

POLICY

ROYAL AUSTRALASIAN COLLEGE OF SURGEONS

Division:	Relationships & Advocacy	Ref. No.	REL-RMT-001
Department:	Relationships Management		
Title:	Privacy of Personal Information		

Approved By: Chief Operating Officer
Document Owner: Privacy Officer

Original Issue: November 2011
Version: 4
Approval Date: November 2020

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As it relates to web information collection, the usage analysis software used by RACS in connection with the RACS website records information that includes, but is not restricted to:

unique visitors and sessions;
 requested pages, downloads, search terms used, posted forms, status and errors, hits and bytes downloaded per directory, file, and file type;
 entrance pages, exit pages, click paths, click to and click from and length of session;
 domains, countries, and IP addresses; and
 browsers, platforms, and robots.

The statistics are de-identified at the time of recording. This information is used for administrative purposes, including to improve and assess services, and to monitor usage patterns in order to improve navigation and design features - helping users to get information more easily.

RACS website will also use cookies to manage login and logout.

3.5. Disclosure of personal information

3.5.1. Common situations in which RACS may disclose personal information are detailed below.

Personal information required by hospitals, health services and other employers of Fellows, Trainees and SIMGs in connection with surgical training, SIMG assessment, complaints handling and completion of mandatory RACS courses.

To National Standards Regulatory Bodies (eg. the Australian Medical Council (AMC)), surgical specialties and societies in connection with surgical training, SIMG assessment and other related activities

To government departments, at both state and federal levels, in relation to certain activities, for example, workforce data analytics.

To members of the public, but only to the extent of confirming the status and specialty of a Fellow, Trainee or SIMG

Where required by law

Outside of the above situations, RACS will not disclose personal information without the individual's express written consent. Staff approached for the release of personal information should refer to the Disclosure of Personal Information procedure.

3.5.2. Enquiries by the public regarding a Fellow, Trainee or SIMG

Apart from confirming status and specialty of a Fellow, Trainee or SIMG, no personal information will be disclosed to a member of the public without written consent except as required by law. Members of the public include spouses, family members and colleagues.

3.5.3. Overseas disclosure

In certain situations, RACS may disclose Personal Information to persons or organisations based overseas. These countries in which these recipients may be based include, but are not limited to

- Australia
- New Zealand
- Singapore
- USA
- Other overseas jurisdictions

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3.5.4. Employee data

There may be circumstances where RACS is required to disclose employee records to a third party including prospective employers as well as government and regulatory authorities. RACS shall only disclose personal information, including employee records, to these entities in accordance with the Privacy Legislation.

3.5.5. Workforce data and Research Data

RACS publishes reports, journals and publications including information on its selection, training and accreditation activities and SIMG assessments, as well as general information on surgical workforce on RACS website and requestors should be referred to them.

The primary source for workforce and training information is RACS Activities Report. Most requests can be handled by reference to this report. In the ordinary course, ad hoc reports on RACS activities and data will only be provided under contractual agreement and with approval of the Chief Executive Officer.

3.5.6. Direct marketing

RACS will not accept requests to market products or to advertise training courses directly to Fellows and Trainees and will therefore not disclose personal information to organisations requesting its use for these purposes. The Executive General Manager, People and Culture may choose to include information on the event in RACS routine newsletters, without releasing any individual identifying information.

3.6. Access to personal information

An individual may contact the Privacy Officer to access their personal information held by RACS. They will be required to provide their request in writing. The request will be addressed in accordance with the Privacy Legislation. RACS may, in accordance with the Privacy Legislation, request a fee to cover the cost of access to, or correction of (see 3.8), personal information.

RACS may request a copy of an individual's identification before releasing the information to protect the personal information.

RACS staff should contact the People and Culture team regarding access to their personal information.

3.7. Responding to access to information requests

RACS will respond to access to information requests in accordance to requirements of the Privacy Legislation.

3.8.

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