

From streamlining patient care to enhancing clinical decision-making, healthcare AI technologies hold tremendous potential. However, with this potential comes ethical and security risks that must be managed at each step of the adoption journey.

This guide shares selected information about the World Health Organization's (WHO) AI ethics framework and the Open Worldwide Application Security Project (OWASP) AI security guidelines. From safeguarding patient data to preventing cybersecurity threats, this reference is designed to help healthcare organizations prioritize responsible, compliant and secure AI practices.

Aidoc makes no ownership claim over the material presented in this document. These streamlined guides have been adapted from publicly available resources to serve as a reference supporting best practices for responsible and secure AI adoption.

### **The WHO AI Ethics Framework**

The table<sup>1</sup> below translates the **WHO AI ethics framework** into practical, actionable steps tailored to each phase of the AI lifecycle. It outlines clear responsibilities for AI developers and corresponding actions for governments, ensuring alignment with ethical principles and regulatory standards.

| AI STAGE CONSIDERATIONS             |                                                   | DEVELOPER ACTIONS                                                                       | GOVERNMENT ACTIONS                                                                                                           |
|-------------------------------------|---------------------------------------------------|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| Developm                            | ent Phase                                         |                                                                                         |                                                                                                                              |
| (TI)                                | <b>B</b>                                          | <ul> <li>Provide certification/training<br/>for programmers</li> </ul>                  | <ul> <li>Have and enforce<br/>strong data protection laws</li> </ul>                                                         |
| Bias                                | Labor<br>Concerns<br>False<br>Labor<br>Safety and | <ul> <li>Perform data protection<br/>impact assessments</li> </ul>                      | <ul> <li>Issue target<br/>product profiles</li> </ul>                                                                        |
|                                     |                                                   | <ul> <li>Ensure refreshed, updated and<br/>context-appropriate training data</li> </ul> | <ul> <li>Mandate<br/>outcomes (predictability,<br/>interpretability, corrigibility,<br/>safety and cybersecurity)</li> </ul> |
|                                     |                                                   | • Ensure transparency of training data                                                  | <ul> <li>Introduce pre-certification<br/>programs to identify and avoid<br/>ethical risks</li> </ul>                         |
| Information or                      |                                                   | <ul> <li>Offer fair wages and support<br/>to data workers</li> </ul>                    | <ul> <li>Conduct audits during<br/>early AI development</li> </ul>                                                           |
|                                     |                                                   | <ul> <li>Involve diverse stakeholders<br/>in design</li> </ul>                          | <ul> <li>Require developers to address<br/>carbon and water footprints</li> </ul>                                            |
| Epistemic<br>Authority<br>of Humans | Exclusive<br>Control<br>of LLMs                   | <ul> <li>Design for accuracy<br/>and predictability</li> </ul>                          | <ul> <li>Require developers<br/>to label Al-generated<br/>content for users</li> </ul>                                       |



| AI STAGE CONSIDERATIONS  | DEVELOPER ACTIONS                                                                             | <b>GOVERNMENT ACTIONS</b>                                                               |
|--------------------------|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| <b>Development Phase</b> |                                                                                               |                                                                                         |
|                          | <ul> <li>Design for values based<br/>on consensus principles<br/>and ethical norms</li> </ul> | <ul> <li>Encourage or require<br/>early-stage registration<br/>of algorithms</li> </ul> |
|                          | <ul> <li>Design to improve energy<br/>efficiency of models</li> </ul>                         | <ul> <li>Invest in or provide public or<br/>not-for-profit infrastructure</li> </ul>    |
|                          |                                                                                               | • Promote open-source LLMs                                                              |

| AI STAGE CONSIDERATIONS |                                           | DEVELOPER ACTIONS | GOVERNMENT ACTIONS                                                                                                       |
|-------------------------|-------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------|
| <b>Provision Phase</b>  |                                           |                   |                                                                                                                          |
| (B°B)                   |                                           |                   | <ul> <li>Assign regulatory agency<br/>to assess and approve<br/>LMMs for health</li> </ul>                               |
| System-<br>Wide Bias    | False<br>Information or<br>Misinformation |                   | <ul> <li>Require transparency,<br/>including source code<br/>and data inputs</li> </ul>                                  |
|                         |                                           |                   | <ul> <li>Enforce data protection laws<br/>for user-inputted data</li> </ul>                                              |
| Manipulation            | Privacy                                   |                   | <ul> <li>Mandate ethical and human<br/>rights standards, irrespective<br/>of risk or benefit</li> </ul>                  |
| Automation<br>Bias      |                                           |                   | <ul> <li>Enact laws requiring impact<br/>assessments, audited by third<br/>parties and disclosed publicly</li> </ul>     |
|                         |                                           |                   | <ul> <li>Prohibit non-trial<br/>experimental use; explore<br/>regulatory sandboxes for<br/>controlled testing</li> </ul> |
|                         |                                           |                   | <ul> <li>Require developers to<br/>label AI-generated content<br/>for users</li> </ul>                                   |
|                         |                                           |                   | <ul> <li>Apply consumer protection<br/>laws to prevent negative<br/>impacts on end-users<br/>and patients</li> </ul>     |



