



Policy Name	PMCV Website Privacy Policy
Consultation and Date Approved	Review by Russell Kennedy Lawyers - August 2014
Responsible Officer	PMCV Chief Executive Officer / Privacy Officer

About PMCV and this general privacy policy

Our obligations under privacy laws

The Postgraduate Medical Council of Victoria Inc ABN 11 296 600 377, Association number A0038523M ("PMCV") is a non-profit association established to support the education, training and career development of hospital medical officers and hospital administrative staff.

The PMCV is committed to protecting the privacy of those involved in its processes. PMCV is bound by the Privacy Act 1988 (Cth) ("Privacy Act") and the Australian Privacy Principles ("APPs") in respect of personal information. PMCV has adopted these principles as part of its business procedures and operations.

Where PMCV works with Victorian public sector bodies, it may also be required to comply with the Information Privacy Act 2000 (Vic) ("IP Act") and the Information Privacy Principles ("IPPs").

About this general privacy policy

This general privacy policy explains how PMCV:

- protects personal information;
- collects, uses and discloses personal information you provide to PMCV;
- allows you to access/correct your personal information; and
- allows you to access the PMCV complaints process.

In this policy:

- "personal information" means information that can be used to identify an individual, and can include a name, address, date of birth as well as sensitive information; and
- "sensitive information" means information relating to health, religion, race or ethnic origin.

About PMCV

PMCV undertakes a number of activities and provides a range of services, including:

- providing members, stakeholders and others with access to information, education, professional development and other training materials, programs and resources, along with details of relevant news and events;
- accreditation activities in relation to medical interns and postgraduate year two doctors within health services and general practices (a responsibility delegated from the Medical Board of Australia);
- overseeing the workforce and training needs of international medical graduates, including their recruitment, orientation, supervision, assessment and integration;
- developing, in conjunction with other national and State bodies, mechanisms to coordinate and integrate medical postgraduate training and encourage a national approach and ongoing improvement to intern placement processes (eg. through recommendations from the National Data Management Work Group);
- conducting research and undertaking projects on a range of employment and other issues affecting health professionals, the prevocational medical workforce and other hospital staff; and
- engaging in and contributing towards State and national initiatives, forums and activities on internship, accreditation and other relevant issues (such as the National Intern Accreditation Framework).



Computer matching privacy policy

PMCV also administers the computer matching system on behalf of the Victorian Department of Health and others. Through the system, PMCV conducts matching and provides general assistance for candidates/applicants (such as students, graduates, health professionals and hospital administrators) and hospitals and other health institutions for relevant positions in those hospitals and other health institutions.

PMCV has developed a separate privacy policy in relation to its computer matching services, which is available for viewing at <http://www.computermatching.pmcv.com.au/>. Accordingly, privacy of the personal information directly related to the computer matching system is not addressed in this policy.

Types of personal information collected by PMCV

PMCV collects personal information related to:

- medical students, medical graduates, medical interns and health professions;
- staff of hospitals and other health organisations and candidates for positions in hospitals;
- prospective employees of PMCV and others in connection with PMCV's usual activities and services as described above; and
- PMCV's recruitment, corporate and other administrative functions.

The types of personal information PMCV may collect about you include:

- contact details (such as your name, address, telephone number and email address);
- personal details (such as your age, date of birth, place of birth, gender, marital status and next of kin);
- Medical Board of Australia Registration Number, Intern Placement Number and University Student Identification Number;
- current and past education; and
- qualifications and employment history, along with other information included in your curriculum vitae.

For visitors to the PMCV website, PMCV will collect information such as the visitor's IP address, internet service provider, the web page directing that visitor to the website and the visitor's activity on the website. This information is usually anonymous and PMCV does not use it to identify individuals. However, due to the nature of internet protocols, such information might contain details that identify those visitors.

How PMCV collects personal information

Generally, PMCV collects personal information directly from individuals and their representatives in the course of its usual activities and services unless it is unreasonable or impracticable to do so.

