

QRME Australian Privacy Principles (APP) Policy

Contact Officer	Privacy Officer/Chief Executive Officer
Approval Date	07/04/2014
Approval Authority	QRME CEO
Date of Next Review	07/04/2015

Definitions

Australian Privacy Principles (APP) that regulate the handling of personal information by both Australian government agencies and businesses.

Personal Information means information or an opinion (including information on an opinion forming part of a database) whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.

Sensitive Information personal information about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record.

Open and Transparent Management of Personal Information

Queensland Rural Medical Education Ltd (QRME) is committed to complying with the Australian Privacy Principles (APPs) as provided in the Privacy Amendment Act 2012. In addition, QRME complies with the Health Records Act 2001 and all other applicable legislation. Further information on the Privacy Amendment Act 2012 and the Australian Privacy Principles can be accessed via the Office of the Australian Information Commissioner (OAIC): www.oaic.gov.au.

The APP policy is available to all stakeholders. The policy may be accessed on the QRME website (www.qrme.org.au), through the QRME Server ‘Policies’ or a copy may be obtained from Quickbase. A copy of the APP policy will be provided on request.

QRME has committed to comply with all Australian privacy legislation by appointing a Privacy Officer to provide information, advice and to monitor adherence to the APP across the organisation. The position of Privacy Officer is to be assumed by the Chief Executive Officer (CEO). The APP policy will be reviewed annually with reference to the relevant legislation. Any amendments will be actioned and communicated to all stakeholders.

Personal Information QRME Collects

QRME will only collect personal information that is reasonably necessary to conduct its core functions or activities. Examples of personal information that QRME collects includes:

- Your name, residential and work contact details
- Your academic and employment history including medical registration details, exam results or supervisor feedback
- Your family background

QRME may collect personal information which is regarded as “sensitive information” (as defined under the Act). An example of sensitive information QRME collects includes:

- Your medical history
- Your racial or ethnic origin
- Any indigenous affiliation

Sensitive information that is collected will be treated with the utmost security and confidentiality.

Collection of Personal Information

QRME will collect information by lawful and fair means. QRME will include a statement on any of its forms and templates indicating that the information requested is related to QRME’s primary functions or activities. At or before the time of collection, QRME will take reasonable steps to ensure that the individual is aware of:

- The contact details for QRME and the Privacy Officer
- How information will be collected and stored
- The purpose for which the information is collected, used or disclosed
- How an individual may access personal information that is being held by QRME
- How to make a complaint regarding a breach of the Australian Privacy Principles
- Third parties to whom the information may be disclosed to
- Any law or contractual agreement that requires the information to be collected; and
- The consequences (if any) for the individual if the information is not provided.

Information must be collected directly from an individual. Personal information is not collected for any purposes other than those for which QRME has obtained the individual’s consent, unless the law requires otherwise, or where other exceptional circumstances prevail as described under the Act or under QRME’s contractual obligations with GPET.

Information is not to be collected from third parties, unless the collection is required or authorised under the Act, or under QRME’s contractual obligations with GPET. If personal information is collected from a third party, all reasonable steps will be taken to ensure that the individual is aware:

- That the information has been collected from another source
- How the information will be used
- Any other person or body to whom the information may be shared, or disclosed to

QRME will determine whether unsolicited personal or sensitive information that it has received is collected for the purposes that solely relate to QRME’s primary functions or activities. If it is determined that QRME has received or collected unsolicited information, QRME will destroy or de-identify the information in a timely manner.

Use or Disclosure of Personal Information

In the course of its primary functions and activities, QRME may use or disclose personal information to third parties. Examples of how QRME may use information collected includes:

- To administer and process applications for the Australian General Practice Training Program (AGPT) and the Prevocational General Practice Placements program (PGPPP) in conjunction with GPET
- To manage the training and education of registrars with the Royal Australian College of General Practitioners (RACGP) and the Australian College of Rural and Remote Medicine (ACRRM)
- To provide reports to the Department of Health and other Commonwealth agencies as necessary
- To promote and market QRME programs to prospective applicants

QRME will only use or disclose information for the purposes for which it is being collected (primary purpose). The information may be used or disclosed for secondary purposes such as information that is related to the primary purpose, or the individual would reasonably expect the use or disclosure of the information for a secondary purpose, or QRME has the consent of the individual concerned to use or disclose the information. QRME may also use or disclose information where consent to do so has been given by the individual, as part of the arrangements for training to be undertaken by an outside organisation or individual, as required by law or under other circumstances where permitted under the Act.

