



PAM Group

PAM Group Ltd

Privacy Statement – AI Addendum

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Document Change Control

Version	Date	Author	Change Detail
0.1		Head of Cyber	
0.2	03/07/2026	Head of Data with DPO input	Review first draft and amended in line with Data Protection advice and guidance
0.3	06/07/2026	Head of Data	Small tweaks to improve readability & flow
0.4	06/07/2026	DPO	Reviewed to ensure completeness
0.5	14/07/2025	Head of Data	Added retention information following COO confirmation.
1.0	14/07/2025	DPO/Head of Data	Reviewed and Published

Policy Owner: Head of Data

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Approved by: COO

Distribution: External

For any queries regarding this policy, please contact the policy owner.

1. Purpose

This statement is to provide clear and accessible information about PAM Group's use of Artificial Intelligence (AI) in the delivery of its occupational health and wellbeing services. It is published in accordance with the transparency requirements of the UK General Data Protection Regulation (UK GDPR) Articles 5(1)(a), 12–15, and the Information Commissioner's Office (ICO) guidance on AI and data protection.

2. Scope

This statement applies to all individuals whose personal data is processed by PAM Group in the course of delivering occupational health and related services. This includes employees referred by client organisations, self-referring individuals, and client contacts involved in consultations. It applies to PAM Group's operations in the United Kingdom and, where PAM Group's Irish entities are involved, within the Republic of Ireland.

3. How PAM Group Uses Artificial Intelligence

PAM Group uses AI in two defined and limited areas of its service delivery: referral triage support and clinical consultation transcription. In both cases, AI is used only to assist qualified staff, and it does not make decisions, provide clinical advice, or act without human review. This processing does not produce legal or similarly significant effects for you within the meaning of Article 22 of the UK GDPR. Your health information is not used to train our AI systems.

Each is described in detail below.

3.1 AI Referral Triage

Overview

When a client organisation refers an employee for occupational health services, they submit information describing the employee's condition or reason for referral within PAM Group's referral system. PAM Group uses AI to review this information and select the most appropriate type of appointment — for example, a musculoskeletal or a mental health assessment.

The AI processes the referral content as submitted by the client. It does not access the employee's medical history or any data beyond the referral submission itself. It does not contact the employee or communicate any outcome to any party.

Human oversight of AI triage decisions operates at two levels. First, the clinician who is assigned the appointment reviews the triage outcome when preparing for the appointment and can identify and escalate any inappropriate allocation before the appointment is

delivered. Second, PAM Group conducts audits of triage outputs to monitor accuracy and consistency over time, with the authority to intervene and correct any systematic issues identified.

What data is processed

The AI processes the referral content as submitted by the client. This typically includes a description of the employee's health concern or work situation. It does not process the employee's name, date of birth, or other identifiable data as part of generating the recommendation; those details are visible to the client services team member at the point of human review, as they have always been.

Automated processing is limited to identifying what service type is required and does not involve automated decision making within the meaning of Article 22 of the UK GDPR.

What the AI does and does not do

The AI reads the referral content and maps it to a recommended appointment service. It does not contact the employee, communicate any outcome to any party, access the employee's medical history, or make any clinical assessment. The appointment type the AI recommends carries no weight unless a qualified professional agrees with it prior to the appointment. A human intervention supersedes AI where required.

Safeguards

- The clinician reviewing the referral/case prior to delivering the appointment retains full authority to identify and escalate any triage decision they consider requires a different assessment/triage for a to enable a better outcome for the data subject.
- PAM conducts regular audits of AI triage outputs to ensure quality and accuracy of AI use.
- Referral data is processed within PAM Group's secure infrastructure and is not shared with external AI platforms.
- Your health information is not used to train our AI systems.

3.2 AI-Assisted Clinical Note taking

Overview

PAM Group uses AI-assisted software installed directly on clinician workstations to support clinical documentation during occupational health consultations. The software operates locally on the device and transcribes spoken conversation.

Once the consultation is complete, the AI-assisted software processes a transcript of the consultation and generates a structured summary, which is used to pre-populate a clinical documentation template. At this stage the clinician will review and have the ability to edit the summary to ensure the clinical notes reflect the appointment.

The sole purpose of the AI assisted software is to assist the clinician in structured and consistent note taking to enable the clinician to spend more time listening and engaging with the data subject during the appointment.