In some cases, PMCV collects information about individuals:

- through applications, other forms or agreements;
- through phone, in person or online enquiries through the "Contact Us" function on the PMCV website;
- from third parties, such as State or national regulatory, government and other bodies that PMCV undertakes research, development or other activities with;
- from researchers or contractors engaged by PMCV; and
- from public sources, such as the national health practitioner register.

PMCV collects data from its website using various technologies, including cookies. A cookie is a text file that a website sends to your browser which is stored on your computer as a tag identifying your computer. You can set your browser to disable cookies. However, some parts of the PMCV's website may not function properly (or at all) if cookies are disabled.



Purposes for which personal information is collected and used

PMCV generally only uses personal information for the primary purpose for which it is collected, as set out below, or a secondary purpose related to the primary purpose for which you would reasonably expect PMCV to use the collected information.

PMCV will make you aware of the purpose for which it collects your information by notifying you about all the relevant matters of that collection.

PMCV will not use your information for an unrelated secondary purpose unless PMCV obtains your written consent, is permitted to do so under the Privacy Act or another exception applies. Examples of exceptions could include where it is impracticable to obtain your consent and PMCV believes that collecting, using or disclosing your information is necessary to lessen a serious threat to the life, health or safety of any individual.

PMCV may collect and use personal information for the purpose of:

- communicating with you regarding PMCV's activities and services, including providing confirmation of applications, notification of additional information required, confirmation of the information provided, reminders and confirmation of results/outcomes;
- undertaking training, education and research;
- maintaining your personal information and PMCV's records and other registers;
- advising you of developments or changes to PMCV's activities and/or services;
- seeking your participation (on a voluntary basis) in advertising campaigns, events, research activities and focus groups;
- undertaking market research in relation to PMCV's services;
- improving our services, through monitoring, quality improvement activities, audits, surveys and program evaluations;
- improving PMCV's website; and
- complying with obligations under any applicable laws.

PMCV uses information regarding website visits for the purposes for which it is collected

PMCV may also collect and use personal information for marketing, business development, operational, human resources, research, referral or other corporate or administrative activities.

Disclosure of personal information

Generally, PMCV only discloses personal information:

- for the primary purpose for which it was collected;
- for purposes related to the primary purpose;
- when permitted by the Privacy Act and its APPs (and IP Act and IPPs, where applicable);
- with your consent; or
- when needed for law enforcement.

Disclosure to third parties

PMCV may disclose your personal information to third parties, such as:

- hospitals and other health organisations, including any providers of relevant intern training programs;
- the Department of Health, Medical Board of Australia, AHPRA and other State or Federal government bodies for reporting or statistical purposes (for example, the National Audit of Internship Acceptances);
- regulators or auditors of hospitals and other health organisations;
- researchers whom we collaboratively work with and other State or Territory database operators;
- third party service providers, to send correspondence or packages, process payments, recover payments, conduct surveys and perform administrative or health related functions;
- other regulatory authorities, accreditation bodies and government departments;
- professional advisers; and
- courts or tribunals where required by law.



De-identified and summary information may be communicated to the public.

PMCV will under no circumstances sell or receive payment for licensing or disclosing your personal information.

Cross-border disclosure

PMCV's technology infrastructure may make use of cloud infrastructure or servers located outside Australia. This means that PMCV may disclose and store your personal information outside Australia, taking such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the Privacy Act or the APPs in respect of your personal information.

Wherever reasonably practicable, PMCV will first seek your consent to such cross-border disclosure. Please note that where you consent to such cross-border disclosure, PMCV will be exempt from the requirements of the Privacy Act in relation to such disclosed information. Where it is not reasonably practicable for PMCV to obtain your consent PMCV will otherwise comply with the requirements of the Privacy Act.

Direct Marketing

PMCV may send you direct marketing about:

- improvements or changes to its services; or
- its other projects, activities and health system developments.

