

Policy Name	PMCV Privacy Policy and Collection Statement (Including PMCV Allocation and Placement Service)
Responsible Officer	PMCV Chief Executive Officer / Privacy Officer

About PMCV and this Privacy Policy and Collection Statement

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”).

PMCV also operates an Allocation and Placement Service system (“APS System”) and provides it to assist the Victorian Department of Health, Speciality Training Colleges, and other stakeholders. The APS System provides for online matching and assistance for candidates/applicants (“participants”), including students, graduates and health professionals in hospitals, health services and other organisations (“health organisations”). PMCV also develops Accreditation processes and standards in connection with its work and the APS.

About this general privacy policy

This 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:

- This policy explains how PMCV: “Personal Information” means according to the Privacy Act, personal information is any information or opinion about an identified individual or an identifiable individual, whether the information or opinion is true or not and whether the information is recorded in a material form or not. Examples include a person’s name, address, telephone number, and date of birth.
- “Sensitive Information” means personal information includes sensitive information about a person such as information or opinion about an individual’s racial or ethnic origin, political opinion, religious beliefs, sexual orientation, criminal record, or health information.
- “Health Information” means Health Information is a type of Sensitive Information. Health Information includes health and genetic information about an individual.

About PMCV

PMCV undertakes several 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 (e.g., 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).

PMCV also administers the APS System, including the computer matching system on behalf of the Victorian Department of Health, Speciality Training Colleges 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 is exempt from the Privacy Acts when it collects and handles employee records. However, it is PMCV's policy to protect the personal information of its employees.

PMCV is also required to comply with other laws, including more specific privacy legislation in some circumstances and in some jurisdictions (where applicable), such as:

- applicable data protection and privacy legislation of the other national and international jurisdictions in which PMCV operates;
- applicable Australian State and Territory and New Zealand health privacy legislation when PMCV collects and handles certain health information;
- *Spam Act 2003* (Cth);
- *Do Not Call Register Act 2016* (Cth); and
- Notifiable Data Breaches Scheme under Part IIIC of the *Privacy Act*.

Types of personal information collected by PMCV

PMCV collects personal information related to:

- medical students, medical graduates, medical interns, registrars, 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, mobile 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.

PMCV collects personal information regarding participants in the APS System, including their:

- name, date of birth, contact details;
- residency status;
- employment/placement preferences;
- Medical Board of Australia Registration Number, Medical Intern Placement Number;
- current and past education;
- qualifications and employment history (along with other information included in candidate/applicants' curriculum vitae); and
- referees' contact details and referee feedback.

PMCV may also collect sensitive information (in particular health information) from participants, including those who apply for special consideration. This information is kept outside of the APS System.

Referees

PMCV collects personal information of referees, including their name, phone number, email address or other contact details, current position and employing organisation.

Website visitors who are not registered participants.

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.

Personal information does not include:

- anonymous information (e.g., anonymous answers to surveys);
- aggregated information (e.g., data about how users use our website that reflects trends without identifying the sample);
- de-identified information; or
- information about companies or other entities which does not identify individuals.

Collection of sensitive information

Sensitive information is a special category of personal information and is subject to stricter legal requirements for collection, storage, use and disclosure.

Under the *Privacy Act*, information will be considered sensitive information where it is information or an opinion about a person'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;
- criminal record;
- health information; or
- genetic information

PMCV only collects sensitive information where it is reasonably necessary for its functions or activities and either the individual has consented and is required or authorised by or under law (including applicable privacy legislation) to do so.

For example, we may collect:

- information about an individual's membership of other professional associations;
- information about dietary requirements or mobility needs when we conduct examinations or events such as conferences and seminars; or
- information about medical conditions in the context of assessments as part of a special consideration application or so that we can implement special arrangements.

Collection of sensitive information

Directly from you:

PMCV tries to collect personal information about you directly from you;

- PMCV primarily collect information about you when you use or request a product or service, complete a survey, questionnaire or form, through assessment or assignments, or when you communicate with us by email, telephone, in person or in writing;
- PMCV also collect information about you if you are providing services to us or if you apply for employment with us.

From third parties:

PMCV may obtain personal information from a third party as required.

These include:

- other educational providers and contractors that assist us in running our educational programs (including organisation and conducting assessments);
- past and current employers, medical educators and supervisors;
- Australian Government Authorities such as the Commonwealth Department of Health, Medicare, ASIC and the ATO;
- professional associations such as the Medical Board of Australia (MBA);
- overseas registering authorities including Medical Council of New Zealand and the General Medical Council of the UK; and
- insurers in relation to professional indemnity insurance.

