

Privacy Policy and Confidential Information Policy



The Royal Australian and New Zealand
College of Radiologists®

Privacy Policy



The Royal Australian and New Zealand
College of Radiologists®

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RANZCR Board of Directors

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Disclaimer: The information provided in this document is of a general nature only and is not intended as a substitute for medical or legal advice. It is designed to support, not replace, the relationship that exists between a patient and his/her doctor.

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About the College

The Royal Australian and New Zealand College of Radiologists (RANZCR) is a not-for-profit association of members who deliver skills, knowledge, insight, time and commit to promoting the science and practice of the medical specialties of clinical radiology (diagnostic and interventional) and radiation oncology in Australia and New Zealand.

The College is led by clinicians who are democratically elected by the membership. The ultimate oversight and responsibility for the College is vested in the RANZCR Board of Directors.

The work of the College is scrutinised and externally accredited against industry standard by the Australian Medical Council and the Medical Council of New Zealand.

Our Vision

RANZCR as the peak group driving best practice in clinical radiology and radiation oncology for the benefit of our patients.

Our Mission

To drive the appropriate, proper and safe use of radiological and radiation oncological medical services for optimum health outcomes by leading, training and sustaining our professionals.

Our Values

Commitment to Best Practice

Exemplified through an evidence-based culture, a focus on patient outcomes and equity of access to high quality care; an attitude of compassion and empathy.

Acting with Integrity

Exemplified through an ethical approach: doing what is right, not what is expedient; a forward thinking and collaborative attitude and patient-centric focus.

Accountability

Exemplified through strong leadership that is accountable to members; patient engagement at professional and organisational levels.

Code of Ethics

The Code defines the values and principles that underpin the best practice of clinical radiology and radiation oncology and makes explicit the standards of ethical conduct the College expects of its members.

1. INTRODUCTION

1.1 Purpose and scope

- a) This Privacy Policy is important. It is intended to assist The Royal Australian and New Zealand College of Radiologists® (ABN 37 000 029 863) (the College), its staff, Fellows, College members and other individuals in understanding the College's practices for the collection, use, storage, disclosure and related handling of Personal Information and how you may access and correct information the College holds about you.
- b) The College collects, retains, uses and discloses personal and other information, in order for the College to fulfil its purposes, functions, activities and objectives as summarised in its Memorandum of Association and in the College Mission.
- c) For the purpose of this Policy reference to Personal Information includes Sensitive Information, as defined in the Australian privacy legislation, and Health Information as defined in the Australian and New Zealand legislation. The types of Personal Information collected by the College are set out in clause 3.1(a) of this Privacy Policy.
- d) This Privacy Policy should be read in conjunction with the College's Website Privacy and Terms of Use Policy, Privacy Collection Notice and Confidential Information Policy.

1.2 Definitions

In this Privacy Policy:

College means The Royal Australian and New Zealand College of Radiologists.

Health Information is a subset of Personal Information, and attracts additional protection and rules under the Australian and New Zealand privacy legislation. Health Information is defined differently under the Australian and New Zealand legislation but broadly includes all information that is Personal Information that relates to the health or disability of the person, and any health or disability services provided to that person.

Member means a member of the College.

Personal Information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Sensitive Information is a defined term in Australian privacy legislation and means information or an opinion about an individual's:

- (i) racial or ethnic origin;
- (ii) political opinions;
- (iii) membership of a political association;
- (iv) religious beliefs or affiliations;
- (v) philosophical beliefs;
- (vi) membership of a professional trade association;
- (vii) membership of a trade union;
- (viii) sexuality, sexual preferences or practices;
- (ix) criminal record;
- (x) health information; or

- (xi) genetic information.

2. COLLEGE COMMITMENT

- a) The College is committed to the protection of your Personal Information and complying with its obligations under applicable privacy laws. This Privacy Policy has been developed in line with these obligations and in particular: the Australian Privacy Principles in the Privacy Act 1988 (Commonwealth); and the New Zealand Information Privacy Principles in the Privacy Act 1993 (NZ).
- b) Some of the College's activities occur in conjunction with other organisations and third parties. The College will take care to meet its legal obligations when providing Personal Information to other organisations and third parties, as detailed in section 5 of this Privacy Policy.

3. COLLECTION OF PERSONAL INFORMATION

3.1 Information collected

- a) The College will collect and retain Personal Information about Fellows and other College members, trainees, employees, contractors, suppliers, conference delegates and other individuals who interact with the College (referred to in this Privacy Policy as "you"). The Personal Information the College may collect includes, but is not limited to:
 - (i) name, date of birth, address, phone number, fax number and email address;
 - (ii) financial information including bank account details and credit card;
 - (iii) other relevant Personal Information, including qualifications, experience, medical training and work history;
 - (iv) medical registration details in Australia, New Zealand, and where applicable other countries;
 - (v) hospital affiliations and other specialist or other relevant memberships;
 - (vi) examination results and details of professional qualifications, continuing professional development, training and assessments.
- b) The College will only collect Personal Information relevant and reasonably necessary for the College to fulfil its purposes, functions, activities, and objectives.
- c) Personal Information may be collected by the College when a person:
 - (i) visits the College website;
 - (ii) applies to join the College as a Fellow, Trainee, or employee;
 - (iii) participates in College examinations, training, peer review or other College activities;
 - (iv) submits continuing professional development records;
 - (v) communicates with the College for any reason.
- d) The College will generally collect Personal Information directly from you and from third parties associated with your training, peer review or assessment, including for example from referees, supervisors, peer reviewers and directors of training. When Personal Information is collected, the College will take reasonable steps to ensure that the individual to whom the Personal Information relates is aware of the following:

