



Privacy Policy for Personal Information

Author(s):	Company Secretary and General Counsel
Department:	Governance
Owner:	Director of Governance, HR, and Commercial Services
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1. PURPOSE AND APPLICATION

- 1.1. The College is an industry organisation responsible for training, educating and representing physicians and paediatricians in Australia and New Zealand. The College is dedicated to ensuring that we comply with our obligations under the *Privacy Act 1988* (Cth) (Australia), the Australian Privacy Principles ("**APP**") and the *Privacy Act 1993* (New Zealand).
- 1.2. This Privacy Policy establishes how the College protects personal information and explains:
 - 1.2.1. what personal information the College collects;
 - 1.2.2. how the College uses/discloses that information;
 - 1.2.3. how the College stores that information; and
 - 1.2.4. your entitlement to access personal information.

By 'personal information', we mean information or an opinion about an identified individual or an individual who is reasonably identifiable.
- 1.3. This Policy applies to all personal information collected, stored, used and disclosed by the College.
- 1.4. You consent to our collection and use of your personal information in the manner detailed in our Privacy Policy, including the disclosure of your personal information to overseas recipients as set out in section 7 below.

2. WHAT PERSONAL INFORMATION THE COLLEGE COLLECTS

- 2.1. The College only collects personal information that is relevant to and reasonably necessary for the College to fulfil its purposes, functions, activities and objectives, including to serve and work with its members, employees and other individuals (collectively "you").
- 2.2. The College will only collect personal information which you have voluntarily provided to us, or consented to us collecting.
- 2.3. The main points at which your personal information may be collected by the College are:
 - 2.3.1. on visiting the College website;
 - 2.3.2. when applying to join the College as a Fellow or Trainee, or being assessed as an OTP;
 - 2.3.3. when undertaking College examinations, undertaking training or undertaking peer review;
 - 2.3.4. on submission of continuing professional development compliance records;
 - 2.3.5. when applying to and joining the College as an Employee;
 - 2.3.6. when making a donation to the College or to the Foundation; and
 - 2.3.7. when otherwise contacting or communicating with the College, including when using LiveChat on the College's website.
- 2.4. The type of information the College may collect includes, but is not limited to:
 - 2.4.1. name, address, email address, other contact details and date of birth;
 - 2.4.2. bank account details and credit card information;
 - 2.4.3. qualifications, experience, medical training and work history;
 - 2.4.4. medical registration details in Australia and/or New Zealand, and where applicable from overseas;
 - 2.4.5. hospital affiliation and any other specialist or other relevant memberships;

- 2.4.6. details of continuing professional development that you have completed;
 - 2.4.7. examination results and details of any professional qualifications, training and assessment; and
 - 2.4.8. the amount of any donation made.
- 2.5. We generally collect personal information directly from you and from third parties associated with your training or peer review, for example referees, supervisors and peer reviewers.
- 2.6. When Australian law applies, some information we collect is 'Sensitive Information' (as defined in the Privacy Act 1988 (Cth), such as memberships of a professional association). Where we collect sensitive information, it will only be collected with your consent.
- 2.7. The only personal information the College collects from you via its website is that which you agree to provide, for example, when you complete an online form or application for education or registration to attend a seminar.

3. HOW THE COLLEGE USES/DISCLOSES THAT INFORMATION

- 3.1. Your personal information will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the purpose of working with you, and providing training and education services to you.
- 3.2. The College has business relationships with third parties. In some instances, the College may disclose your personal information to third parties that we have engaged to provide us with services on your behalf such as training and education, event management, payment processing and the preparation of mailings. Wherever possible, these third parties have agreed to treat personal information they receive from us in a confidential manner.
- 3.3. In general terms, personal information held by the College may be used by the College or disclosed to third parties for one or more of the following purposes:
- 3.3.1. training, peer review, assessments, examinations and continuing professional development. This may involve the disclosure of personal information to third parties connected with training, peer review, assessments, examination and continuing professional development such as current or future supervisors, speciality societies and the Australian Medical Council and the Medical Council of New Zealand;
 - 3.3.2. membership registration;
 - 3.3.3. inviting you to attend College events and/or offering seminars endorsed or supported by the College. This may involve disclosure of your personal information to third party seminar organisers for the purpose of event registration;
 - 3.3.4. offering member benefits and other services to you, such as the College's e-bulletin updates and discounts on products and services available to College members that are provided by external partners to the College. You may request that this information not be sent to you;
 - 3.3.5. sending notices and information to Fellows about College events, elections, and committees and otherwise communicating with you. This may involve the disclosure of your personal information to third parties engaged by the College to assist with the sending of notices or information or to manage our communications with you;
 - 3.3.6. confirming your membership of the College to members of the public;
 - 3.3.7. reporting to regulators and government departments in relation to training, peer review, assessments, examination and continuing professional development or as otherwise required by law;

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- 3.3.8. providing information about members to academic or research institutions and academic or research publishers, that the Board considers to be appropriate bodies for the College to share information about members with;
 - 3.3.9. monitoring or investigating the conduct of Members under the College Constitution, the Code of Conduct and the Working Together Policy;
 - 3.3.10. procuring funding, donations or other support for the activities of the College, including the Foundation;
 - 3.3.11. if you are a College Committee Member, providing your contact information to other Members from the same College Committee;
 - 3.3.12. conducting or facilitating research or surveys for purposes related to the College or its activities; and
 - 3.3.13. otherwise collecting, using, or disclosing personal information about you in a manner consistent with the purposes, objectives, and functions of the College.
- 3.4. The College may also disclose your personal information, both within and outside Australia or New Zealand as required or permitted by law. In Australia, this includes disclosure to the following persons in order to enable the College to comply with the law, enforce our policies, or protect our or others' rights, property or safety:
- 3.4.1. Our professional advisors including lawyers, accountants, tax advisors and auditors;
 - 3.4.2. Law enforcement bodies to assist in their functions, Courts of law or as otherwise required or authorised by law;
 - 3.4.3. Debt collection agencies and other parties that assist with debt-recovery functions; and
 - 3.4.4. Regulatory or government bodies for the purposes of resolving customer complaints or disputes both internally and externally or to comply with any investigation by one of these bodies.

