



**RANZCO**

The Royal Australian  
and New Zealand  
College of Ophthalmologists

## Privacy Policy

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**Approved by:** Board

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## 1. Purpose and scope

To carry out its objects and functions, RANZCO routinely collects personal information about individuals who use, access, provide or participate in RANZCO's services, events and activities.

This Policy details RANZCO's approach to the collection, use, access, disclosure and storage of personal information, particularly in relation to members. It is the primary document regarding the management of personal information by RANZCO. Any additional notices/statements issued are to be read in conjunction with this Privacy Policy.

RANZCO is committed to ensuring the privacy of individuals, in accordance with the *Privacy Act 1988* (Cth) (Australia) and *Privacy Act 1993* (New Zealand).

## 2. What personal information do we collect?

RANZCO may collect personal information about members, trainees, prospective members and trainees, International Medical Graduates, applicants for registration, donors, suppliers, conference delegates, staff, prospective employees and other individuals who interact with RANZCO, such as by using RANZCO's services or visiting RANZCO's website.

This information may include (but is not limited to) a person's name, address, phone number, email address, date of birth, bank account and credit card details, curriculum vitae, languages spoken, employment details/history, hospital affiliation, domestic/overseas medical registration details, educational qualifications, exam results, Continuing Professional Development (CPD) course attendance details, photograph, signature, travel preferences and requirements.

Sensitive information is dealt with slightly differently in legislation. It includes information or an opinion about an individual's attributes, such as health information, racial or ethnic origin, political opinions, membership of a political, professional or trade association, philosophical beliefs or affiliations, membership of a trade union, sexual preferences or practices, or criminal record.

Although RANZCO does not ordinarily seek to collect sensitive information for its business functions and activities, any such information RANZCO receives will not be used or disclosed without the individual's consent.

## 3. How is personal information collected?

Personal information will usually be collected from an individual directly in person, by telephone, in writing or via the internet. RANZCO may also collect personal information

from publicly available sources such as websites, social media, directories and databases.

RANZCO may occasionally need to collect personal information about an individual from third parties such as:

- persons involved in an individual's training or peer review, for example, referees, supervisors or peer reviewers;
- practice managers or employees;
- the College's consultants, auditors, lawyers, contractors and contracted staff or service providers that provide goods or administrative or other services in connection with the activities of RANZCO;
- entities and institutions who provide services or undertake activities in conjunction with or in association with RANZCO;
- regulatory authorities and bodies, professional or specialist societies and associations, hospitals and health centres and relevant complaints tribunals and government departments and agencies; and
- an individual's agent (with an individual's authority).

If RANZCO needs to collect personal information from a third party not mentioned in this Policy then RANZCO will first endeavour to obtain the individual's consent. If gaining consent is unreasonable or impracticable then the information will only be obtained from a third party if necessary for business functions and activities or required by law. RANZCO will, as soon as practicable afterwards, inform the individual about such third-party collection of personal information.

#### **4. How is personal information used?**

RANZCO collects personal information for a number of purposes (being the primary purposes of collection), including:

- to provide membership services and benefits and maintain membership and service/benefits records, including for RANZCO State/NZ Branches;
- to assist, support, provide and improve CPD and education, training and assessment;
- to enable planning, service development, policy, advocacy, and the preparation of reports;
- to market, advertise or otherwise promote RANZCO, including to inform individuals of special offers or additional services provided by RANZCO;

- to monitor, deal with, report and investigate potential misconduct;
- to appropriately interact with government and regulatory bodies relating to the profession;
- to implement, monitor and maintain 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);
- to procure funding, donations or other support for the activities of RANZCO;
- to enable internal administration, training, assessments and reviews;
- to provide or undertake any of the other activities referred to in this Policy; and
- to conduct or facilitate research or surveys for purposes related to RANZCO and/or one or more of the above activities.