- (i) that Personal Information is being collected;
- (ii) the purpose for which it is being collected;
- (iii) who are the intended recipients of the Personal Information;
- (iv) whether the Personal Information is required under a particular law;
- (v) the consequences if Personal Information is not provided; and
- (vi) that the individual is able to contact the College and/or request access to their Personal Information.

3.2 Sensitive Information

- a) The College may collect Sensitive Information, as defined in the Australian Privacy Act, from time to time in accordance with applicable law.
- b) The College may invite individuals to disclose Sensitive Information for purposes such as the monitoring of equal opportunity or access to College programs. In such instances the purposes for which this information is requested shall be disclosed and the manner in which it will be used shall be clearly specified. Provision of this information is voluntary.

3.3 Purpose of Collection

- a) The College collects and holds Personal Information about you for the purposes of fulfilling the College's purposes, functions, actions and objectives including, but not limited to:
 - (i) facilitating the provision of services by the College (including but not limited to the College's Fellowship administration service, scholarships, the selection to and delivery of the College training program including peer review, assessments, examinations and continuing professional development programs, and the organisation of educational conferences and meetings);
 - (ii) reporting to the Medical Board of Australia, Australian Medical Council, Medical Council of New Zealand, Australian Health Practitioner Regulation Agency, a trainee's employer, training site and other regulators and bodies in relation to a trainee's training, peer review, assessments, examinations, or as otherwise permitted or required by law;
 - (iii) the assessment of international medical graduates' training, qualifications and experience. For this purpose the Medical Board of Australia, Australian Medical Council, and the Medical Council of New Zealand may disclose applicant's Personal Information to the College. The College may need to clarify this information with external institutions or individuals, and obtain additional information to complete relevant assessments;
 - (iv) monitoring and investigating the conduct of Members and employees under the College Constitution, Code of Conduct and other relevant policies;
 - (v) enabling the College to procure goods and services;
 - (vi) allowing the College to contact you;
 - (vii) organising and conducting continuing education and training programs;
 - (viii) the College's administrative functions;
 - (ix) conducting anonymous voluntary member surveys in order to gain member feedback on College matters and improve the services provided by the College to College members;
 - (x) providing member-related information to you, including invitations to College related events;

- (xi) supporting and managing password protected, member-only access to the College website and other online platforms;
- (xii) supporting and managing an online member and public directory on the College website;
- (xiii) administering the activities of a College member in fulfilling their representative duties (such as a position on the Board, Faculty Council, Committee, as a training supervisor or examiner);
- (xiv) supporting the collection of data on workforce and training matters in order to inform College and governments' policy positions;
- (xv) maintaining lists of College members to contact, i.e. with a particular area of sub-specialty interest;
- (xvi) helping the College manage its servers and the College website and to improve the College's understanding of the needs of users of the College website;
- (xvii) investigating security incidents and misuse of College facilities;
- (xviii) for use within the VOXEL register, which is a hardcopy New Zealand membership contact directory that is distributed to College members, practices, advertisers and sponsors (if you wish to be included in the VOXEL register);
- (xix) Providing membership services and benefits and maintain membership and service/benefits records;
- (xx) Assisting and supporting College trainees;
- (xxi) Providing education and training;
- (xxii) providing workplaces and practice environments which are free from discrimination, bullying and sexual harassment;
- (xxiii) operating a complaints resolution process with external review and appropriate sharing of information with hospitals and employers;
- (xxiv) investigating conduct of staff, Fellows, trainees and IMGs;
- (xxv) implementing, monitoring and maintaining 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), complaints handling and information (including external review)
- (xxvi) procuring funding, donations or other support for the activities of the College;
- (xxvii) recruiting suitable applicants to vacancies within the College; and
- (xxviii) internal administration, training, assessments and reviews.

3.4 Method of Collection

- a) The College collects Personal Information in a number of ways, including:
 - (i) directly from you through various online and hard copy registration and application forms and processes issued to facilitate the provision of services by the College;
 - (ii) from third parties, such as supervisors, peer reviewers, referees, associated with your training or review; evaluation activities; and from any area of the College, including College offices in another country;
 - (iii) via the College website;
 - (iv) via email and other electronic means, including credit card payment remittance slips;
 - (v) through online surveys where the member has not chosen to remain anonymous;

- (vi) from the Medical Board of Australia, Australian Medical Council, and the Medical Council of New Zealand and other regulatory authorities and health organisations. This may be through applicable data-sharing arrangements with key regulatory organisations in Australia and New Zealand (such as the Australian Health Practitioner Regulation Agency (AHPRA);
 - (vii) via social media; and
 - (viii) by recording of some or part of the College examinations (access to such recordings by candidates is governed by the terms of the Reconsideration, Review and Appeal of Decisions Policy).
- b) For organisations and residents (permanently or temporarily in the European Union) the College may require them to specifically (in writing or electronically) consent to receipt of College communications. For those organisations and individuals the College will otherwise endeavour to comply with EU General Data Protection Regulation.

