

Division:	Relationships & Advocacy	Ref. No.	REL-RMT-001
Department:	Relationships Management		
Title:	Privacy of Personal Information		

1. PURPOSE AND SCOPE

The specific legal obligations of entities when collecting and handling personal information are outlined in the *Privacy Act 1988 (Cth)* and the *Privacy Act 1993 (NZ)* and the Australian Privacy Principles and the Information Privacy Principles respectively. One of such obligations requires entities to have a privacy policy.

This policy outlines the personal information handling practices of the Royal Australasian College of Surgeons (RACS).

2. KEYWORDS

Privacy, personal information, collection, disclosure, correction, complaints, storage, security, access

3. BODY OF POLICY

RACS may collect, hold, use and disclose personal information about Fellows, Trainees, International Medical Graduates (IMGs), applicants for registration, suppliers, conference delegates, staff and other individuals to effectively carry out its principal roles as a provider of surgical training, a Fellowship organisation and an employer.

This information includes name, address, phone number, and email address, and may also include other personal information and financial information.

RACS employees should refer to the Human Resources Record Keeping Policy as to the management of their personal information.

RACS will ensure a designated employee is appropriately trained in privacy legislation and will act as the RACS Privacy Officer in order to be the primary RACS source of information regarding privacy matters.

3.1. Collection

3.1.1. RACS will at all times try to only collect the information needed for a particular function or activity. Collection may be via forms, documentation and online forums. The information collected will depend on the individual's relationship with RACS. RACS will use personal information in order to carry out its functions and activities. Functions and activities of RACS include:

- providing membership services and benefits and maintain membership and service/benefits records
- assisting and supporting Fellows, including providing and improving continuing professional development
- assisting and supporting surgical trainees
- providing surgical education and training
- providing assessment processes for IMGs
- providing workplaces and surgical practice environments which are free from discrimination, bullying and sexual harassment
- operating a complaints resolution process
- investigating conduct of staff, Fellows, trainees and IMGs
- workforce planning and policy development

Approved By: Director, Relationships & Advocacy

Document Owner: Privacy Officer

Original Issue: November 2011

Version: 3

Approval Date: November 2016

Review Date: November 2019

Division:	Relationships & Advocacy	Ref. No.	REL-RMT-001
Department:	Relationships Management		
Title:	Privacy of Personal Information		

- implementing, monitoring and maintaining quality assurance processes and systems, as well as processes and systems concerning regulatory matters, registrations, accreditation, audits, risk and claims management (including dealings with insurers)
- procuring funding, donations or other support for the activities of RACS
- recruiting suitable applicants to vacancies within RACS
- internal administration, training, assessments and reviews
- operating boards, committees, sections and other RACS bodies
- conduct of surgical mortality audits.

3.1.2. Web information collection

Without limiting the means by which information is collected by RACS, the usage analysis software used by RACS in connection with RACS website records (amongst other things) –

- unique visitors and sessions
- requested pages, downloads, search terms used, posted forms, status and errors, hits and bytes downloaded per directory, file, and file type
- entrance pages, exit pages, click paths, click to and click from and length of session
- domains, countries, and IP addresses and
- browsers, platforms, and robots.

The statistics are de-identified at the time of recording. This information is used for administrative purposes, including to improve and assess services, and to monitor usage patterns in order to improve navigation and design features - helping users to get information more easily.

RACS website will also use cookies to manage login and logout.

3.2. Disclosure

3.2.1. In general, RACS may disclose personal information to the following persons and organisations:

- Hospitals, health services and other employers of Fellows, Trainees and IMGs in connection with surgical training, IMG assessment, complaints handling and mandatory RACS course completion
- Surgical specialty societies and associations
- Providers of goods and services to RACS
- Government departments and agencies

Staff approached for the release of personal information should seek direction from the Director of the area that “owns” the requested information and refer to the Disclosure of Personal Information procedure.

3.2.2. Enquiries by the public regarding a Fellow, Trainee or IMG

Apart from confirming status and specialty of a Fellow, Trainee or IMG, no personal information will be disclosed to a member of the public without written consent except as required by law. Members of the public include spouses, family members, and colleagues.

Division:	Relationships & Advocacy	Ref. No.	REL-RMT-001
Department:	Relationships Management		
Title:	Privacy of Personal Information		

3.2.3. Workforce data

RACS publishes reports and information on its selection, training and accreditation activities and International Medical Graduates' assessment as well as general information on surgical workforce on RACS website and requestors should be referred to them.

The primary source for workforce and training information is RACS's Activities Report. Most requests can be handled by reference to this report. In the ordinary course, ad hoc reports on College activities and data will not be provided without approval of the Chief Executive Officer.

3.2.4. Direct marketing

RACS will not accept requests to market products or to advertise training courses directly to Fellows and Trainees and will therefore not disclose contact information to organisations requesting its use for these purposes. The Director of Relationships & Advocacy may choose to include information on the event in RACS routine newsletters.

3.3. Access

An individual may contact the Privacy Officer to access their personal information held by RACS. They will be required to provide their request in writing. The request will be addressed in accordance with privacy legislation. As is permitted by law, a fee may be charged to cover the cost of access.

RACS staff should contact the Human Resources Manager regarding access to their personal information.

3.4. Correction

RACS seeks to maintain the accuracy of personal information. Individuals are encouraged to contact RACS if the information held is incorrect or to notify RACS if personal information has changed. Changes to personal details can also be made on RACS website www.surgeons.org by the individual via personal login access where available.

3.5. Storage and Security

RACS stores personal information securely either electronically or in hard copy.

IT protection systems and internal procedures are utilised to protect the personal information held by RACS. This includes the website where RACS endeavours to ensure the website is secure through the use of firewalls.

RACS may store electronic information on remote servers or in the cloud directly, or through contracted agencies in Australia and New Zealand, as permitted by privacy legislation.

Personal information is only to be accessed internally by those RACS employees who require access as part of their role or to complete a task.

-payment security on RACS's site is achieved through encryption and system design. Additionally, the e-payment system does not store customers' credit card details on a server or database. These payments are processed in the United States.

Division:	Relationships & Advocacy	Ref. No.	REL-RMT-001
Department:	Relationships Management		
Title:	Privacy of Personal Information		

3.6. Complaints

Any inquiries or complaints about RACS's handling of personal information should be directed to the Privacy Officer on +61 3 9249 1200 or at college.privacy@surgeons.org. Complaints may be required in writing and resolved as promptly as possible.

The websites of the Office of the Australian Information Commissioner and the Office of the New Zealand Privacy Commissioner are an additional source of information – www.oaic.gov.au and www.privacy.org.nz.

4. ASSOCIATED DOCUMENTS

www.oaic.gov.au and www.privacy.org.nz.

Australian Privacy Principles set out in the *Privacy Act 1988 (Cth)*

Privacy Principles contained in the *Privacy Act 1993 (NZ)*

Disclosure of Personal Information Procedure

Data Breach Incidence Response Procedure

Human Resources Record Keeping Policy

Approver Governance & Advocacy Committee
Authoriser Council

Approved By: Director, Relationships & Advocacy
 Document Owner: Privacy Officer

Original Issue: November 2011
 Version: 3
 Approval Date: November 2016
 Review Date: November 2019