4. HOW THE COLLEGE STORES THAT INFORMATION

- 4.1. The College is committed to ensuring the security of your personal information. The College is responsible for ensuring that personal information held by the College about you is protected by such security safeguards as it is reasonable in the circumstances to take against loss, unauthorised access, modification, disclosure or other misuse of your personal information.

5. ENTITLEMENT TO ACCESS PERSONAL INFORMATION

- 5.1. You are entitled to request access to your personal information held by the College.
- 5.2. In normal circumstances the College will give you full access to your information.
- 5.3. However, there may be some legal or administrative reasons to deny access. If the College decides to deny access, the College will provide you with the reason why.
- 5.4. You are entitled to request the correction of any personal information, and if there is a reasonable basis for declining the correction request, you are entitled to request that a statement of correction sought but not made be attached to the information.
- 5.5. If you would like to access your personal information or if you believe that your personal information may be inaccurate, out of date or incomplete, you can make a request for access or correction by sending an email to privacy@racp.edu.au. We will respond to your request for access and/or correction within 20 working days after your request is made. We may charge reasonable costs for making information available to you.

6. KEEPING INFORMATION ACCURATE AND UP TO DATE

- 6.1. The College makes every reasonable effort to keep your information accurate, up to date and complete, in order for the College to provide the best possible service to you. You can assist by keeping the College informed of any updates such as address change, email change or legal name change. Please contact us as soon as practicably possible when your information changes by emailing us at privacy@racp.edu.au.

7. DISCLOSURE TO RECIPIENTS OUTSIDE AUSTRALIA OR NEW ZEALAND

- 7.1. Occasionally, the information you provide to the College may be accessed by or given to staff and third parties working outside of Australia or New Zealand.
- 7.2. Where Australian law applies, the information you provide to the College may be accessed by or given to staff and third parties in the US and other countries identified in the Appendix to this Privacy Policy. This list of countries is not exhaustive and may change from time to time.
- 7.3. Where disclosure is made in accordance with section 7.2 above, APP 8.1 requires the College, before it discloses personal information to an overseas recipient, to take such steps as are reasonable, in the circumstances, to ensure that the overseas recipient does not breach the APPs. If you consent to the College's disclosure of your information to overseas recipients, APP 8.1 will not apply to that disclosure so that, if an overseas recipient handles your personal information in a manner which breaches the APPs, the College will not be accountable under the Privacy Act 1988 (Cth) for the breach, nor will you be able to seek redress under the Privacy Act 1988 (Cth). We also note that the recipient may not be subject to laws or principles which are similar to the APPs.
- 7.4. The College has in place contractual arrangements with the overseas recipients, whereby the recipients are also contractually obliged to comply with the APPs and any other relevant privacy principles.

8. REPORTING A BREACH OF YOUR PRIVACY

- 8.1. If you have any concerns that your privacy has been compromised or have any other privacy related complaint, please email privacy@racp.edu.au and we will contact you within 10 business days to confirm receipt of your email. We will then investigate your complaint and provide you with our response within a reasonable time. If after receiving our response, you still consider that your privacy complaint remains unresolved, you may then, for example, take your complaint to the Office of the Australian Information Commissioner or the New Zealand Office of the Privacy Commissioner.

9. CHANGES TO OUR PRIVACY POLICY

- 9.1. We reserve the right to modify this Privacy Policy at any time by posting changes on this Privacy page.

10. CONTACTING THE COLLEGE

- 10.1. If you have any questions regarding the College's Privacy Policy or its handling of personal information please contact the Privacy Officer at Privacy@RACP.edu.au, or by telephone on 02 9256 5491 (from Australia) or +61 2 9256 5491 (from NZ).

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11. DEFINITIONS

Term	Means
“Board”	the Board of Directors of the College.
“College”	The Royal Australasian College of Physicians, CAN 000 039 047, an incorporated body limited by guarantee.
“Fellow”, “Trainee”, and “Member”	have the same meaning as in the College Constitution
“Foundation”	RACP Foundation
“OTP”	Overseas trained physician

12. HISTORY

Item	Amendment	Date
1.	Initial approval.	09 April 2014
2.	Updated Contact Telephone numbers	25 July 2014
3.	Clarify the consent to disclose personal information to overseas recipients. This reflects the introduction of new software systems, some of which hold information in offshore facilities (such as the convention software used to provide Congress attendees, providing personalised agendas on smart phones) or where development of software may occur in offshore facilities (such as the OSCAR project) – Clause 1.4	22 May 2015
4.	Specifically refer to the College holding bank account and credit card details. Updating College systems, including the introduction of the Aptify CRM system, means that the College will retain credit card and banking information, which will be held in an encrypted format	22 May 2015
5.	Clarify that contact details will be provided to members of the same College Committee	22 May 2015
6.	Detail how to report a suspected breach of privacy by the College and advise how the College will respond to reports	22 May 2015
7.	Clarify that information may be disclosed to third parties in order to provide services to members or to meet legal requirements.	22 May 2015
8.	Update to clause 2.3.7 to include when using LiveChat on the College’s Website	17 April 2018

APPENDIX: List of Countries

- United States of America
- United Kingdom
- New Zealand
- Ireland
- India