If PMCV collected your details from you personally, PMCV will reasonably expect that you agreed to receive direct marketing. PMCV will offer an opt-out procedure so that you can unsubscribe from all future marketing communications.

If PMCV proposes to use information about you collected indirectly to send you direct marketing, PMCV will seek your consent unless an exception applies under the Privacy Act. If you do not wish to receive any direct marketing, please contact PMCV to opt-out at any time.

Please note that PMCV will also comply with other laws that are relevant to direct marketing, including the Spam Act 2003 (Cth) and the Do Not Call Register Act 2006 (Cth).

If you do not provide personal information

You are not required to give PMCV all the types of personal information listed above. However, many of PMCV's services and systems cannot be provided or utilised on an anonymous basis. If you choose not to provide the information or do not provide full and complete information, this may limit PMCV's ability to provide you with the benefit of its services.

Maintenance and Security of Personal Information

All personal information is securely stored by PMCV using appropriate physical and/or electronic security technology, settings and applications, and by ensuring staff dealing with personal information are trained in our privacy policies and procedures. These policies are designed to protect personal information from unauthorised access, modification or disclosure, and from misuse, interference and loss.

There are always inherent risks in transmitting information via the internet and PMCV does not have the ability to control the security of information collected and stored on third party servers. However, in relation to PMCV's own servers, all reasonable steps are taken to ensure data security.

PMCV takes reasonable measures to destroy or permanently de-identify personal information when it is no longer required.



Access to and Correction of Personal information

PMCV encourages individuals to contact or notify them if information held about them is incorrect or has changed. A participant or other individual may seek to access, correct or update any personal information held about them by contacting PMCV's Privacy Officer (see details below). It is PMCV's policy that all requests for access be made in writing. PMCV's Privacy Officer will arrange for an access form to be sent to you, and can assist with any enquiries you may have about the process. PMCV will respond to all requests for access within 30 days. In many cases we will be able to respond well before that time.

Access will be provided unless the request is unreasonable or the Privacy Act or APPs permit or require PMCV to decline that request. Should you be refused access to your information, PMCV will explain the reasons for refusal, such as any exceptions under the privacy laws or other legal grounds for such refusal. PMCV will also provide our complaints procedure in case you wish to complain about the refusal.

Generally, access to or correction of personal information will be provided free of charge; however, PMCV reserves the right to charge you a reasonable administrative fee for giving you access to the information requested.

Complaints about a breach of privacy

If you are concerned that PMCV may have handled your personal information inappropriately or you wish to complain about a breach of your privacy, the complaint should be made in writing to PMCV's Privacy Officer (see details below). All privacy complaints are to be taken seriously and PMCV will endeavour to deal with them promptly and in accordance with our general complaints procedures.

PMCV will acknowledge receipt of your complaint, and will endeavour to deal with your complaint and provide you a response within 30 days. Some matters may require detailed investigation, and may accordingly take longer to resolve. PMCV will provide you with progress updates in that case, and may seek further information from you.

PMCV may refuse to investigate or deal with a complaint if we think it is abusive, trivial or vexatious.

If you are dissatisfied with the outcome of your complaint, you may seek internal review of the decision. Internal review will be conducted by a different person who has not previously been involved in your complaint.

If you are still dissatisfied with the outcome of your complaint after internal review, you are able to take your complaint to a privacy commissioner for resolution.

Updates to this policy

PMCV may change or replace this privacy policy at any time. Any changes to this policy will be published on the PMCV website, as appropriate.

Privacy Officer

Attention: Privacy Officer
Postgraduate Medical Council of Victoria Inc.

Postal address:

PO Box 3900
St. Vincent's Hospital, Fitzroy, Victoria, 3065

Location address:

Level 9, 27 Victoria Parade, Fitzroy, Victoria 3065
Telephone: +61 3 9419 1217
Email: pmcv@pmcv.com.au