QRME will not handover information to any third parties except in certain circumstances where:

- Consent of the individual concerned is obtained
- The information is required by AGPT (GPET or the Department of Health) or the two General Practice Colleges (RACGP and ACRRM)
- The information is transferred for the benefit of the individual
- Or as otherwise allowed under the Acts or required/authorised by or under law.

It can reasonably be expected that information collected will be disclosed to:

- General Practice Education and Training (GPET) and other Regional Training Providers (RTPs)
- General Practices, Supervisors and Practice Managers
- Agencies involved with relevant official administration, monitoring, registration and verification activities including the Department of Human Services (Medicare Australia), the Department of Health, the Australian Health Practitioner Regulation Agency (AHPRA), RACGP and ACRRM
- Contractors or agents who provide services to us, for example, medical educators or off-site data storage facilities.

It may be necessary for QRME to send personal information overseas, for example an overseas medical practice or training provider. Information will not be sent outside Australia without consent, or unless the transfer complies with APP 8 (Cross-Border Disclosure of Personal Information), or where QRME are obliged to do so under contract with the Commonwealth Government.

QRME will not use or disclose personal information for direct marketing purposes unless it is required for QRME's core functions and activities. Where possible, information will be de-identified before use.

More specific information about the way in which information is used or disclosed can be obtained upon request by QRME's Privacy Officer.

Accuracy and Security of Personal Information

QRME will take all reasonable steps to ensure that the data it collects is accurate, complete, relevant and up-to-date, and has been obtained directly from individuals or other reputable sources. Periodic reviews will be conducted by QRME and the individuals themselves, to ensure the quality and accuracy of data.

QRME will take all reasonable steps to ensure that personal information is protected from misuse, interference or loss, or from unauthorised access, modification or disclosure. QRME uses a range of physical and electronic security measures to ensure that the personal information collected by QRME is protected and managed confidentially. Information that is collected will be stored as a hard copy in a secure location or stored electronically with password protection. QRME shall ensure that personal information is stored for only as long as is reasonably necessary. QRME has an obligation to destroy or de-identify personal information appropriately when no longer required, or in certain circumstances.

An individual can request to deal with QRME without identifying themselves or by using a pseudonym, for example, making a complaint. If it is practicable to do so, QRME will take measures to ensure that information provided on an anonymous or pseudonymous basis is not linked with other information held about the individual.

Unauthorised disclosure of, or access to, personal information by QRME employees, contractors or agents, will be regarded as a serious breach of this policy. Appropriate action, which may include disciplinary or legal action, will be taken in such cases.

Access to, and Correction of, Personal Information

An individual may request access to personal information about the individual that is held by QRME. If the information is not readily available, the request must be made in writing to the QRME Privacy Officer in accordance with the Freedom of Information Act. QRME will respond within 5 business days after the request is made, and will give access in the manner requested if it is reasonable and practicable to do so.

QRME may deny access to information in accordance with the exemptions contained in the Act (Privacy Principle 12.3). If access is refused, QRME will provide a reason for the refusal and take such steps to grant access through the use of a mutually agreed intermediary.

If an individual is able to establish that the information held by QRME is inaccurate, out of date, incomplete, irrelevant, or misleading, QRME will take reasonable steps to amend the information. If QRME refuse an individual's request to amend or update personal information, written notice will be provided setting out the reasons for the refusal, the mechanisms available to complain about the refusal, and any other matter prescribed by regulations.

Complaints Procedure

Concerns regarding the management of personal information, and compliance with the Australian Privacy Principles, by QRME, should be directed to the Privacy Officer (contact details below). The QRME Grievance Policy has been established to provide details on how an individual may make a complaint.

Under the Privacy Act, the Privacy Commissioner has the power to investigate complaints, acts or practices that may be a breach of privacy even if there is no complaint. If an individual makes a complaint about a QRME practice that is believed to amount to arbitrary or unreasonable interference with an individual's privacy; and the individual does not believe that the matter has been resolved satisfactorily, the individual should either write to the Privacy Commissioner setting out the details of the practices which are believed to interfere with an individual's privacy, or telephone the Privacy Hotline 1300 363 992 (local call charge).

Further information on the complaints process is available in the QRME Complaint Resolution Policy.


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Document History

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20 March 2013	Review	HR	
19 March 2014	Change to Australian Privacy Principle Policy	HR	Version 1

Policy Reviewed and Approved by QRME CEO:

Scott Kitchener
Name



Signature

07/04/2014
Date