Capelfield Surgery

Privacy Notice: Use of Artificial Intelligence (AI)

1. Introduction

Capelfield Surgery is committed to protecting the privacy, confidentiality and security of your personal information.

We use artificial intelligence (AI) to support certain administrative and healthcare-related activities. This notice explains how we use AI, what information may be processed, why it is used, how it is protected and what rights you have under data protection law.

This notice should be read alongside the Capelfield Surgery Practice Privacy Notice, which provides further information about how we collect, use, store and share your personal and healthcare information.

If you have any questions about this notice or how your information is used, please contact the practice and ask to speak to the Manager or Data Protection Officer (DPO).

2. Why do we have an AI privacy notice?

Data protection law requires us to be transparent about how we use personal information, including when AI tools are involved.

This notice explains:
• Why we use AI and how it supports our services.
• What personal and healthcare information may be processed.
• The legal basis for processing your information.
• Who may access or receive your information.
• How your information is protected and how long it is retained.
• Your rights and how to raise a concern.

Using AI does not reduce our responsibilities under data protection law, our duty of confidentiality or our professional obligations to patients.

3. What AI tools do we use?

Capelfield Surgery currently uses InTouch AI, an AI-powered telephone assistant, to help patients contact the practice and manage their enquiries.

The service is intended to:
• Improve access: Help answer calls promptly and reduce waiting times.
• Support patient enquiries: Capture and manage requests in accordance with the practice's procedures.
• Support communication: Allow patients to explain their requests or describe their symptoms in their own words.

Information provided during a call may be passed to the appropriate member of the practice team, including the duty doctor where appropriate, for review and follow-up.

AI is used to support our services, not to replace the care and professional judgement provided by our staff.

If you would prefer not to use the AI telephone assistant, you can ask to speak to a receptionist. The practice will explain the available alternative arrangements.

4. What information may be processed?

The information processed depends on the nature of your enquiry and what you share during the call. It may include:

- Your name and contact details, where provided or required.
- Information you share during the telephone conversation.
- Details of your enquiry, request or reason for contacting the practice.
- Appointment-related information, where relevant.
- Symptoms and other health information you choose to share.
- Information generated from the call, such as a transcript, summary or record of your request, where applicable.
- Technical information required to operate, maintain and secure the service.

We aim to ensure that only information necessary for the intended purpose is processed.

Telephone recordings and other information associated with calls are handled in accordance with the retention arrangements applicable to the service. Audio recordings are retained for [insert confirmed retention period] and are then deleted in accordance with the provider's arrangements.

Transcripts, summaries or information arising from a call may be retained separately where necessary to manage your enquiry, support your care or meet applicable legal and NHS records management requirements.

5. How do we protect your information when using AI?

We recognise that personal and healthcare information is confidential and must be handled securely and responsibly.

Before introducing an AI service, we assess its intended use, the risks associated with processing personal information and the safeguards needed to protect patients.

Where required, we undertake a Data Protection Impact Assessment (DPIA) to identify and reduce risks to individuals' privacy and rights.

Our information governance arrangements consider:

- The purpose of the AI tool and how it is used.
- The type and sensitivity of the information processed.
- The security measures used to protect information.
- The organisations that may access or process information.
- How information is stored, retained and deleted.
- The risk of inaccurate, misleading or biased AI-generated information.
- The potential consequences of errors or omissions.
- How the service is monitored, reviewed and managed, including the handling of incidents.

Where AI generates information that requires verification, our staff review it and use it appropriately for its intended purpose.

We take appropriate steps to protect patient confidentiality and maintain suitable standards of care. AI does not remove our responsibility to handle information securely and lawfully.

6. Human oversight and clinical responsibility

AI supports the work of Capelfield Surgery but does not replace the professional responsibilities of our staff.

Where AI-generated information is used to support an enquiry or prepare information for a healthcare record, appropriate staff remain responsible for reviewing it and using it in accordance with their professional duties.

AI-generated information may contain errors, misunderstandings or omissions. Information that is relied upon for patient care must therefore be checked where appropriate.

Clinical decisions remain the responsibility of the relevant healthcare professionals, in accordance with their professional obligations and the practice's procedures.

We maintain appropriate oversight and governance arrangements for the AI services we use.

7. Our lawful basis for processing your information

Capelfield Surgery processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legal requirements.

