



RANZCO

The Royal Australian
and New Zealand
College of Ophthalmologists

RANZCO Data Access and Publication Policy

Approved by: CEO

Version: Current

Department: Education and Training

Next review date: January 2027

Approval date: 25 January 2024

Policy inventory number: 190.2024.01.03

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We acknowledge the Aboriginal and Torres Strait Islander Peoples, the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and community. We pay our respects to them and their cultures; and to their Elders past, present and emerging. In recognition that we are a bi-national College, we also acknowledge the Rangatiratanga of Māori as Tangata Whenua and Treaty of Waitangi partners in Aotearoa New Zealand.

1. Introduction

1.1. Purpose

This policy ensures that there is consistent approach to the provision of Royal Australian and New Zealand College of Ophthalmologists (**RANZCO**) data for research and publication.

1.2. Who is it prepared for?

This policy applies to:

- Researchers asking to use RANZCO data for research, evaluation, quality assurance or audit
- RANZCO Board, RANZCO Committee members and RANZCO Staff

1.3. Scope

This policy applies to everyone who asks to use RANZCO data for conducting research and presenting or publishing the results from the research.

This policy excludes secondary data analysis undertaken by and reported internally to RANZCO Board, Committees and staff for the purpose of RANZCO business.

1.4. Definitions

In this policy:

1.4.1 Words which are bold and in quotation marks defined in Section 1.4.3 of this policy have their defined meaning.

1.4.2 Undefined words have their normal meaning.

1.4.3 The following words have the following meaning in the context of this policy unless amended or replaced in accordance with this policy:

“Research” means any research, evaluation, quality assurance or audit activities that are undertaken using RANZCO data excluding data analyses undertaken internally or commissioned to be conducted externally by RANZCO to support mandatory and legal reporting, decision making, quality assurance and program improvements.

“Ethics Committee” means a Human Research Ethics Committee registered with the National Health and Medical Research Council in Australia and Health and Disability Ethics Committees or Institutional Ethics Committees in New Zealand.

“Data” means any information, quantitative or qualitative, that is collected by RANZCO for the delivery of its programs and as part of its routine activities including, but not limited to, the Vocational Training Program, membership and routine surveys.

“Data Custodian” means RANZCO CEO or their delegate with authority to approve the release of RANZCO data as outlined in this Policy.

2. Strategic Alignment

This policy supports the RANZCO Strategic Plan by helping RANZCO and other organisations make evidence-based decision to underpin improvements in education, training and eye health care. This policy aligns with the privacy regulations in Australia and New Zealand as specified in Clause 5.1.

3. Background

This policy has been created to ensure that:

- i) RANZCO is compliant with the relevant Australian and New Zealand regulations when providing its data for research
- ii) A consistent approach is applied to handling data requests by RANZCO
- iii) Confidentiality of people whose data is being used for research is always maintained
- iv) Findings and publications arising from the data help improve RANZCO's programs, educational activities and advocacy work in addition to the contribution to the scientific literature
- v) RANZCO data is not used for commercial purposes

4. Objectives

The Board has adopted this policy to provide a systematic approach for researchers to access and use RANZCO data for research and publication.

5. Policies

5.1. Applicable Law

This policy recognises that the provision of data is regulated by relevant privacy laws in Australia and New Zealand.

Australian privacy law has provisions for the use of routinely collected data for evaluation and research purposes. The National Health and Medical Research Council in Australia provides authority to registered Human Research Ethics Committees to approve research projects including those that involve routinely collected data. The law also allows for transfer of data internationally where the recipient entity complies with Australian Privacy Principles.

The privacy law in New Zealand has provisions for using data for statistical or research purposes without seeking individual consent if the results will not be published in a form that could reasonably be expected to identify the individual concerned which complies with Australian privacy law.

5.2. Provision of Data by RANZCO

- 5.2.1. This policy requires that data be provided to the Research Team by RANZCO following the process outlined in the flowchart in Appendix 1.
- 5.2.2. The Data Custodian should approve the release of the data only if the requirements outlined in Clauses 5.3.1 to 5.3.4 are met and the Data Custodian is reasonably satisfied that the Research Team will comply with Clauses 5.3.5 and 5.3.6.