Information may also be used or disclosed for a secondary purpose if required or authorised by law, or where an individual would reasonably expect RANZCO to use or disclose such information for that secondary purpose and it directly relates to the primary purpose of collection. For example, if an individual completes a form to register for RANZCO's Annual Scientific Congress, RANZCO may use the individual's contact details to issue a Congress Program.

## 5. How is personal information disclosed?

RANZCO may share personal information amongst its staff, Board, Council and Committees where appropriate to achieve its business functions and activities.

On occasion, RANZCO may disclose your personal information to certain third parties. If this happens, RANZCO will require the third party to protect your personal information to the same standards as RANZCO, usually through a confidentiality agreement

The types of third parties to whom personal information may be disclosed include:

- RANZCO's consultants, auditors, lawyers, contractors and service providers that provide goods or administrative or other services in connection with the activities of RANZCO;
- entities and institutions who provide services or undertake activities in conjunction with or in association with RANZCO;
- RANZCO State Branches to enable them to provide services on behalf of RANZCO

- regulatory authorities and bodies, professional or specialist societies and associations, hospitals and health centres and relevant complaints tribunals and government departments and agencies;
- where RANZCO collects an individual's information from someone else, or another entity, to that person or entity;
- to law enforcement agencies or other entities where the law requires or permits RANZCO to do so
- an individual's agent (with an individual's authority); and
- to assist with mail-outs to members or trainees advising of a product, conference or specific event or matter that may be of interest to members and/or trainees, or inviting completion (by either email or hard copy) of a survey approved by RANZCO.

RANZCO may disclose your personal information to a third party if the information is already publicly available e.g. through the 'Find an Ophthalmologist' function on the RANZCO website.

### 5.1. Overseas disclosures

RANZCO may occasionally have reason to disclose your personal information to organisations in Australia, New Zealand, or any other country in which RANZCO's members (or prospective members) may be located or RANZCO international development activities are taking place. RANZCO will take such steps as are reasonable in the circumstances to ensure that the overseas recipient will abide by Australian or New Zealand privacy laws, as applicable, when dealing with the personal information.

## 6. College-specific scenarios

This section sets out additional provisions relating to special purposes for which RANZCO may collect, use or disclose your personal information.

### 6.1. Information regarding International Medical Graduates

RANZCO may need to contact external institutions and individuals to clarify and obtain additional information in relation to the assessment of International Medical Graduates (IMGs). These requests are covered by this Policy, other collection notice or consent forms provided, and otherwise through any consent form signed by the IMG prior to or during the assessment process.

RANZCO is involved in the assessment of IMGs' training, qualifications and experience, and the Medical Board of Australia, Medical Council of New Zealand

(MCNZ) and the Australian Medical Council (AMC) discloses applicants' personal information to RANZCO for this purpose.

RANZCO may need to clarify this information with external institutions or individuals, and gather additional information in order to complete the assessment. Information may also be sought from any area of RANZCO, such as State Branches and the New Zealand Branch, and from Fellows within a hospital department e.g. past supervisors. As part of the specialist assessment process, RANZCO's assessment / recommendation(s) will be provided to the AMC and/or the relevant Medical Board. RANZCO may also disclose personal information where required to do so by law.

More information is available in the following RANZCO Policies:

- *Privacy Policy International Medical Graduate Assessment – New Zealand*
- *Privacy Policy – Specialist Recognition Applications*

## 6.2. Public and other third party enquiries regarding a College member

### 6.2.1. Requests from the public and regulators about a member

RANZCO regularly receives queries from the public and regulators requesting confirmation of the status of a member, including Fellows and trainees.

In relation to Fellows, RANZCO is able to advise that a person has been awarded Fellowship of RANZCO and any contact details and area(s) of interest indicated by the Fellow through the 'Find an Ophthalmologist' website function. It is important that the recipient of this information is aware that it is a confirmation of the status of a Fellow and not an endorsement.

A member's CPD compliance status may be provided to regulators but will not be disclosed to the public (See 'CPD Program' below).

