

Fair Processing & Privacy Notice

As a registered patient, Pelham Medical has a legal duty to explain how we use any personal information we collect about you at the organisation. We collect records about your health and the treatment you receive in both electronic and paper format.

Why do we have to provide this privacy notice?

We are required to provide you with this privacy notice by law. It provides information about how we use the personal and healthcare information we collect, store and hold about you. If you have any questions about this privacy notice or are unclear about how we process or use your personal information or have any other issue regarding your personal and healthcare information, then please contact our Data Protection Officer - Barry Jackson n3i.dpo@nhs.net.

The main things the law says we must tell you about what we do with your personal data are:

- We must let you know why we collect personal and healthcare information about you.
- We must let you know how we use any personal and/or healthcare information we hold about you.
- We need to inform you in respect of what we do with it.
- We need to tell you about who we share it with or pass it on to and why.
- We need to let you know how long we can keep it for.

The General Data Protection Regulation (GDPR) became law on 24 May 2016. This was a single EU-wide regulation on the protection of confidential and sensitive information. It entered into force in the UK on the 25 May 2018, repealing the Data Protection Act (1998). Following Brexit, the GDPR became incorporated into the Data Protection Act 2018 (DPA18) at Part 2, Chapter 2 titled The UK GDPR.

For the purpose of applicable data protection legislation (including but not limited to the Data Protection Act 2018 (DPA2018) and Part 2 the UK GDPR).

Who is the data controller?

This organisation is registered as a data controller under the Data Protection Act 2018. Our registration number is Z4767608, and our registration can be viewed online in the public register at www.ico.gov.uk. This means we are responsible for handling your personal and healthcare information and collecting and storing it appropriately when you are seen by us as a patient.

We may also process your information for a particular purpose and therefore we may also be data processors. The purposes for which we use your information are set out in this privacy notice.

What type of information do we collect about you?

Information held by this organisation may include the following:

- Your contact details (such as your name, address and email address)
- Details and contact numbers of your next of kin.
- Your age range, gender, ethnicity.

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- Details in relation to your medical history.
- The reason for your visit to the organisation.
- Any contact the organisation and/or your practice has had with you including appointments (emergency or scheduled), clinic visits, etc.
- Notes and reports about your health, details of diagnosis and consultations with our GPs and other health professionals within the healthcare environment involved in your direct healthcare.
- Details about the treatment and care received.
- Results of investigations such as laboratory tests, x-rays, etc.
- Relevant information from other health professionals, relatives or those who care for you.
- Recordings of telephone conversations between yourself and the organisation.

Who can we provide your personal information to and why?

We will share relevant information from your medical record with other health or social care staff or organisations when they provide you with care. For example, your GP will share information when they refer you to a specialist in a hospital or your GP will send details about your prescription to your chosen pharmacy.

Healthcare staff working in A&E and out of hours care will also have access to your information. For example, it is important that staff who are treating you in an emergency know if you have any allergic reactions. This will involve the use of your Summary Care Record For more information see NHS [Summary Care Record](#) or alternatively speak to this organisation.

We may pass your personal information on to the following people or organisations because these organisations may require your information to assist them in the provision of your direct healthcare needs. It therefore may be important for them to be able to access your information in order to ensure they may deliver their services to you (list not exhaustive):

- Hospital professionals (such as doctors, consultants, nurses etc.)
- Other GPs/doctors
- Primary Care Networks
- NHS Trusts/Foundation Trusts/Specialist Trusts
- NHS England (NHSE)
- Multi-agency Safeguarding Hub (MASH)
- Independent contractors such as dentists, opticians, pharmacists
- Any other person who is involved in providing services related to your general healthcare including mental health professionals
- Private sector providers including pharmaceutical companies to allow for the provision of medical equipment, dressings, hosiery etc.

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- Voluntary sector providers
- Ambulance Trusts
- Social care services
- Education services
- Other 'data processors', e.g., Diabetes UK

Your information will only be shared if it is appropriate for the provision of your care or required to satisfy our statutory function and legal obligations. In some cases, you will be asked for explicit consent. You have the right to object to information being shared for your own care. Please speak to this organisation if you wish to object. You also have the right to have any mistakes or errors corrected.

Registering for NHS care

All patients who receive NHS care are registered on a national database (NHS Spine). The Spine is held and maintained by NHS England, a national organisation which has legal responsibilities to collect NHS data. More information can be found at [NHS England - Spine](#)

Where do we store your information electronically?