5.3. Requirements for Access to RANZCO Data

- 5.3.1. The proposed research must generally:
- i) contribute to improving eye health care services or the RANZCO Education Programs; and
 - ii) be in the public good; and
 - iii) not be of commercial nature.

Research that is not considered to meet the above criteria by the RANZCO Data Custodian will be sent to RANZCO Board for review and approval. The decision by the RANZCO Board will be final.

- 5.3.2. The Research Team must include a RANZCO representative. The RANZCO representative can be a RANZCO Board or Committee member or RANZCO staff member. In addition to their role as an investigator, the RANZCO representative will be responsible for ensuring that the data request is viable and that the findings from the research are used to improve RANZCO's programs.
- 5.3.3. Ethics approval must be obtained from an approved Human Research Ethics Committee in Australia or New Zealand authorised to review research projects.
- 5.3.4. The data request must be for de-identified data. Identifiable data will not be made available for research and publication under any circumstances. If there are less than five data points in any category, that category will be suppressed or rolled up to a higher category.
- 5.3.5. The data storage and subsequent deletion of data must comply with the relevant legislations in Australia and New Zealand.
- 5.3.6. The data must not be used for any purpose other than as approved by the Ethics Committees.
- 5.3.7. Data deemed to be confidential or sensitive by RANZCO will not be released for research or publication.
- 5.3.8. On behalf of the Research Team, the Chief Investigator must sign a Data Usage and Reporting Agreement before the data can be released. By signing the agreement, the Research Team agrees to abide by Clauses 5.3.1 to 5.3.6, 5.4 and 5.5 of this policy.

5.4. Publication

- 5.4.1. All presentations and publications must meet the conditions outlined in the Data Usage and Reporting Agreement.
- 5.4.2. If the report is about a RANZCO program or activity, it must have a statement on the impact of the findings to RANZCO and what RANZCO has been doing or should do to address the issue identified by the research.
- 5.4.3. RANZCO Board or Committee members or staff seeking to externally publish work that was undertaken as part of internal RANZCO activities will have to

obtain ethics approval from an authorised Human Research Ethics Committee in Australia or New Zealand prior to publication. They must also obtain clearance from the RANZCO Censor-In-Chief or CEO or their delegate that publishing the proposed publication will not breach Clause 5.3.7 of this policy.

- 5.4.4. Wherever possible, publications in academic journals originating from the research must be published as open access. RANZCO will not bear the costs of open access publishing unless the work is led by RANZCO.

5.5. Authorship and Acknowledgement

5.5.1. Authorship in all publications arising from the research must be based on the Recommendations for the Conduct, Reporting, Editing, and Publication of Scholarly Work in Medical Journals by International Committee of Medical Journal Editors.

5.5.2. It must be acknowledged in all publications that the data was provided by RANZCO.

5.6. Breach of this Policy

5.6.1. Breach of this policy may lead to the approval to use RANZCO data being rescinded and the non-compliance reported to the relevant Ethics Committees.

5.6.2. Legal actions may be taken where there are breaches of the applicable legislations.

5.7. Limits to Policy

5.7.1. To the fullest extent permitted by Law, this policy does not oblige RANZCO to take any steps which are not in its interest.

5.8. Priority

5.8.1. To the extent of any inconsistency, between this policy and RANZCO's Constitution, the Constitution shall have priority.

5.8.2. This policy is also a Bylaw for the purpose of the Constitution.

6. Monitoring and Evaluation

This policy will be monitored and evaluated in accordance with RANZCO's Policy Development Process.

7. Sources of Information and Legislation

Section 95A of the Privacy Act 1988 Australia

Principle 10 of the Privacy Act 1993 New Zealand

8. Record of amendments to this document

| Page | Details of amendment | Date approved |
|-------------|-----------------------------|----------------------|
| Nil | Nil | Nil |

Appendix 1

Flow-chart outlining the RANZCO data request and approval process

