risks.
- 4.3. We maintain an internal register of all AI tools and AI-integrated platforms used across our practice. Each tool is assessed before use for data security, privacy compliance, AI features active or disabled, and consistency with this policy, and existing tools have also been reviewed. The register is reviewed and updated whenever a new tool is introduced or an existing tool materially changes its AI features. The Director holds responsibility for monitoring material changes to AI features across all tools in the register, reviewed as a minimum alongside the six-monthly policy review. This register is available on request.
- 4.4. All new AI tools will require review by the Director of The Microbiome Group before use by practitioners, assistants or contractors, including full assessment of clinical safety, data protection, accuracy, and ethical considerations, scientific evidence, risks and benefits.
- 4.5. This policy is reviewed at least every six months, or sooner if significant developments in our current AI tools, AI technology more widely or regulation require it. **As AI continues to evolve, we will continue to evaluate its benefits for our practice and update this policy and register accordingly** – with our clients’ trust in our expertise and integrity remaining our top priority.

Any questions, concerns or comments about this policy, including how AI has been used in your care, should be directed to:

Viola Sampson, Director, The Microbiome Group [contact@themicrobiomegroup.com](mailto:contact@themicrobiomegroup.com)