Maintaining your confidentiality and accessing your records

We are committed to protecting your privacy and will only use information collected lawfully in accordance with the UK General Data Protection Regulations (which is overseen by the Information Commissioner's Office). Every staff member who works for an NHS organisation has a legal obligation to maintain the confidentiality of patient information.

Patient communication

As we are obliged to protect any confidential information we hold about you, it is imperative that you let us know immediately if you change any of your contact details.

We may contact you using SMS texting to your mobile phone should we need to notify you about appointments and other services that we provide to you involving your direct care. This is to ensure we are sure we are contacting you and not another person. As this is operated on an 'opt-out' basis we will assume that you have given us permission to contact you via SMS if you have provided your mobile telephone number. Please let the organisation know if you wish to opt-out of this SMS service. We may also contact you using the email address you have provided to us.

Sharing your information without consent

Sometimes we need to share information so that other people, including healthcare staff, children or others with safeguarding needs, are protected from risk of harm. These circumstances are rare, and we do not need your consent or agreement to do this.

There are times when we may be required by law to share your information without your consent, for example:

- Where there is a serious risk of harm or abuse to you or other people

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- Where a serious crime, such as assault, is being investigated or where it could be prevented
- Notification of new births
- Where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS)
- Where a formal court order has been issued

Third party processors

We will use carefully selected third party service providers. When we use a third-party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties include:

Companies that provide IT services and support, including our core clinical systems, systems that manage patient facing services (such as our website and service accessible through the same), data hosting service providers, systems that facilitate appointment bookings or electronic prescription services, systems that help us monitor activity and manage capacity, and document management services etc.

Data is processed and managed via the electronic patient record system, EMIS Web. EMIS securely hosts patient medical data in the UK through Amazon Web Services (AWS) datacentres located in the UK.

Data will be fully encrypted both in transit and at rest. In doing this, there will be no change to the control of access to your data, and the hosted service provider will not have any access to the decryption keys. AWS is one of the world's largest cloud companies, already supporting numerous public sector clients (including the NHS), and it offers the highest levels of security and support.

Further details regarding specific third-party processors can be supplied on request to the data protection officer as below.

Artificial Intelligence (AI)

Prior to using AI, a full data protection impact assessment has been compiled, and any AI use will comply with the strict UK data protection laws that also includes UK GDPR.

The practice may use AI software and tools in triaging initial enquiries or during consultations to support both the compiling and documenting of a patient's clinical record. There are two main types of personal data that will be processed during a consultation, including the patient's name, contact details, medical history, diagnosis, treatment information, and any other information shared. Should you not wish us to use any AI during, please make us aware of this.

For further information, full details are provided as an addendum to this notice.

Third parties mentioned on your medical record

Sometimes we record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them that may breach their rights to confidentiality are

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removed before we send any information to any other party including yourself. Third parties can include spouses, partners and other family members.

Medical research

This organisation shares information from medical records to support medical research when the law allows us to do so, for example to learn more about why people get ill and what treatments might work best.

The use of information from GP medical records is very useful in developing new treatments and medicines; medical researchers use information from these records to help to answer important questions about illnesses and disease so that improvements can be made to the care and treatment patients receive.

You have the right to object to your identifiable information being used or shared for medical research purposes. Please speak to the organisation if you wish to object.

Audit

Auditing of clinical notes is done by this organisation as part of its commitment to the effective management of healthcare whilst acting as a data processor.

Article 9.2.h is applicable to the management of healthcare services and *“permits processing necessary for the purposes of medical diagnosis, provision of healthcare and treatment, provision of social care and the management of healthcare systems or services or social care systems or services.”* No consent is required to audit clinical notes for this purpose.

Risk Stratification: Identifying Patients Who Might Be At Risk of Certain Diseases

This is a form of audit. Your medical records will be searched by a computer programme so that we can identify patients who might be at high risk from certain diseases such as heart disease or unplanned admissions to hospital. This means we can offer patients additional care or support as early as possible.

This process will involve linking information from your GP record with information from other health or social care services you have used. Information which identifies you will only be seen by this organisation.

Medicines Management

The Practice may conduct Medicines Management Reviews of items prescribed to its patients. This service performs a review of medications to ensure patients receive the most appropriate, up to date and cost-effective treatments. The practice may make arrangements with independent organisations for this purpose. These companies are bound by contractual agreements to ensure information is kept confidential and secure.