| AI STAGE CONSIDERATIONS                        |                             | DEVELOPER ACTIONS                                                                                                              | GOVERNMENT ACTIONS                                                                                                                                                            |
|------------------------------------------------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Deployme                                       | nt Phase                    |                                                                                                                                |                                                                                                                                                                               |
| Inaccurate<br>or False<br>Responses            | or False Bias               | <ul> <li>Avoid using LLMs in<br/>inappropriate settings</li> </ul>                                                             | <ul> <li>Mandate independent<br/>post-release audits and<br/>impact assessments<br/>for LMM deployment</li> </ul>                                                             |
|                                                |                             | <ul> <li>Communicate known risks,<br/>errors and harms with clear<br/>warnings and measures</li> </ul>                         | <ul> <li>Hold developers or<br/>providers responsible for<br/>false or toxic information</li> </ul>                                                                           |
| Privacy                                        |                             | <ul> <li>Enforce affordability and<br/>availability by ensuring<br/>pricing and languages<br/>offered are inclusive</li> </ul> | <ul> <li>Enforce operational<br/>disclosures, including<br/>technical documentation</li> </ul>                                                                                |
| Labor and                                      | Automation                  |                                                                                                                                | <ul> <li>Train healthcare workers on<br/>LLM decision-making, avoiding<br/>bias, patient engagement and<br/>cybersecurity risks</li> </ul>                                    |
| Employment                                     | Employment Bias             |                                                                                                                                | <ul> <li>Facilitate public<br/>participation through<br/>human oversight colleges<br/>to ensure appropriate use</li> </ul>                                                    |
| Quality of<br>Clinician-Patient<br>Interaction | لے<br>Skills<br>Degradation |                                                                                                                                | <ul> <li>Engage the public to<br/>understand data sharing,<br/>assess social/cultural<br/>acceptability, improve<br/>Al literacy and gauge<br/>acceptable LLM uses</li> </ul> |
|                                                |                             |                                                                                                                                | Use procurement authority     to opposize transport                                                                                                                           |

 Use procurement authority to encourage transparency and responsible practices by value chain actors



# WHO AI Ethics Framework: Benefits and Risks of Large Language Models (LLMs) in Healthcare

Outlined below are the benefits and risks of using LLMs in healthcare as noted in the WHO AI ethics framework. Covering applications like diagnosis, patient support, administration, education and research it helps clinicians, administrators, developers and policymakers make informed decisions about leveraging LLMs responsibly and aligning their adoption with ethical and secure practices.

| USE CASE                             | POTENTIAL BENEFITS                                                                           | POTENTIAL RISK                                                                   |
|--------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| Diagnosis and<br>Clinical Care       | <ul> <li>Assist in managing complex<br/>cases and routine diagnoses</li> </ul>               | <ul> <li>Inaccurate, incomplete<br/>or false responses</li> </ul>                |
|                                      | <ul> <li>Reduce communication workload<br/>("keyboard liberation")</li> </ul>                | <ul> <li>Poor quality training<br/>data and bias</li> </ul>                      |
|                                      | <ul> <li>Provide novel insights from<br/>unstructured health data</li> </ul>                 | • Automation bias                                                                |
|                                      |                                                                                              | <ul> <li>Skill degradation in<br/>healthcare professionals</li> </ul>            |
|                                      |                                                                                              | <ul> <li>Informed consent challenges</li> </ul>                                  |
|                                      |                                                                                              |                                                                                  |
| Patient-Guided Use                   | <ul> <li>Improve understanding of medical<br/>conditions (patients or caregivers)</li> </ul> | <ul> <li>Inaccurate or<br/>misleading statements</li> </ul>                      |
|                                      | • Use a virtual health assistant                                                             | <ul> <li>Privacy concerns</li> </ul>                                             |
|                                      | Support clinical trial enrollment                                                            | <ul> <li>Reduced<br/>clinician-patient interactions</li> </ul>                   |
|                                      |                                                                                              | • Epistemic injustice                                                            |
|                                      |                                                                                              | <ul> <li>Risk of care delivery outside<br/>established health systems</li> </ul> |
|                                      |                                                                                              |                                                                                  |
| Clerical and<br>Administrative Tasks | <ul> <li>Streamline paperwork<br/>and clinical documentation</li> </ul>                      | <ul> <li>Potential inaccuracies<br/>or errors</li> </ul>                         |
|                                      | • Translate languages                                                                        | <ul> <li>Inconsistent responses<br/>to varying prompts</li> </ul>                |
|                                      | <ul> <li>Automate electronic<br/>health record updates</li> </ul>                            |                                                                                  |
|                                      | • Draft clinical notes post-visit                                                            |                                                                                  |