4. USE OF PERSONAL INFORMATION

The College will only use Personal Information for the purposes for which it has been collected, unless consent for other uses has been obtained, or where the College is permitted or required by law to use the Personal Information. For the general purposes for which the College collects Personal Information see section 3.3 in this Policy.

5. DISCLOSURE OF PERSONAL INFORMATION

- a) The College may disclose Personal Information both within and outside Australia and New Zealand, for the purposes for which the information was collected, including carrying out the purposes, objectives, and functions of the College, or where permitted or required by law. This may, for instance, include the College disclosing Personal Information to a third party for one or more of the following purposes:
- (i) training, assessments, reviews, examinations, and professional development. This may include; to current or future supervisors, directors of training, specialist medical colleges and specialist medical societies and associations, hospitals and health centres, health institutions accredited for training, and other statutory bodies including the Medical Board of Australia, Australian Medical Council and the Medical Council of New Zealand;
 - (ii) enabling the College's lawyers, consultants, auditors, contractors and/or service providers to provide advice to, or undertake relevant activities for, the College;
 - (iii) registration and membership of the College;
 - (iv) educational events such as seminars and other events endorsed, held by or supported by the College. This may include disclosure of relevant Personal Information to third party seminar or event organisers for registration purposes;
 - (v) membership benefits and services offered by the College that are provided by third parties to the College. You can request that your Personal Information is not disclosed to these parties;
 - (vi) information and notices regarding College elections, committees and other College events that may be managed by a third party on behalf of the College;
 - (vii) confirming your membership of the College to members of the public;

- (viii) providing relevant information to academic or research institutions and publishers, that the College considers appropriate to share information about members with. You can request that your Personal Information is not disclosed to these parties;
 - (ix) conducting or facilitating surveys or research for purposes related to the College or its activities;
 - (x) monitoring or investigating Members' conduct under the College Constitution, Code of Conduct and other relevant policies; and
 - (xi) providing College Committee members contact information to other Committee members.
- b) In general, the College may disclose personal information to the following persons and organisations:
 - (i) Hospitals, health services and other employers of Fellows, trainees and IMGs in connection with training, IMG assessment, complaints handling and mandatory course completion;
 - (ii) Speciality societies and associations;
 - (iii) providers of goods and services to the College;
 - (iv) Government departments and agencies; and
 - (v) Internal and external reviews and quality assurance reviews of all College processes, including complaints, accreditation and review of training posts.
- c) Except as set out above, or if permitted or required to do so by law, the College will not disclose Personal Information to third parties, without your consent.
- d) Where such Personal Information is provided to third parties in connection with providing services to the College, such as training and education, event management and administrative processes, the College will take reasonable steps to ensure that the recipient only uses the Personal Information for the purposes for which it was provided.
- e) Workforce data:
 - (i) The College publishes reports and information on its selection, training and accreditation activities and International Medical Graduates' assessment as well as general information on workforce on the College website and requestors should be referred to them.
 - (ii) In the ordinary course, ad hoc reports on College activities and data will be not be provided without approval of the Chief Executive Officer.
- f) Direct marketing:
 - (i) The College will not accept requests to market products or to advertise training courses directly to Fellows and trainees and will therefore not disclose contact information to organisations requesting its use of these purposes. The College may choose to include information on the event in the College routine newsletters.

6. TRANS-BORDER DISCLOSURE

- a) The College has training sites in Australia, New Zealand and Singapore. The College may provide your Personal Information to training sites and other overseas recipients in the normal course of College business and training activities.
- b) This Privacy Policy applies equally to College activities in all countries.

- c) The College will take such steps as are necessary to ensure it complies with applicable laws in the country in which the Personal Information is held prior to using, storing or disclosing the information in another country.
- d) By becoming a member of the College you consent to the disclosure of your Personal Information, for the purposes described in this Policy, to overseas recipients and you acknowledge that as a result of your consent to such disclosure, clause 8.1 of the Australian Privacy Principles does not apply and as a consequence:
 - (ii) the College will not be accountable under the Privacy Act;
 - (iii) You will not be able to seek redress under the Privacy Act.

7. DIRECT MARKETING

- a) The College defines direct marketing as 'a form of [advertising](#) which allows communication straight to College members'.
- b) The College may use your Personal Information for direct marketing purposes.
- c) The College does not provide Personal Information to third parties for direct marketing purposes.
- d) If you do not wish to receive any marketing material from the College you can opt out by contacting the Privacy Officer appointed by the College by telephone on +61 2 9268 9777 or by email at ranzcr@ranzcr.edu.au. Alternatively, you can write to the Privacy Officer at Level 9, 51 Druitt Street SYDNEY NSW 2000 AUSTRALIA.
- e) All direct marketing communication undertaken by the College will include a notice stating that the recipient may elect not to receive this direct marketing and details of how to notify the College of this decision.