In relation to trainees, RANZCO is able to confirm that a trainee is registered as a trainee with RANZCO. RANZCO may also provide trainee details and information about trainee performance to the Trainee's employer, Medical Registration Board and/or Australian Medical Council and/or Medical Council of New Zealand. Other requests concerning trainees will be considered on their individual merit. Where practical and reasonable, the trainee will be kept informed of any proposed action taken by RANZCO.

Unless otherwise agreed, RANZCO will not publicly publish names of trainees who have successfully completed an examination or components of their training. Trainees will instead be identified by a candidate number.

### *6.2.2. Requests from a member about another member*

In relation to enquiries from a member about names, areas of interest and contact details of another member, RANZCO staff will use the Find an Ophthalmologist function on the RANZCO website to disclose such information. For Fellows whose details are not on 'Find an Ophthalmologist', RANZCO may elect to obtain the contact details of the requester and provide this to the member or Trainee, allowing them to contact the requester directly.

Disclosure of another member's personal information will only be made if requested in relation to an activity of the College. Where a member is provided with another member's details, that information must only be reasonably used for the purposes for which it was given.

RANZCO will generally not grant requests by members and trainees for the names and contact details of other members and trainees for the purpose of electioneering for College-run elections (e.g. committee, Board and Council elections), or other extraneous or commercial purposes (e.g. advertising to other members or distributing political communications etc.)

### *6.2.3. Other requests*

In response to third-party requests for information other than those mentioned above, RANZCO may pursue any one of the following three options:

- RANZCO may refuse to provide the information;
- RANZCO may elect to contact the member and advise them that information is being requested about them and seek their express consent to release it; or
- RANZCO may elect to obtain the contact details of the requester and provide this to the member or Trainee, allowing them to contact the requester directly.

## **6.3. Communication within RANZCO and with associated bodies regarding College members**

Requests for personal information from within RANZCO (e.g. RANZCO State Branches, RANZCO NZ Branch, Special Interest Groups etc) and from associated bodies (e.g. Australian Society of Ophthalmologists etc) usually relate to mail-outs to member regarding a conference or specific event or inviting completion of a survey approved by RANZCO. The College will generally deal with these types of requests by sending the relevant details on to members (or subset of members) on behalf of the requestor/associated body.

#### 6.4. CPD Program

RANZCO may receive enquiries from hospitals, day surgery units, regulators and the general public regarding the participation of individual Fellows and other members in a RANZCO CPD Program. As Fellowship and registration with the Australian Health Practitioner Regulation Agency is contingent on CPD compliance, the enquiring individual may be advised of the member's Fellowship status and should be directed to check with AHPRA whether the Fellow is registered as a specialist. Any further details in relation to a Fellow's CPD activities may only be disclosed in response to specific requests from regulators, or another Medical College where a Fellow has advised they are dually a member of both that College and RANZCO.

#### 6.5. Receipt of unsolicited personal or sensitive information

Where RANZCO receives personal or sensitive information about an individual, which was not solicited, then that information will be dealt with in accordance with this Policy and the relevant legislation. For example, in circumstances where a patient's personal and/or sensitive information has incidentally been provided by a Fellow to the College as part of their CPD documentation or a policy query, the College must assess whether collection of the identified information is reasonably necessary for its business functions and if so, to notify the individual that the information has been collected and for what purposes. It should otherwise be destroyed or de-identified.

#### 6.6. RANZCO publications

RANZCO may disclose typical personal information to the media and through physical and digital applications and publications (including RANZCO's website, social media, emails and newsletters). For example this may occur in circumstances where a Fellow has provided comments that have been quoted in a publication or press release and the media seek further information.

#### 6.7. Medico-legal expert witness panels and requests for clinical reviews

RANZCO may respond to enquiries from members of the public, legal firms, health services, statutory bodies or similar requesting the name and contact details of a member in a particular region or area of practice who is registered on any RANZCO expert witness panel/register or otherwise considered appropriate to assist with a query or clinical practice/other review.