| USE CASE                                       | POTENTIAL BENEFITS                                                       | POTENTIAL RISK                                                                    |
|------------------------------------------------|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| Medical and<br>Nursing Education               | <ul> <li>Tailor adaptive educational<br/>texts to students</li> </ul>    | • Automation bias in learning                                                     |
|                                                | <ul> <li>Incorporate simulated<br/>conversations for practice</li> </ul> | <ul> <li>Errors or false information<br/>affecting education quality</li> </ul>   |
|                                                | <ul> <li>Provide reasoned responses<br/>for learning</li> </ul>          | <ul> <li>New digital skill requirements<br/>for educators and students</li> </ul> |
|                                                |                                                                          |                                                                                   |
| Scientific<br>Research and Drug<br>Development | <ul> <li>Analyze and generate insights<br/>from research data</li> </ul> | <ul> <li>Accountability for algorithm-<br/>generated content</li> </ul>           |
|                                                | Draft scientific articles                                                | <ul> <li>Bias in data favoring<br/>high-income countries</li> </ul>               |
|                                                | <ul> <li>Proofread and summarize</li> </ul>                              | <ul> <li>Generating false or<br/>non-existent references</li> </ul>               |
|                                                | <ul> <li>Aid in de novo drug design</li> </ul>                           | <ul> <li>Undermining peer review and<br/>scientific rigor</li> </ul>              |

### Systemic Risks of LLMs in Healthcare

|        | TYPE OF RISK                       | DESCRIPTION                                                                                                               |  |
|--------|------------------------------------|---------------------------------------------------------------------------------------------------------------------------|--|
|        | Overestimation of Benefits         | Over-reliance on LLMs may lead to<br>"technological solutionism," downplaying<br>safety, efficacy and utility challenges. |  |
| 1 St   | Accessibility<br>and Affordability | Lack of equitable access due to the digital divide or high subscription fees could widen disparities in care.             |  |
|        | System-Wide Biases                 | Larger datasets may encode biases that get perpetuated throughout healthcare systems.                                     |  |
| ۺ      | Labor Impact                       | Job loss and the need for workforce retraining may arise, alongside poor working conditions for data annotators.          |  |
|        | Dependence on<br>III-Suited LLMs   | Low-maintenance or regionally biased<br>LLMs can erode trust and privacy in<br>healthcare systems.                        |  |
| × ==== | Cybersecurity Risks                | Malicious attacks or hacking could<br>compromise the safety and trust in<br>LLM-dependent healthcare systems.             |  |



### OWASP LLM AI Cybersecurity and Governance Checklist: A Quick Reference Guide

The OWASP Top 10 Checklist helps leaders in tech, cybersecurity and compliance develop secure AI strategies while mitigating risks. It offers actionable insights aligned with global standards like GDPR and the EU AI Act, ensuring safe and effective AI adoption. Below are select sections from the checklist that complement the WHO AI ethics framework.

Explore the full OWASP AI resource for detailed strategies and best practices.<sup>2</sup>

#### **Adversarial Risk**

- Competitor Analysis: Scrutinize how competitors invest in AI to evaluate market impacts and opportunities.
- O **Defensive Controls:** Assess and update current controls, such as voice-based password resets, to counter attacks enhanced by generative AI (GenAI).
- Incident Response: Revise playbooks and plans to address machine learning (ML) and AI-specific threats and attacks.

#### (b) Threat Modeling

- Systematic Risk Identification: Use threat modeling to examine vulnerabilities and processes for AI systems.
- **GenAl-Accelerated Threats:** Anticipate LLM-assisted phishing and hyper-personalized attacks.
- Customer Protection: Mitigate risks from spoofing or malicious GenAI-generated content targeting clients.
- **Insider Threat Mitigation:** Implement safeguards against misuse by authorized users.
- **Content Filtering:** Automate mechanisms to prevent harmful outputs from AI systems.