8. COOKIES AND OTHER INFORMATION

- a) A Cookie is a feature stored on your computer's hard drive by your web browser. On each visit to the College website, the College's web browser will recognise the Cookie and give the College information about your visit.
- a) The Cookie does not contain information that personally identifies you and the College does not use Cookies for that purpose.
- b) When you visit the College website and apps, the College's servers collect routine logging information such as the pages visited, the time of your visit, the web browser that you are using and the IP address associated with your request. The College uses this information and Cookies to learn about your preferences and the way that you use the College website, so that it can improve the College website.
- c) Most browsers accept Cookies automatically, but you should also be able to alter the settings of the browser to refuse Cookies.
- d) You should note that de-activating Cookies may mean that you will no longer be able to utilise the full operational capabilities of the College website.
- e) In some circumstances, when used in conjunction with other information, the IP address associated with your online interaction with the College can be used to identify you. The

College will not attempt to do so nor will it assist anyone else in doing so, unless it is necessary in the course of an authorised College security or misuse investigation, or the College is required or authorised to do so by law.

- f) Some pages on the College website use Google Analytics or other third-party tools to better understand how users use the College website. This makes information similar to that of routine server logs available to Google or other third-party statistics providers. The analytic reports that are produced are aggregated and do not identify users.

9. STORAGE AND SECURITY OF OTHER PERSONAL INFORMATION

9.1 Storage

- a) The College stores Personal Information in a combination of secure computer based storage facilities and paper based files and records.
- b) The College generally uses accepted technology and security so that it is satisfied that Personal Information is transmitted safely to it through the internet or other electronic means.

9.2 Security

- a) The College will use its reasonable endeavours to protect your Personal Information from misuse, unauthorised access, disclosure, modification or loss.
- b) Despite its reasonable endeavours, the College is unable to ensure or warrant the security of any Personal Information transmitted to the College and all Personal Information disclosed by you to the College is at your own risk.
- c) The College will not hold Personal Information for longer than is permitted or required to be kept by the applicable law. Any Personal Information that the College holds that is no longer required will be disposed of safely and securely.

9.3 Managing a data or privacy breach

- a) A privacy breach is the result of unauthorised access to, or collection, use or disclosure of personal information. All privacy breaches (actual or potential) must be reported to the Privacy Officer without delay.
- b) If the College becomes aware of a privacy breach, or suspected breach, the College will:
 - (i) Take appropriate action to contain the breach and undertake a preliminary assessment of the breach;
 - (ii) Evaluate the risks associated with the breach;
 - (iii) Determine who needs to be notified, including whether the person(s) concerned, and/or Office of the Privacy Commissioner, should be notified, and how that notification should occur; and
 - (iv) Take appropriate action to prevent a repeat of the breach.
- c) The Privacy Officer is responsible for managing the response to all privacy breaches.
- d) Note: Changes to privacy legislation in Australia and proposed changes in New Zealand include a mandatory reporting of data breaches to the Office of the Privacy Commissioner and in serious cases the person(s) concerned. The Privacy Officer must

check if mandatory reporting has been introduced when managing any data breach under this Policy.

10. ACCESS TO PERSONAL INFORMATION

- a) An individual is entitled to request access to their own Personal Information as stored by the College.
- b) The College will take steps to confirm the identity of the individual making the request before access to Personal Information is provided.
- c) If you would like to exercise your right to access your Personal Information please contact the Privacy Officer appointed by the College by telephone on +61 2 9268 9777 or by email at ranzcr@ranzcr.edu.au. Alternatively, you can write to the Privacy Officer at Level 9, 51 Druitt Street SYDNEY NSW 2000 AUSTRALIA.
- d) The College will meet its legal obligations under the applicable privacy law when responding to a request for Personal Information from the person concerned. This includes: responding to the request within the applicable statutory timeframe, identifying any reasons permitted under the applicable law for refusal of the request or part of the request; or transferring the request or part of the request to another organisation.
- e) The information requested will be provided in the manner requested, unless the applicable privacy law allows the information to be provided in a different manner in the particular circumstances.
- f) If permitted by law the College reserves the right to charge a reasonable fee for making information available in response to a request. If a fee is charged the College will follow any applicable guidelines for charging that are available in Australia or New Zealand, whichever applies in the relevant case.
- g) The College may refuse to grant you access to your Personal Information to the extent that such denial is permitted or required by the applicable privacy law. If the College refuses all or part of your request to access your Personal Information, the College will meet its obligations under the applicable privacy legislation including informing you of:
 - (i) the reason(s) for the refusal;
 - (ii) the mechanisms to complain about the refusal; and
 - (iii) any other matter prescribed by the applicable privacy law or regulations.

11. CORRECTION OF PERSONAL INFORMATION

- a) The College will not use or disclose Personal Information it collects and holds without taking reasonable steps to check it is accurate, complete, relevant, up to date, and not misleading.
- b) The College will take reasonable steps to update records to ensure as far as possible that the Personal Information it holds is accurate, complete and correct. The College will not take responsibility for incorrect data if an individual has failed to notify, or has erroneously notified the College of changes to their Personal Information, or where another organisation provides erroneous information on your behalf.