We must have a lawful basis under Article 6 of the UK GDPR to process personal information. Where health information is processed, an additional condition under Article 9 must also apply.

Depending on the purpose and circumstances of the processing, the relevant legal provisions may include:
• Article 6(1)(e) UK GDPR: Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
• Article 6(1)(c) UK GDPR: Processing necessary to comply with a legal obligation, where applicable.
• Article 9(2)(h) UK GDPR: Processing necessary for the provision of health or social care, medical diagnosis or the management of health or social care systems and services, subject to the applicable legal requirements and safeguards.

The precise lawful basis and any additional conditions depend on the purpose of the processing and the arrangements applicable to the service. These are documented within the practice's information governance arrangements.

Using AI does not, in itself, change the legal basis for processing your information. We also comply with the common law duty of confidentiality and applicable professional standards.

8. Who may access or receive your information?

Where necessary and lawful, information processed through the AI telephone service may be accessed by or shared with:
• Authorised Capelfield Surgery staff who manage your enquiry or provide your care.
• InTouch AI, as the provider of the telephone AI assistant.
• Relevant service providers or subcontractors involved in delivering, supporting or maintaining the service, where applicable.
• Other authorised organisations, where sharing is necessary and lawful for the relevant purpose.

We require appropriate contractual, confidentiality and security arrangements for organisations that process personal information on our behalf.

Information is shared only where there is a lawful basis for doing so and the sharing is appropriate for the purpose concerned.

Information about the provider's data hosting arrangements, relevant subcontractors and any transfers of information outside the United Kingdom is available from the practice on request.

9. How long do we keep your information?

We retain personal information only for as long as necessary for the purpose for which it is processed, taking account of applicable legal requirements and NHS records management guidance.

Different types of information may be subject to different retention periods:
• Audio recordings: Retained for the confirmed period stated in Section 4 and deleted in accordance with the applicable arrangements.
• Transcripts and summaries: May be retained separately from audio recordings where necessary to manage your enquiry or support your care.
• Healthcare records: Information added to your medical record is retained in accordance with applicable NHS records management requirements and the practice's retention policies.
• Technical information: Retained in accordance with the relevant operational, security and retention requirements.

Where you would like further information about the retention of information associated with the AI telephone service, please contact the practice.

10. Your rights

Under data protection law, you have rights in relation to your personal information. These rights depend on the circumstances and may be subject to legal conditions and exemptions.

Your rights may include:
• The right to be informed: To understand how your personal information is collected and used.
• The right of access: To request a copy of the personal information we hold about you.
• The right to rectification: To ask us to correct inaccurate or incomplete personal information.
• The right to restriction of processing: To request that certain processing is restricted where the law allows.
• The right to object: To object to certain types of processing where the law provides this right.
• The right to complain: To raise a concern with the practice or complain to the Information Commissioner's Office (ICO).

You can contact the practice to exercise your rights or request access to your medical records.

We aim to maintain accurate healthcare records. You can ask us to correct factual errors in your records. However, there is no unrestricted right to have accurate medical information deleted simply because you disagree with it or no longer wish it to be held. Where appropriate, you may ask for your concerns or a statement of disagreement to be added to your record.

We will consider requests in accordance with applicable data protection law and our legal and professional responsibilities.

11. Data controller and Data Protection Officer

Data controller: Capelfield Surgery

Data Protection Officer: Dan Clement

Email: kmicb.ig@nhs.net

Capelfield Surgery is responsible for ensuring that personal information is processed lawfully, fairly and securely.

Our Data Protection Officer provides advice and support on data protection compliance and can assist with questions or concerns about how your information is used.

12. What should I do if I have a concern?

If you have concerns about how your personal information is being used by an AI service, please contact Capelfield Surgery in the first instance.

You can ask to speak to the Manager or contact the Data Protection Officer using the details provided in Section 11.

If you remain dissatisfied after raising your concern with the practice, you can complain to the Information Commissioner's Office (ICO), which is the UK's independent data protection regulator.

Further information is available at: https://ico.org.uk/for-the-public/

You can also contact the ICO by telephone on 0303 123 1113.

13. Review of this notice

We review this notice periodically and update it when necessary to reflect changes in our use of AI, our services, our information processing arrangements or applicable data protection requirements.

This notice supplements the Capelfield Surgery Practice Privacy Notice and should be read alongside it.

Last reviewed: 29 October 2026
Next review date: 29 October 2027