

Gatwick Medical Services – Data Privacy Policy

1. Introduction

1.1. Dr Justin Flatt t/a Gatwick Medical Services, carries out aviation medicals and other occupational health medicals primarily for pilots and cabin crew.

1.2. When you register as a client with Gatwick Medical Services, such as by booking an appointment online, we gain a legitimate interest in storing and using your information in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

1.3. Under GDPR, health information has a higher degree of protection than general personal data. We hold your health information with your explicit consent, and for regulatory purposes only.

1.4. If we carry out an aviation medical for you and your medical records are held by the UK Civil Aviation Authority (CAA), the CAA is the Data Controller for your personal information, and we act as Data Processors.

1.5. If we carry out an aviation medical for you and your medical records are held by the US Federal Aviation Administration (FAA), the FAA is the Data Controller for your personal information, and we act as Data Processors.

1.6. For all other services, Dr Justin Flatt can be considered as the Data Controller and is registered with the Information Commissioners Office (ICO) as such.

2. What personal information do we hold/not hold about you?

2.1. Any details entered in your online appointment booking, such as name, address, telephone number, email address, CAA reference number, any notes you have added and the type of appointment you have requested.

2.2. Your photo identification is checked at your medical, but a copy is not made.

2.3. Results of all medical tests and examinations carried out by us are uploaded to the CAA (Cellma) or FAA (AMCS) Medical Records Systems at the time of the medical and then destroyed or deleted.

2.4. All medical reports, investigation results and blood tests provided directly or indirectly by you are uploaded to the CAA or FAA Medical Records Systems without delay and then deleted or destroyed.

2.5. Your previous medical certificate, surrendered upon issue of a new certificate, is destroyed immediately.

3. How do we store your personal information?

3.1. Cabin Crew Medical and other Occupational Health records are held securely in a locked filing cabinet and are gradually being scanned to the secure Microsoft OneDrive cloud-based server, after which, the hard copies will be destroyed.

3.2. All medical records from medicals performed prior to the CAA introducing Cellma are held securely in a locked filing cabinet and are gradually being scanned

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to the secure Microsoft OneDrive cloud-based server, after which, the hard copies will be destroyed.

3.3. Hardcopies of your Medical Records are no longer held in line with CAA and FAA Medical Records Systems procedures, except for 3.1 and 3.2.

3.4. Electronic copies of information referred to in 3.1 and 3.2, are stored on the GDPR-compliant, secure Microsoft OneDrive cloud-based server, accessed by password protected computer.

3.5. For CAA and FAA medicals, an electronic copy of your information is stored on the medical records database at the CAA (Cellma) or FAA (AMCS).

4. How we use/share your personal information?

4.1. Your personal information is used for the sole purpose of determining your medical status, issuing medical certificates and maintaining a full and complete medical history as required by the relevant regulating bodies - CAA and FAA. We will also use it to contact you on matters pertaining to your medical certification.

4.2. All employees of Gatwick Medical Services that require access to your personal information are bound by a duty of confidentiality and have signed confidentiality agreements.

4.3. For aviation medical clients we will also share your information with the CAA or FAA to be used solely for regulatory purposes.

4.4. Where it is necessary to send your electrocardiogram (ECG) for cardiology over-read, this will be managed securely within the CAA Cellma system.

4.5. Your personal information will not be shared with any other person or official body without your express permission, unless we are required to do so by law.

4.6. Sensitive personal and medical information is not transmitted by email.

5. How long do we hold your personal information?

5.1. For all services we will normally retain your personal information at least until such time as you advise us that you no longer wish to be registered with our practice.

5.2. For aviation medical clients, we are required by the CAA to hold your medical records until such time as we cease providing aeromedical services due to retirement or closure of the practice.

5.3. When we cease providing aeromedical services, all hardcopy and electronic records relating to the CAA will be returned to the CAA, as required under its terms and conditions for AMEs, and all other records will be destroyed or deleted.

6. What right of access and control do you have over your personal information?

6.1. At any time, you can request a copy of your personal information that we store.

6.2. If any of the stored information is factually incorrect or incomplete, you can ask us to remove it or correct it.

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6.3. You can request that all personal information we hold about you is erased from our records. In this event we would transfer any data related to your medical certification to the CAA (or FAA) and you would be removed from our practice list, as we would no longer be able to carry out our duties as your medical examiner. We would erase or transfer, as appropriate, the data held in your medical files, but we would retain records of our financial transactions with you, and a record that you had been a previous client.

6.4. We are obliged to confirm your identity before providing, amending or deleting any of your personal information at your request. This is done in person with either a current passport or UK photo driving licence.