From publicly available sources

PMCV may also collect personal information from the public domain, for example from public websites, directories and databases and other publicly available sources.

From social media

PMCV may collect personal information from published social media posts that you have uploaded to social media platforms.

Unsolicited Personal Information

Unsolicited Personal Information is Personal Information PMCV receives that we have taken no active steps to collect.

Unless the unsolicited personal information is reasonably necessary for one or more of our functions or activities, the PMCV's approach is to destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

Purpose for which personal information is collected and used

PMCV 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;
- sharing Victorian Rural Generalist Program trainee information with the Victorian Rural Generalist Program (VRGP), to upload to the VRGP Client Relationship Management (CRM) system. See [VRGP CRM Privacy Statement](#) for further information.
- undertaking training, education and research;
- to track and monitor progress throughout participant's placement, which may identify their geographic location;
- de-identified aggregate data may be provided to the Department and to the Commonwealth Department for funding/receipt of grant purposes.
- 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; conducting the APS System; improving PMCV's website; and
- complying with obligations under any applicable laws.

Generally, PMCV collects personal information directly from individuals and their representatives as part of participants using the APS System unless it is unreasonable or impracticable to do so.

Participants

PMCV generally collects personal information directly from participants when they register or submit information on the APS System website or from other material provided by the participant, including their or curriculum vitae. Additional information such as Academic Transcript may be required and held outside of the APS System.

PMCV may coordinate centralised interview processes in support of recruitment processes conducted via the APS, Video interview recordings will be collected and held outside of the APS System.

PMCV may also collect personal information directly from participants through phone calls, emails, website forms or in person enquiries, including at careers expos and similar events attending by PMCV. Where a participant applies for special consideration, PMCV may collect sensitive information about that individual from that individual. This information is kept separately to the APS System. PMCV may also collect a participant's personal information from their referees. In some cases, PMCV collects a participant's personal information from public sources (for example national health practitioner register, internet) or through their memberships (for example peak bodies).

Referees

PMCV generally collects personal information about referees from participants who nominate those referees, then directly from referees (including through the Referee Assessment Form completed by referees).

Website visitors who are not registered participants:

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

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.

PMCV collects personal information about participants in order to operate the APS System and specifically to allow for applicants to be matched to available positions at health organisations in accordance with PMCV's algorithm.

The information collected is also used by PMCV to:

- communicate with participants, including providing confirmation of applications, notification of additional information required, confirmation of the information provided, reminders and allocation offers;
- maintain your personal information, our participant records and other registers;
- liaise with referees where needed;
- improve our services, in particular the APS System, through monitoring, quality improvement activities, audits, surveys and program evaluations;
- undertake training, education and research for the APS System;
- use de-identified information to model or forecast service; and
- report, monitor, evaluate, model or forecast in relation to workforce planning initiatives to other agencies within the Department of Health Victoria, or the Commonwealth Department of Health, and to any external contractors by the Department of Health Victoria to assist it in fulfilling its reporting obligations.

Referees:

PMCV collects personal information about referees for the primary purposes of verifying the participants experience and communicating with referee's regarding the Referee Assessment Form.

Website visitors who are not registered participants.

PMCV uses information regarding website visits for the purposes we collected it.

Others:

PMCV may also collect and use personal information from others for our operational, human resources, research, referral or other corporate activities in connection with the APS System.

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);
- Victorian Rural Generalist Program (VRGP) to upload Victorian Rural Generalist trainees data to the VRGP Client Relationship Management (CRM) system. See [VRGP CRM Privacy Statement](#) for further information.
- 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.

Referees

PMCV will provide relevant details of participants to referees in order to enable the referee to comment on the participant's experience.

Health organisations

While operating the APS System, relevant personal information is provided to health organisations, and others involved in these processes, including any providers of relevant intern training programs.

We disclose this information for the purpose of allowing those entities to:

- make selection and ranking decisions;
- communicate directly with participants who apply with their programs or positions, including requesting further information and providing employment contracts;
- undertake standard employment processes in relation to participants who apply for their programs or positions.

PMCV asks health organisations participating in the matching service to undertake to use the information provided only for selection purposes and not to disseminate any personal information to any other persons not involved in the selection process.

A health organisation may retain a candidate's Curriculum Vitae and Referee Assessment Forms if that candidate is matched to a position or accepts an unmatched position. Documentation submitted by candidates who were not matched or offered a post, will be destroyed after the finalisation of any appeals process in accordance with legislation requirements. Hospitals and health services will receive details of all candidates matched to all hospitals and health services participating in this process. This information may be used only to verify the status of candidates, and for no other purpose.