GP connect service

We use a facility called GP Connect to support your direct care. GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct

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patient care, leading to improvements in both care and outcomes. GP Connect is not used for any purpose other than direct care.

Authorised clinicians such as GPs, NHS 111 clinicians, care home nurses (if you are in a care home), secondary care trusts and social care clinicians are able to access the GP records of the patients they are treating via GP connect.

Invoice validation

Your information may be shared if you have received treatment to determine which ICB is responsible for paying for your treatment. This information may include your name, address and treatment date. All of this information is held securely and confidentially; it will not be used for any other purpose or shared with any third parties.

NHS health checks

Cohorts of our patients aged 40-74 not previously diagnosed with cardiovascular disease are eligible to be invited for an NHS Health Check. Nobody outside the healthcare team at this organisation will see confidential information about you during the invitation process.

Primary care networks

The objective of primary care networks (PCNs) is for group practices together to create more collaborative workforces that ease the pressure of GPs, leaving them better able to focus on patient care. All areas within England are covered by a PCN.

Primary Care Networks form a key building block of the NHS long-term plan. Bringing general practices together to work at scale has been a policy priority for some years for a range of reasons including improving the ability of practices to recruit and retain staff, to manage financial and estates pressures, to provide a wider range of services to patients and to integrate with the wider health and care system more easily.

This means that this organisation may share your information with other practices within the Primary Care Network to provide you with your care and treatment.

Shared care

To support your care and improve the sharing of relevant information to our partner organisations when they are involved in looking after you, we will share information to other systems.

You can opt-out of this sharing of your records with our partners at any time if this sharing is based on your consent.

Telephone system & CCTV

Our telephone system records all telephone calls. Recordings may be retained for up to one year and are used periodically for the purposes of seeking clarification where there is a dispute as to what was said and for staff training. Access to these recordings is restricted to practice staff and only accessed when there is a justified need e.g., managing complaints, training, provision of care, or service improvement.

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CCTV is held for the purposes of security and monitoring and will be held for three months. The practice will not provide CCTV images to individuals relating to traffic incidents in the car park. Where an accident has involved injury or significant damage then the Police must be informed. The Police have a clear legal basis to access the images to investigate the incident.

Schedule 2 Part 1(5) of the Data Protection Act 2018 allows the Practice to disclose personal information where it is required for legal proceedings. Applications for disclosure of information relating to civil cases are considered on a case-by-case basis. Such cases may for example relate to recovering the costs for damage.

What the Act says

Schedule 2 Part 1(5) disclosures required by law or made in connection with legal proceedings etc.

(1) The listed GDPR provisions do not apply to personal data consisting of information that the controller is obliged by an enactment to make available to the public, to the extent that the application of those provisions would prevent the controller from complying with that obligation.

(2) The listed GDPR provisions do not apply to personal data where disclosure of the data required by an enactment, a rule of law or an order of a court or tribunal, to the extent that the application of those provisions would prevent the controller from making the disclosure.

(3) The listed GDPR provisions do not apply to personal data where disclosure of the data -

(a) is necessary for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings)

(b) is necessary for the purpose of obtaining legal advice; or

(c) is otherwise necessary for the purposes of establishing, exercising or defending legal rights,

to the extent that the application of those provisions would prevent the controller from making the disclosure.

Requests made under Schedule 2 Part 1(5) which do not fall into one of these categories will not be accepted.

Fees - There will be a fee of £200 for providing copies of CCTV images.

How to apply - To make it easier for persons requesting information under Schedule 2 Part 1(5) of the Act, the Practice has created a form which has to be completed before a request will be considered. The Schedule 2 Part 1(5) Data Protection Act 2018 Application Form can be requested via email to the following addresses – enquiries.pelham@nhs.net

Organisation website

Our website does use cookies to optimise your experience. Using this feature means that you have agreed to the use of cookies as required by the EU Data Protection Directive 95/46/EC. You have the option to decline the use of cookies on your first visit to the website. The only website this privacy notice applies to is this organisation's website. If you use a link to any other website from the organisation's website then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

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Opt-outs - National opt-out facility

This is used by the NHS, local authorities, university and hospital researchers, medical colleges and pharmaceutical companies researching new treatments.

You can choose to opt-out of sharing your confidential patient information for research and planning. There may still be times when your confidential patient information is used; for example, during an epidemic where there might be a risk to you or to other people's health. You can also still consent to take part in a specific research project.