- c) All College members are able to correct their personal information by logging in to the members section of the College website.
- d) You may contact the Privacy Officer appointed by the College to request correction of Personal Information that you consider is inaccurate, out-of-date, incomplete, or misleading. You can contact the Privacy Officer appointed by the College by telephone on +61 2 9268 9777 or by email at ranzcr@ranzcr.edu.au. Alternatively, you can write to the Privacy Officer at Level 9, 51 Druiitt Street SYDNEY NSW 2000 AUSTRALIA.
- e) The College will not update records on the basis of information provided by third parties unless the third party has legal authority or the individual concerned has provided consent for the third party to act as their agent.
- f) The College will not use or rely on information that it knows to be incorrect or misleading.
- g) If the Privacy Officer is satisfied that your Personal Information is inaccurate, out-of-date, incomplete or irrelevant, or if you request the College to correct your Personal Information then the College will take reasonable steps to correct your Personal Information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete and relevant.
- h) The College will respond to a request to correct Personal Information it holds about you within the statutory timeframes set out in the Australian Privacy Act or New Zealand Privacy Act, whichever applies in the particular circumstances.
- i) The College will not charge you a fee for the making of the request or for correcting your Personal Information.
- j) If the College refuses your request to correct your Personal Information, the College will meet its obligations under the applicable privacy legislation; including informing you of:
 - (i) The reason(s) for the refusal¹;
 - (ii) the mechanisms available to complain about the refusal; and
 - (iii) any other matters prescribed by the applicable privacy law or regulations.

12. CONSENT

- a) Fellows and other College members, trainees, employees, contractors, suppliers, conference delegates and other individuals who interact with the College acknowledge and agree that the College is permitted to collect, store, use and disclose Personal Information in the manner set out in this Privacy Policy and in accordance with the Australian or New Zealand Privacy Principles and applicable law.

13. COMPLAINTS AND CONCERNS

- a) If you are concerned that the College may have handled your Personal Information inappropriately or breached the applicable privacy law, or you have a complaint

¹ Under Australian law the College does not have to provide the reason(s) for the refusal to the extent it would be unreasonable to do so. There is no equivalent exception in the New Zealand Privacy Act, however if the person then requests the grounds in support of the reason, the College may refuse to give the grounds if to do so would prejudice the interests protected under sections 27 – 29 of the NZ Privacy Act as set out in s44 of the Act.

regarding an interference with your privacy, please contact the Privacy Officer by telephone on +61 2 9268 9777 or by email at ranzcr@ranzcr.edu.au. Alternatively, you can write to the Privacy Officer at Level 9, 51 Druitt Street SYDNEY NSW 2000 AUSTRALIA.

- b) Upon receipt of your complaint, the College will:
 - (i) confirm receipt of your complaint;
 - (ii) advise you what steps will be taken to investigate your complaint;
 - (iii) provide an approximate timeframe within which your complaint will be resolved;
 - (iv) make a decision in relation to your complaint; and
 - (v) inform you of the outcome of your complaint and the reasons for the decision.
- c) In response to any complaint, the College will:
 - (i) treat all complaints sensitively, seriously and sympathetically;
 - (ii) attempt to resolve the matter promptly; and
 - (iii) keep accurate records of your complaint, the investigation of your complaint and the outcome reached.

14. CHANGES TO THIS POLICY

The College may amend this Privacy Policy at any time and will ensure that future amendments comply with applicable law.

15. RELATED POLICY DOCUMENTS

- Privacy Collection Notice
- Website Privacy and Terms of Use Policy
- Confidential Information Policy

16. CONTACT DETAILS

If you have any queries about this Privacy Policy, wish to gain access to or correct Personal Information the College may hold about you or have any complaints regarding an interference with your privacy or the way we manage your Personal Information you may contact the Privacy Officer appointed by the College by telephone on +61 2 9268 9777 or by email at ranzcr@ranzcr.edu.au. Alternatively, you can write to the Privacy Officer at Level 9, 51 Druitt Street SYDNEY NSW 2000 AUSTRALIA.

17. APPENDICIES

- A. Privacy Collection Notice

RANZCR

Privacy Collection Notice

1. Contact Details

The Royal Australian and New Zealand College of Radiologists

ABN 37 000 029 863
Level 9, 51 Druitt Street
SYDNEY NSW 2000 AUSTRALIA.
Phone: +61 2 9268 9777
Fax: 61 2 9268 9799
Email: ranzcr@ranzcr.edu.au
Website: <http://www.ranzcr.edu.au/>

2. Collection of Personal Information

2.1. The Royal Australian and New Zealand College of Radiologists (**the College**), collects and holds personal information about you for the purposes of:

- (a) facilitating the provision of services by the College (including but not limited to the College's Fellowship administration service, scholarships, the selection to and delivery of the College training program and continuing professional development program and the organisation of educational conferences and meetings);
- (b) enabling the College to procure goods and services;
- (c) allowing the College to contact you;
- (d) organising and conducting continuing education and training programs;
- (e) the College's administrative functions;
- (f) conducting voluntary member surveys in order to gain member feedback on College matters and improve the services provided by the College to College members;
- (g) providing member-related information to you; including invitations to College related events;
- (h) supporting and managing password protected, member-only access to the College website and other online platforms;
- (i) supporting and managing an online member and public directory on the College website;
- (j) administering the activities of a College member in fulfilling their representative duties (such as a position on the Board, Faculty Council, Committee, as a training supervisor or examiner);
- (k) supporting the collection of data on workforce and training matters in order to inform College and governments' policy positions;
- (l) maintaining lists of College members to contact, i.e. with a particular area of sub-specialty interest;
- (m) providing membership services and benefits and maintain membership and service/benefits records;

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- (n) assisting and supporting College trainees;
- (o) providing education and training;
- (p) providing workplaces and practice environments which are free from discrimination, bullying and sexual harassment;
- (q) operating a complaints resolution process with external review and appropriate sharing of information with hospitals and employers;
- (r) investigating conduct of staff, Fellows, trainees and IMGs;
- (s) implementing, monitoring and maintaining 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), complaints handling and information (including external review)
- (t) procuring funding, donations or other support for the activities of the College;
- (u) recruiting suitable applicants to vacancies within the College;
- (v) internal administration, training, assessments and reviews.
- (w) helping the College manage its servers and the College website and to improve the College's understanding of the needs of users of the College website;
- (x) investigating security incidents and misuse of College facilities; and
- (y) for use within the VOXEL register, which is a hardcopy New Zealand membership contact directory that is distributed to College members, practices, advertisers and sponsors (if you wish to be included in the VOXEL register).

2.2. The College collects personal information from you in a number of ways including:

- (a) directly from you through various online and hard copy registration and application forms and processes issued to facilitate the provision of services by the College;
- (b) from third parties, such as supervisors, peer reviewers, referees, associated with your training or review; evaluation activities; and from any area of the College, including College offices in another country;
- (c) via the College website;
- (d) via fax and other electronic means, including credit card payment remittance slips;
- (e) through online surveys where the member has not chosen to remain anonymous;
- (f) from the Medical Board of Australia, Australian Medical Council, and the Medical Council of New Zealand and other regulatory authorities and health organisations. This may be through applicable data-sharing arrangements with key regulatory organisations in Australia and New Zealand (such as the Australian Health Practitioner Regulation Agency (AHPRA));
- (g) via social media; and
- (h) by recording of some or part of the College examinations (access to such recordings by candidates is governed by the terms of the College policy or Reconsideration, Review and Appeal of Decisions Policy).

2.3. If you choose not to provide your personal information to the College then it may not be possible for the College to provide you with services.

Appendix A

3. Disclosure of Personal Information

- 3.1. The College will not disclose personal information to third parties except to hospitals, practices, health institutions accredited for training, medical colleges and specialist medical societies, government and statutory bodies (as required by law) and service providers.
- 3.2. The College has training sites in Australia, New Zealand and Singapore. The College may provide your information to these and other overseas recipients in the normal course of College business and training activities. You hereby consent to the disclosure of your personal information to overseas recipients and you acknowledge that as a result of your consent to such disclosure, clause 8.1 of the Australian Privacy Principles does not apply.

4. Access to Personal Information and Complaints Procedure

- 4.1. The College's Privacy Policy available at (<https://www.ranzcr.com/search/ranzcr-privacy-policy>) contains information about how you may access and seek correction of your personal information, complain about a breach of the Australian Privacy Principles by the College and how the College will deal with such a complaint.

Confidential Information Policy



The Royal Australian and New Zealand
College of Radiologists®

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RANZCR Board of Directors

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Disclaimer: The information provided in this document is of a general nature only and is not intended as a substitute for medical or legal advice. It is designed to support, not replace, the relationship that exists between a patient and his/her doctor.

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About the College

The Royal Australian and New Zealand College of Radiologists (RANZCR) is a not-for-profit association of members who deliver skills, knowledge, insight, time and commit to promoting the science and practice of the medical specialties of clinical radiology (diagnostic and interventional) and radiation oncology in Australia and New Zealand.

The College is led by clinicians who are democratically elected by the membership. The ultimate oversight and responsibility for the College is vested in the RANZCR Board of Directors.

The work of the College is scrutinised and externally accredited against industry standard by the Australian Medical Council and the Medical Council of New Zealand.

Our Vision

RANZCR as the peak group driving best practice in clinical radiology and radiation oncology for the benefit of our patients.

Our Mission

To drive the appropriate, proper and safe use of radiological and radiation oncological medical services for optimum health outcomes by leading, training and sustaining our professionals.

Our Values

Commitment to Best Practice

Exemplified through an evidence-based culture, a focus on patient outcomes and equity of access to high quality care; an attitude of compassion and empathy.

Acting with Integrity

Exemplified through an ethical approach: doing what is right, not what is expedient; a forward thinking and collaborative attitude and patient-centric focus.

Accountability

Exemplified through strong leadership that is accountable to members; patient engagement at professional and organisational levels.

Code of Ethics

The Code defines the values and principles that underpin the best practice of clinical radiology and radiation oncology and makes explicit the standards of ethical conduct the College expects of its members.