## 6.8. Providing information to the RANZCO Board, Council and/or Committees

Information about individual members (e.g. examination performance, work performance, survey responses) may be available to the Board, Council and Committees and supervisors of trainees, where such information is required for:

- review of an individual's performance in their work environment, in an examination, other assessment or in the CPD Program;
- other RANZCO functions and activities such as advocacy on health and workforce issues; and/or
- improving College processes/services.

Subject to this Policy and other College documents (e.g. Committee Terms of Reference), this information will be treated in confidence by College Boards, committees and supervisors and will not be made public in any way that will enable the identification of individual members or trainees.

## 6.9. Information requests regarding College Staff Members

Personal contact information of each College employees is retained in College files for use as required by the General Managers (GM) or Chief Executive Officer (CEO) (e.g. for business functions, in an emergency etc) in line with the principles stated in this Policy. Internal email addresses for staff members may be made available on the RANZCO website. Requests to access/update/correct information should be directed to the relevant GM or CEO.

## 6.10. RANZCO website

RANZCO's website and web-based services may collect an individual's:

- unique visits 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.

This information may be used for administrative purposes, including to improve and assess services by monitoring usage patterns. RANZCO also uses small text files placed on a user's computer called 'cookies' to collect standard log and visitor behaviour information in an anonymous form. This information is used to analyse how visitors use the RANZCO website and to compile statistical reports on website activity. Users can set their computer to reject cookies, but this may affect

the ability to use certain parts of the website. Except for the information that users specifically provide, RANZCO does not automatically collect any other information.

RANZCO's *'Privacy and Copyright Statement'* has additional information and is available on the website.

## 7. How is personal information stored?

RANZCO takes steps to protect all personal information it holds from loss, unauthorised access, modification, disclosure and misuse. These steps include physical barriers and restricted access to physical files and electronic equipment as well as password protection, encryption and periodic review of access audit logs of information RANZCO stores electronically. Staff must also comply with this Privacy Policy and any related policies covering the handling of personal information.

When no longer required for business or legal purposes, personal information is destroyed and/or de-identified in accordance with Government and industry best practices.

## 8. Accessing and correcting personal information

An individual may contact RANZCO at any time requesting access to their personal information. This request should be made in writing. Access will be provided unless the request is unreasonable or the applicable privacy laws permit or require RANZCO to decline that access. As permitted by law, a fee may be requested to cover the cost of access. RANZCO must provide a written notice for any refusal as per the applicable laws.

RANZCO seeks to maintain the accuracy of personal information. Individuals are encouraged to contact RANZCO if the information held is incorrect or to notify RANZCO if personal information has changed. Members can view and change some personal details through logging into the members-only page at [www.ranzco.edu](http://www.ranzco.edu). Changes that cannot be made through the College website should be directed to the appropriate person who routinely manages that data or [ranzco@ranzco.edu](mailto:ranzco@ranzco.edu).

## 9. Anonymity

An individual may elect not to identify, or to ask RANZCO not to use or disclose, his or her personal information in certain circumstances. For example, surveys should provide the option of remaining anonymous if appropriate. Members should recognize that electing to be anonymous may limit the services RANZCO can reasonably and practically provide.

## 10. Concerns and contacts

Any concerns about RANZCO's handling of personal information should be made in writing to [ranzco@ranzco.edu](mailto:ranzco@ranzco.edu).

Concerns will be resolved as promptly as possible by reference to this Policy and applicable laws. The person raising the concern will be notified of RANZCO's response to the concerns, including any remedial action RANZCO will take to resolve the concern, in writing.

## 11. References

- [www.oaic.gov.au](http://www.oaic.gov.au)
- [www.privacy.org.nz](http://www.privacy.org.nz)

## 12. Related documents

- Privacy and copyright statement (RANZCO website)
- Confidentiality Agreement
- Photo release form
- Privacy Policy International Medical Graduate Assessment – New Zealand
- Privacy Policy – Specialist Recognition Applications

## 13. Record of Amendments

Page	Details of amendment	Date approved
Entire document	Document replaces Privacy Policy (pages 10-23) in RANZCO Communications Policy dated 12/8/11	28/01/15