

## Cellma – Data Protection

Since the launch of CELLMA back in March, we have received some valuable and constructive feedback and questions, particularly around access to the system. We are committed to providing high standard of service to everyone we deal with and it is for this reason that we welcome this feedback

As I'm sure you will appreciate, all medical records systems have to strike a balance between availability for legitimate use whilst protecting the information within it. It was also an important aspect to us that AMEs and individuals had more control over the process. With the increasing number of group practices and cross-cover between AMEs, it is now very common for applicants to be transferred between individual Aeromedical Examiner practices.

Although there is no 'one size fits' all solution to protecting information, it was important that the CAA consulted the General Medical Council (GMC) and the Information Commissioner's Office (ICO) guidance which has been followed throughout the pre-launch project. In short, we wish to provide some reassurance that while the system has always met as necessary requirements, with help from stakeholders, including AMEs, we've taken steps to identify, assess and understand how the system could be further enhanced, such as additional technical measures that are currently being put in place to ensure that oversight is strengthened. Of course, these additional measures continue to be fully compliant with the ICO and GMC guidance

There are a number of principal protections that have always been, and continue to be, in use, such as access controls, specific user privileges, audit trails and internal and external codes of practice. The system is capable of producing routine system reports that are used to detect unusual patterns of access to records. Furthermore, audits and regular testing is conducted. As you would expect, the CAA has strict internal policies and procedures when rare incidents require escalating to the ICO and/or GMC.

To serve as a reminder, applicants can only access their own records and can see every user, such as their AMEs, that have had an interaction with their record. This is a great step forward from the previous system and allows individuals more control over their personal data. We encourage people to contact their AME in the first instance if they do not recognise the name of an individual that has accessed their record

All necessary Notices relating to Data Protection, security and privacy are available on the CAA's website and at each stage of the on-line process to ensure users are properly informed about the CAA's use of personal data. [General privacy notice | UK Civil Aviation Authority \(caa.co.uk\)](#)

Please feel free to continue to provide feedback to us as the system really beds in. There will always be teething problems with such big changes but will ultimately bring about positive steps forward in our regulatory oversight.

Chris Whitehurst

Data Protection Manager