1. INTRODUCTION

1.1 Purpose

This Confidential Information Policy establishes:

- (a) which information the College will treat as Confidential Information; and
- (b) the responsibilities of Staff Members, Members and Stakeholders who receive Confidential Information.

Staff Members, Members and Stakeholders may come into contact with Confidential Information in the ordinary course of their dealings with the College.

Staff Members, Members and Stakeholders will, at all times, maintain the confidentiality of all Confidential Information obtained in the course of any College activities and not disclose such information to any person otherwise than in the proper performance of their duties and responsibilities and as permitted or required by law.

Staff Members, Members, and Stakeholders obligations and responsibilities in relation to Personal Information (including Health Information and Sensitive Information) are primarily covered under the Privacy Policy, however Personal Information may also be Confidential Information within the meaning of this Policy, and in that circumstance, the obligations and requirements under this Policy will apply, in conjunction with the obligations in the Privacy Policy.

The College may discipline any Staff Member who discloses Confidential Information other than in accordance with this Policy. The nature of disciplinary action will depend upon the seriousness of the circumstances of the unauthorised disclosure.

1.2 Definitions

In this Confidential Information Policy:

College means The Royal Australian and New Zealand College of Radiologists.

Confidential Information means any non-public, protected, or proprietary information disclosed by one Party (**Disclosing Party**) to the other Party (**Receiving Party**), including:

- (a) any information, document, drawing or specification however developed, created, made, discovered or conceived which is protected by copyright or otherwise protected or capable of protection by law anywhere;
- (b) technical data;
- (c) research and development information including procedures and results;
- (d) business records, video recordings (whether of examinations or otherwise) information, notes, products, know how, trade secrets, engineering or other data;
- (e) processes, designs, specifications, formulae;
- (f) manufacturing, planning or marketing procedures, techniques or information;
- (g) business plans;
- (h) accounting procedures or financial information;
- (i) names and details of Members, stakeholders, consumers, examination candidates customers, suppliers and agents;

- (j) details of Staff Members;
- (k) secret information;
- (l) commercial information about the College and persons with whom the College deals;
- (m) mailing lists, including Members' and sponsors' address lists;
- (n) information of a confidential nature provided to the College by any third person including collaborators and contract researchers;
- (o) experimental material and any other experiments in progress reasonably regarded as confidential;
- (p) any information marked confidential or which the College informs Staff Members, Members and/or Stakeholders is confidential or a trade secret;
- (q) any information which would contravene the College's Mission if disclosed;

and whether:

- (r) oral, written, recorded or stored by electronic, magnetic, electromagnetic or other form of process or otherwise in a machine readable form;
- (s) translated from the original form, recompiled, made into a compilation, wholly or partially copied, modified, updated or otherwise altered; or
- (t) originated or obtained by, or coming into the possession, custody, control or knowledge of the College or its Related Bodies Corporate either alone or jointly;

but excluding:

- (u) information available to the public;
- (v) information in the realm of the medical industry;
- (w) information which Members lawfully possessed prior to their association with the College; and
- (x) information which a Staff Member lawfully possessed prior to their employment with the College.

Member means a member of the College.

Stakeholders means all committees, office bearers, authorised representatives, individuals or entities controlled by or interacting with the College. This includes contractors, external organisations and members of College committees who may not be College Members or Staff Members.

Personal Information has the same meaning as it does in the Privacy Act 1988 (Cth) (Australia) or any successor legislation, and in the Privacy Act 1993 (New Zealand) or any successor legislation;

Related Bodies Corporate has the same meaning as in the Corporations Act 2001 (Cth);

Sensitive Information has the same meaning as it does the Privacy Act 1988 (Cth) (Australia) or any successor legislation; and

Staff Member means any person working in a permanent, temporary, casual, termed appointment or honorary capacity within the College and for the avoidance of doubt includes

contractors, consultants, and other workers at the College, including all personnel Associated with third parties.

2. RESPONSIBILITIES

- (a) All Staff Members, Members and Stakeholders are expected to be aware of, understand and comply with this Confidential Information Policy and the Privacy Policy.
- (b) All Staff Members, Members and Stakeholders will hold all Confidential Information in trust and confidence and will only use, store or disclose Confidential Information as may be necessary in the performance of their duties for the College, and for no other purpose, except as otherwise required or permitted by law or contract.
- (c) The Receiving Party is expected to:
 - (i) use Confidential Information solely for the purpose for which it is disclosed and not for any other purpose without the prior written consent of the Disclosing Party;
 - (ii) take appropriate measures to safeguard Confidential Information against theft, loss or negligent disclosure to others;
 - (iii) use their reasonable endeavours to prevent the use or disclosure of Confidential Information by third parties;
 - (iv) not discuss Confidential Information within the hearing of other persons who do not have permission from the Disclosing Party to receive the information;
 - (v) follow safe computing guidelines. This includes not sharing a private login, user ID or password with any other person. The Receiving Party is responsible for any breach of confidentiality resulting from their failure to safeguard access to electronic information systems (including mobile devices).
- (d) Care should be taken to prevent unauthorised persons from obtaining access to the College's business premises. When outside persons are necessarily admitted to the premises, then care and attention should be taken to ensure that the person does not see or have access to any Confidential Information.
- (e) Staff Members, Members and Stakeholders will not use Confidential Information for personal benefit or profit.