[NHS England](#) explains that the national data opt-out allows patients to choose if they do not want their confidential patient information to be used for purposes beyond their individual care and treatment. NHS England provide [detailed guidance](#) for opt-outs, including those patients in secure settings. Additional information is also available for patients at [Make a choice about sharing data from your health records](#).

Your confidential patient information will still be used for your individual care. Choosing to opt-out will not affect your care and treatment. You will still be invited for screening services such as screening for bowel cancer.

You do not need to do anything if you are happy about how your confidential patient information is used.

How NHS England uses patient data

NHS England will analyse and link the patient data we collect with other patient data we hold to create national data sets and for data quality purposes. NHSE will be able to use the de-identification software to convert the unique codes back to data that could directly identify patients in certain circumstances for these purposes, where this is necessary and where there is a valid legal reason. There are strict internal approvals which need to be in place before NHSE can do this and this will be subject to independent scrutiny and oversight by the [Independent Group Advising on the Release of Data \(IGARD\)](#).

These national data sets are analysed and used by NHS England to produce national statistics and management information including public dashboards about health and social care which are published. NHSE never publishes any patient data that could identify any individual. All data they publish is anonymous statistical data.

For more information about data NHSE publishes see [Data and Information](#) and [Data Dashboards](#).

What to do if you have any questions

Should you have any questions about our privacy policy or the information we hold about you, you can:

1. GP practices are data controllers for the data they hold about their patients. Contact the organisation via email at enquiries.pelham@nhs.net
2. Write to the Data Protection Officer (DPO) – Barry Jackson N3i.DPO@NHS.NET or for urgent matters phone 0300 002 0001.

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We are required by law to provide you with the following information about how we handle your information:

Data Controller	Pelham Medical Group enquiries.pelham@nhs.net
Data Protection Officer	Barry Jackson: N3i.DPO@NHS.NET
Purpose of the processing	To give direct health or social care to individual patients. An example is, when a patient agrees to a referral for direct care, such as to a hospital, relevant information about the patient will be shared with the other healthcare staff to enable them to give appropriate advice, investigations, treatments and/or care. To check and review the quality of care. (This is called audit and clinical governance). Medical research and to check the quality of care which is given to patients (this is called national clinical audit).
Lawful basis for processing	These purposes are supported under the following sections of the GDPR: Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...’ The following sections of the GDPR mean that we can use medical records for research and to check the quality of care (national clinical audits): Article 6(1)(e) – ‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller’. For medical research: there are two possible Article 9 conditions. [select the appropriate condition] Article 9(2)(a) – ‘the data subject has given explicit consent...’ OR Article 9(2)(j) – ‘processing is necessary for... scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member States law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject’. Healthcare staff will also respect and comply with their obligations under the common law duty of confidence.

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Recipient or categories of recipients of the processed data	The data will be shared with: • healthcare professionals and staff in this surgery; • out of hours services; • diagnostic and treatment centres; • hospital providers including (but not limited to) Humber Health Partnership (Hull University Teaching Hospitals and Northern Lincolnshire and Goole Foundation Trust). • or other organisations involved in the provision of direct care to individual patients. For national clinical audits which check the quality of care the data will be shared with NHS England. Interface Clinical Services – an organisation who has supported with medicine management and optimising prescribing. The medical record is processed and stored by EMIS Web. EMIS also provides a web based platform (Apex) which is used to help analyse data for population health, data quality, care provision, risk stratification and managing capacity and demand. INR Star – a software platform used to deliver and safely manage patients who take warfarin. AAGlobal – Translation service provider. Online communication, appointment booking, data gathering directly related to the provision of care – Accurx and Anima. Call recording and CCTV.
Rights to object and the national data opt-out	You have the right to object to information being shared between those who are providing you with direct care. This may affect the care you receive – please speak to the practice. You are not able to object to your name, address and other demographic information being sent to NHS England. This is necessary if you wish to be registered to receive NHS care. You are not able to object when information is legitimately shared for safeguarding reasons. In appropriate circumstances it is a legal and professional requirement to share information for safeguarding reasons. This is to protect people from harm. The information will be shared with the local safeguarding service at North East Lincolnshire Council. The national data opt-out model provides an easy way for you to opt-out of information that identifies you being used or shared for medical research purposes and quality checking or audit purposes. Please contact the practice if you wish to opt-out. Further information is available from NHS England.