Regulators and audit bodies

PMCV may disclose personal information of participants or others to the Department of Health in accordance with our reporting obligations or to allow the Department to participate in the National Audit of Internship Acceptances ("National Audit"). PMCV may also disclose personal information directly to the Data Manager or others involved in the National Audit, so that they may perform their audit and other functions, including Late Vacancy Management Process.

PMCV (or other organisations) may disclose personal information to regulators or auditors of health organisations on a strictly confidential basis to enable the regulator or audit to satisfy itself that the matching was done lawfully and fairly.

Researchers and others

With the participant's consent, PMCV may share and disclose relevant information with other similar bodies both nationally and in other states and territories for the purposes of research and general information sharing in respect of data matching processes, intern arrangements, and other related purposes. PMCV will endeavour to ensure that such other bodies will receive and hold identifying information on a basis similar to that upon which PMCV holds and protects such information.

We may also disclose personal information to:

- State or Territory databases (where an applicant is not allocated to a position in Victoria), for the purpose of creating possible allocations to unfilled positions or casual vacancies that may arise from time to time;
- third party service providers;
- funders or regulatory authorities, accreditation authorities or other government departments; and
- professional advisers, and courts or tribunals where required by law.

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.

In relation to participants and referees, the APS Systems cannot be provided on an anonymous basis. If you do not provide the minimum required personal information, you will not be able to use the APS System. If you do not provide full and complete information, this may limit your prospects of being matched to a position.

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.

Method of Collection

PMCV is required by the *Privacy Act* to collect personal information only by lawful and fair means. If it is reasonable and practicable, we will collect personal information we require directly from you, including:

- by email;
- over the telephone;
- through written correspondences (e.g., letters, faxes);
- when you complete an application or purchase order whether on hard copy forms or otherwise (i.e., event registration forms, competition entry forms);

- in person during conversations between you and our representatives (e.g., job interviews, exams);
- through your access and use of website;
- at events such as courses, lectures, and workshops (e.g., survey forms);
- during assessments as part of our educational programs;
- electronic systems such as applications;
- through surveillance cameras in our building premises (which we use for security purposes);
- cookies (for more information); and
- from third parties, including but not limited to: educational providers that assist us in running our educational programs; government bodies, insurers in relation to professional indemnity insurance, public sources (e.g., telephone directories, membership lists of businesses, professional and trade associations, public websites, corporate business and government searches, bankrupt searches, searches of court registries).

PMCV also collects personal information in a number of ways, including:

- directly from you through various online and hard copy registration and application forms issued to facilitate the provision of services by PMCV and the APS System;
- from third parties, such as supervisors, peer reviews, referees, associated with your training or review; evaluation activities; and from any area of PMCV;
- via the PMCV website;
- via email and other electronic means, including credit card payment remittance slips;
- through online surveys where the member has not chosen to remain anonymous;
- from the Medical Board of Australia, Australian Medical Council 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));
- via social media; and by recording of some or part of the College examinations (access is restricted in accordance with relevant College policies)

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.

Website Security

While PMCV strives to protect the personal information and privacy of website users, we cannot guarantee the security of any information that you disclose online. You disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact PMCV.

You can also help to protect the privacy of your personal information by keeping passwords secret and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

Third Party Websites

Links to third party websites that are operated or controlled by PMCV are provided for your convenience. PMCV is not responsible for the privacy or security practices of those websites which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

Communication and Withdrawal of Consent

An individual may communicate consent or withdrawals of a previous consent to the PMCV use of their personal information such as direct marketing, in writing, verbally or electronically. PMCV will clearly identify when an individual is choosing to consent or withdraw consent to the use of their personal information.

Retention and Disposal of Personal Information

PMCV takes preserving and protecting a person's identity very seriously and it is a key responsibility and right of all our members, trainees, staff, customers and partners.

PMCV will take all reasonable steps to keep personal information secure from unauthorised use, loss, modification, and disclosure. PMCV employees are required to protect the privacy of personal information.

- we have a Privacy Officer to oversee the management of personal information in accordance with this policy and privacy legislation;
- we have a Data Handling Policy to ensure secure and complaint handling of personal information.

Complaints about breach of privacy

If you are concerned that PMCV may have handled your personal information inappropriately or 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 can 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 13330
Law Courts, Victoria, 8010

Location address:

Level 8,
533 Little Lonsdale Street
Melbourne, Victoria 3001
Telephone: +61 3 9670 1077
Email: pmcv@pmcv.com.au