3. DISCLOSURE

Staff Members, Members and Stakeholders must not use, disclose or copy any Confidential Information, unless:

- (a) it is necessary in order to achieve the agreed purpose for which the Confidential Information was disclosed; or
- (b) is for a proper purpose of the College and in accordance with College policies and processes; or
- (c) disclosure is required or permitted by law or contract; or
- (d) prior consent for the disclosure has been obtained from the College; or
- (e) the Confidential Information is already known to the entity to which it is disclosed; or
- (f) personal safety is in question; or

- (g) the information is in the public domain (in which case it is no longer Confidential Information).

All requests by external parties or persons for the disclosure of Confidential Information should be directed to the Privacy Officer, unless the Staff Member, Member, or Stakeholder has authority from the College to respond to the request. You can contact the Privacy Officer appointed by the College by telephone on +61 2 9268 9777 or by email at ranzcr@ranzcr.edu.au. Alternatively, you can write to the Privacy Officer at Level 9, 51 Druiitt Street SYDNEY NSW 2000 AUSTRALIA.

Use or disclose of video recordings of candidates performance in College examinations is restricted, and subject to College policies:-

- Reconsideration, Review and Appeal of Decisions Policy
- Privacy Policy

This Policy does not prevent staff members, members, or stakeholders from good faith disclosures protected under the Protected Disclosures Act (New Zealand) or any other law.

If a Staff Member, Member, or Stakeholder has any questions or concerns regarding this Policy or the appropriate use or disclosure of Confidential Information they should discuss these concerns with the Privacy Officer. You can contact the Privacy Officer appointed by the College by telephone on +61 2 9268 9777 or by email at ranzcr@ranzcr.edu.au. Alternatively, you can write to the Privacy Officer at Level 9, 51 Druiitt Street SYDNEY NSW 2000 AUSTRALIA.

Each Staff Member, Member, or Stakeholder must promptly report to the College any known violation of this Policy, or other related policies including the Privacy Policy, by a staff member, member or stakeholder.

4. RETURN OF CONFIDENTIAL INFORMATION

- (a) Upon the written request of a Disclosing Party, all copies of Confidential Information will either be promptly returned to the Disclosing Party or destroyed by the Receiving Party, except that the Receiving Party shall not be required to destroy any computer files created during automatic system back up which are subsequently stored securely by the Receiving Party.
- (b) Notwithstanding clause 4(a), the Receiving Party shall have the right to retain, at its cost and subject to this Confidentiality Policy, one copy of the Confidential Information for the purpose of monitoring the performance of its obligations, and for defending itself against any actual or possible future proceedings, claims, or legal action against it.
- (c) Staff Members will immediately deliver to the College all Confidential Information in their control physically capable of delivery either at:
- (i) the expiration of their employment with the College; or
 - (ii) any time following a reasonable request made by a person authorised by the College.
- (d) If requested by the College, Staff Members will instead of delivering the Confidential Information as provided in clause 4(c):
- (i) delete all Confidential Information held electronically in any medium in their control (in the case of computer software or other computer data, by erasing it from the magnetic media on which it is stored such that it cannot be recovered or in any way reconstituted); and

- (ii) certify in writing to the College that the Confidential Information has been destroyed.
- (e) The obligations of Staff Members pursuant to this clause 4 will survive employment with the College and are enforceable at any time at law or in equity and continue to the benefit of and are enforceable by the College.

5. OWNERSHIP

All Confidential Information shall remain the property of the Disclosing Party.

6. FAILURE TO COMPLY

- (a) The Receiving Party must:
 - (i) notify the Disclosing Party immediately if it becomes aware of a suspected or actual breach of this Policy; and
 - (ii) take all reasonable steps, at its own expense, required to prevent or stop the suspected or actual breach.
- (b) A breach of this Confidential Information Policy may cause harm to the College and an appropriate remedy may be sought.
- (c) Breaches of this Policy by a Staff Member will be considered a serious breach of a Staff Member's terms and conditions of employment and may result in disciplinary action, including dismissal of employment.
- (d) The disciplinary measures referred to in clause 7 will also apply to any senior manager who directs or approves such actions, or has knowledge of them and does not move promptly to correct them in accordance with this Confidential Information Policy.

7. COST RECOVERY

If a Staff Member breaches this Policy, the College may seek reimbursement of any expense incurred by it as a result of that breach of this Policy and may take any other legal action deemed applicable.

The College may set off the amount recoverable under this Policy from any amount otherwise payable by the College to a Staff Member as permitted under the applicable law.

8. IMPLEMENTATION

The College will ensure Staff Members, Members and Stakeholders are aware of this Policy. Staff Members, Members and Stakeholders who wish to clarify any aspect of this Policy may do so by contacting the Privacy Officer (as referenced in the Privacy Policy).

9. RELATED DOCUMENTS

- Privacy Policy
- Conflict of Interest Policy