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Right to access and correct	You have the right to access your medical record and have any errors or mistakes corrected. Please speak to a member of staff or look at our Access to Medical Records Policy. We are not aware of any circumstances in which you will have the right to delete correct information from your medical record; although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the information and contact us if you hold a different view.
Retention period	Records will be kept in line with the law and national guidance. Information on how long records are kept can be found in the Records Management Code of Practice.
Right to complain	In the unlikely event that you are unhappy with any element of our data-processing methods, do please contact the Practice Manager in the first instance. If you feel that we have not addressed your concern appropriately, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). Further details, visit https://ico.org.uk/for-the-public/ and select "Make a complaint" or telephone: 0303 123 1113.
Data we get from other organisations	We receive information about your health from other organisations who are involved in providing you with health and social care. For example, if you go to hospital for treatment or an operation the hospital will send us a letter to let us know what happens. This means your GP medical record is kept up-to date when you receive care from other parts of the health service.

Privacy Statement Addendum: Online Triage & Consultations via Anima

What we do and why

To manage appointment requests safely and fairly, our practice uses an NHS-approved digital platform called Anima. When you submit a request online via our website, or when our reception team takes information over the phone and inputs a request on your behalf, Anima asks a series of multiple-choice questions. These are similar to the questions a doctor or nurse would ask during a consultation.

Anima uses advanced algorithms and artificial intelligence modules (Annie AI) to securely categorise your answers, assess clinical urgency (using a traffic-light RAG rating system), and generate concise clinical summaries. This allows our team to address critical cases rapidly, eliminate the "8 am phone rush," and direct your request to the right healthcare professional (e.g., a GP, nurse, pharmacist, or physiotherapist). The system compliments and enhances the safety of our existing processes.

How Andi AI (voice agent) processes your phone calls

If you choose to use our automated telephone care navigator, Andi, the system will speak with you in natural language to gather details about your medical or administrative request.

- **Transcription and Structuring:** Andi securely records your spoken answers, translates them into text, and structures them into a clear medical summary.
- **Dashboard Delivery:** This structured summary is pushed instantly into our central clinical dashboard, the exact same workspace used for requests submitted by patients online (as noted in the section above).
- **Emergency Detection:** Andi is trained to recognise red-flag words indicating a medical emergency. If an emergency is detected, Andi will stop the call immediately and instruct you to hang up and call 999 or attend A&E.

You are not required to use the automated system.

- **Online Forms:** You can complete the Anima questionnaire online yourself if you prefer not to use the phone.
- **Speaking to a Human:** If you prefer to speak to a traditional receptionist, you can ask Andi to transfer you or select the option to remain in the queue for our front-of-house team at any point. Our staff remain fully available and will manually type your request into the system.

How your data is handled

- **Information collected:** We process personal identifiers (name, date of birth, contact details) alongside "special category data" (details of your symptoms, medical history, and any photos you choose to upload).
- **Data Integration:** Anima has native, deep integration with our primary medical record software (EMIS). It securely retrieves basic records to contextualise your request and saves the completed care plan or summary directly back into your permanent medical file with a single click.

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- **Human Oversight & Safety:** Anima is a decision-support tool, not an AI doctor. It does not diagnose you or automatically decide your treatment. Every automated summary, priority score, and routing suggestion is reviewed, verified, and signed off by a human clinician or care navigator before any action is taken.
- **Data Security Standards:** Anima complies with strict NHS Information Governance frameworks. The platform is fully aligned with the NHS Digital Technology Assessment Criteria (DTAC), holds IM1 assurance for secure EHR data exchange, and is fully compliant with the UK GDPR and Data Protection Act 2018. Data is encrypted both while moving and at rest within secure UK-hosted data centres.

Your choices and rights

Using Anima is highly recommended as it ensures your request is safely triaged based on medical need, rather than who can get through on the phone first. However, if you are unable to use the online system or object to automated parsing, you can call our reception team. They will ask you the same questions and manually log your request into the clinical dashboard.

Governance of AI

Before their use is approved, AI tools are subject to enhanced Data Protection Impact Assessments for the specific use case requested. These are considered by the Information Governance Lead and Data Protection Officer to decide if they are fit for use.

At this organisation, we see AI as a tool to support our work. Ownership and accountability will always remain with our staff members who use and double check the product generated by AI, e.g., the accuracy of a clinical note.

Lawful basis

The lawful basis to process your personal data does not change because we use Artificial Intelligence (AI). This notice is in addition to our Practice Privacy Notice which can be viewed on our website.