#### Al Asset Inventory

- **Comprehensive Cataloging:** Identify all AI tools, services and data sources, tagging them for sensitivity and ownership.
- Software Bill of Materials (SBOM): Include AI components and dependencies for detailed tracking and management.
- **Risk Assessments:** Conduct pen testing and red teaming to evaluate attack surfaces.
- Onboarding Processes: Establish protocols for adopting AI solutions and ensure alignment with IT expertise.



#### 🖉 Al Security and Privacy Training

- **Employee Engagement:** Address employee concerns transparently about LLM initiatives.
- **Ethical and Legal Training:** Educate users on AI-related ethics, warranties, licenses and copyright issues.
- **GenAl Threat Awareness:** Update security training to address risks like voice cloning, image cloning and spear phishing.
- DevOps and Cybersecurity: Train teams on safe deployment and security assurances for AI tools.

#### 💮 Establish Business Cases

- Strategic Al Adoption: Develop strong business cases balancing risk, benefits and ROI for Al initiatives.
- Use Case Examples: Focus on customer experience, operational efficiency, market research, innovation and document management.

#### 🄝 Governance

- Accountability Framework: Create an AI RACI chart to define responsibilities and ensure transparency.
- **Data Management:** Implement policies for secure data classification and usage restrictions.
- O **AI Policies:** Develop acceptable use matrices and establish guidelines for generative AI tools.
- **Source Management:** Document the sources and processes governing GenAI data.

#### 🛅 Legal

- Liability and Warranties: Define clear terms in end-user license agreements to address Al-generated risks.
- Intellectual Property: Safeguard proprietary content and address risks from AI-assisted code generation.
- Regulatory Alignment: Ensure AI tools comply with laws regarding bias, plagiarism and data privacy.
- **Risk Mitigation:** Establish guardrails for indemnification provisions and evaluate insurance coverage adequacy.



#### 🖉 Regulatory

- **Jurisdictional Compliance:** Identify and adhere to AI-specific regulations, such as the EU AI Act and GDPR.
- **Employment AI Tools:** Evaluate tools used for hiring to ensure fairness, bias mitigation and data privacy.
- **Vendor Compliance:** Confirm third-party adherence to AI regulations and best practices.

#### العing or Implementing LLM Solutions ال

- **Trust Boundary Security:** Threat model LLM components and secure integrations.
- **Access and Data Controls:** Enforce least privilege access and classify data based on sensitivity.
- **Pipeline Governance:** Ensure rigorous control over training data and algorithm security.
- **Incident Response:** Update response playbooks to include LLM-specific attacks and vulnerabilities.
- **Audit and Monitoring:** Establish processes for automating, logging and auditing workflows.

#### Testing, Evaluation, Verification and Validation (TEVV)

- Lifecycle Continuity: Implement ongoing TEVV processes to maintain AI system reliability and security.
- **Executive Oversight:** Deliver regular updates on AI model performance, risks and robustness.
- **Proactive Adjustments:** Recalibrate and monitor AI systems periodically to adapt to evolving risks.

### **Explore More AI Governance Resources**

#### **On-Demand Webinars**

"Regulating the Future: A Deep Dive into Healthcare AI Governance" features healthcare and legal experts from Deloitte Consulting, American College of Cardiology and Epstein Becker Green explaining potential approaches to governance and essential considerations.

#### **Resource Guides**

The "5 Essential Areas of Alignment for Governing Clinical AI Partnerships" identifies key collaboration points with AI developers, while the "Clinical AI Readiness Assessment" helps evaluate healthy system readiness for scalable and secure AI, highlighting strengths and areas for improvement.

#### WATCH WEBINAR

### VIEW RESOURCES

#### EXPLORE MORE

AI Learning Center

The path from "what if" to "what's next"

requires careful planning. It's why we've

curated a Governance section within our

AI Learning Center to provide insights on

security considerations and regulatory

updates to guide your journey.

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#### References

1 Health Ethic & Governance. (2021). Ethics and governance of artificial intelligence for health. https://www.who.int/publications///item/9789240029200 2 Dunn, S. & OWASP. (2024). LLM AI Cybersecurity & Governance Checklist. https://owasp.org/www-project-top-10-for-large-language-model-applications/IIm-top-10-governance-doc/LLM\_AI\_Security\_ and\_Governance\_Checklist-v1.pdf