What data is processed

The AI listens to and transcribes the consultation, then summarises the content of what was discussed. It does not make recommendations, suggest diagnoses, propose treatment plans, or draw any conclusions about the individual's fitness for work or any other clinical matter. Its functionality is solely to assist the clinician in capturing what was said accurately and efficiently.

The clinician reviews the AI-assisted summary in full before it is submitted to PAM Group's bespoke clinical system. The clinician will make all amendments that are necessary and take full responsibility for the accuracy and completeness of the final record. AI-assisted outputs are never submitted to the clinical system without clinician review and approval.

Data is processed locally in real time and is not saved by the AI-assisted software.¹

Consent and transparency

Data subjects will be clearly informed by the clinician at the start of the appointment that AI-assisted software is in use and may choose whether or not to consent to its use.

If an individual does not wish for AI-assisted software to be used, the clinician will continue to conduct and document the consultation by other means, i.e. Manual note taking. Declining the use of AI-assisted software will have no effect on the standard of care provided. However, PAM Group recommend using AI-assisted software to allow for clinicians to have more time to listen and engage with each data subject.

Safeguards

- Processing takes place within a secure cloud-based environment under the data controllership of PAM Group.
- The clinician reviews, amends where necessary, and formally approves all AI-generated outputs before they are formally accepted into PAM Group's bespoke clinical system.
- AI is NOT a decision-maker. Every output is subject to mandatory human review.
- Clear audit trails are maintained for all AI-assisted software consultations.

¹ Please note that call recordings made via PAM's telephony may be separately retained by PAM as part of the telephony service, in accordance with the retention periods set out in the main Privacy Policy (HP017). This is a separate process from AI transcription and is not affected by the use of AI.

- Data sovereignty is maintained in line with PAM Group's existing commitments; UK consultation data is processed and held in the UK; Republic of Ireland consultation data is processed and held in Republic of Ireland.

4. Legal Basis for AI-Related Processing

AI Capability	Legal Basis	Notes
Referral Triage	UK GDPR Article 6(1)(b) – processing necessary for the performance of a contract; UK GDPR Article 9(2)(h) – processing necessary for occupational medicine and assessment of working capacity	Processing is necessary to route referrals as part of service delivery. Human intervention is carried out prior to appointments.
Clinical Transcription	UK GDPR Article 6(1)(a) – consent; UK GDPR Article 9(2)(a) – explicit consent for special category health data; Data Protection Act 2018, Schedule 1, Part 1, s.2 – health and social care purposes	Informed consent is obtained from the individual at the start of each consultation where AI-assisted software is used. Consent may be withdrawn at any time without detriment

5. Your Rights in Relation to AI Processing

In addition to the rights set out in Pam Group's Privacy Policy (HP017), the rights under UK GDPR will be followed however for further information in regard to AI-assisted software please see the below:

Right to be informed – You will be told when AI-assisted software is in use during your consultation or in the processing of your referral, in plain and clear language, before processing begins.

Right to dissent to the use of AI-assisted software– You may decline the use of AI-assisted software at any point before or during a consultation.

Right not to be subject to solely automated decision-making – PAM Group does not make decisions made by solely automated means. All AI-assisted software outputs are subject to human review before any action is taken, in accordance with Article 22 of the UK GDPR.

Right of access – You may request a copy of personal data held or processed by PAM Group, including data that has been processed through AI-assisted software, by contacting sar@pamgroup.co.uk.

Right to rectification – If you believe any record produced with the use of AI-assisted software is factually inaccurate, you have the right to request rectification under UK GDPR Article 16.

No AI output relating to you will be used, shared, or acted upon without review and approval by a professional member of PAM Group's clinical or administrative team.

6. Data Retention

The AI-generated transcript will be retained for the same period as the associated call recording, in line with PAM Group's data retention guidance.

7. Governance and Oversight

PAM Group's AI-assisted software capabilities operate within a governance framework that includes an AI Ethics Committee comprising senior representatives from technology, legal, compliance, and clinical functions, which meets quarterly.

All AI-assisted software developments are assessed through an Internal Review Protocol at each stage of the AI lifecycle. PAM Group's approach is aligned with ISO 42001 (AI Management Systems), the ICO's AI and Data Protection guidance, and the UK AI Safety Institute's governance guidelines.

Bias monitoring is conducted to ensure AI-assisted software outputs do not discriminate on the basis of any protected characteristic under the Equality Act 2010.