



# PRIVACY POLICY

LAST REVISION: 26 AUGUST 2021

Western Australian General Practice Education and Training (WAGPET) recognises the importance of privacy and our obligations to those who share their private information with us in the delivery of and participation in Australian General Practice Training (AGPT) in WA.

This policy describes how WAGPET Ltd protects information in accordance with its obligations under the Privacy Act 1988 (Privacy Act) and the Australian Privacy Principles (APPs) while at the same time managing the AGPT in WA, ensuring safe quality training for GP registrars and safe quality care is being provided to the community.

Further information on the APPs can be found on the Office of the Australian Information Commissioner's website: <https://www.oaic.gov.au/>.

This policy describes:

- how and why we collect personal information,
- how your information is used,
- when and with whom we share information, and
- how you can access and amend your personal information.

## Personal information we collect

WAGPET will only collect personal information needed to administer and promote the programs we deliver.

This includes processing applications for the program, dealing with the ongoing management of doctors enrolled in the programs, conducting training in conjunction with our external training service providers and other regional training providers, managing the accreditation and reaccreditation of training facilities and GP supervisors, and providing information about our programs to prospective applicants (direct marketing).

Examples of personal and sensitive information we may collect includes your:

- name, residential and work telephone numbers,
- residential, work and email addresses,
- occupation,
- academic and employment history,
- family background, and
- financial records.

Examples of sensitive personal information we may collect include your:

- medical history,
- racial or ethnic origin, and
- indigenous affiliation.

## Personal information you give to us

We may collect your personal information directly from you when you enquire or apply for one of our training or placement programs or participate in our program as a service provider. We also collect your personal information during your engagement with us so that we can monitor and appraise performance and training or placement needs.

We also collect information to assist us to assess whether the program is meeting participant needs specifically, and the needs of participants generally. We will not collect sensitive personal information about you unless you consent, and the information is reasonably necessary for one or more of our functions or activities.

## Personal information we collect from other sources

We may collect personal information or sensitive information from a person or entity other than the individual. We will not collect this information for purposes outside the scope of the services that we are contracted to provide.

If we do collect your personal information from another source, we will take reasonable steps to ensure that you are made aware:

- that we collected your personal information from another source,
- what we will do with the information, and
- any other person or body to whom we may share or disclose the information.

We may collect sensitive personal information in accordance with the exceptions contained in APP 3.4 of the Privacy Act. For example, if the collection is required or authorised by or under an Australian law or by a court of tribunal order.

## What we do with your personal information

We use and disclose personal information to enable us to carry out our business of providing pre-vocational and vocational education, training and placement services for medical practitioners. We will use your personal information to:

- process and monitor applications,
- manage your training for the duration of the training period or placement,
- facilitate Department of Human Services (Medicare) and any incentive payments,
- report to the Department of Health (DOH) and other Commonwealth agencies, and the Australian College of Rural and Remote Medicine (ACRRM) and Royal Australian College of General Practitioners (RACGP) as necessary,
- conduct quality assurance and other program activities,
- undertake research, for example analysis of demand for medical services and distribution of doctors in our program, and
- promote and direct market programs to prospective applicants.

Sometimes we may use and disclose personal information for purposes that are related to the primary purpose. For example, to conduct surveys or undertake activities to assist us to improve our services and procedures.

We will not use your sensitive personal information for another purpose unless it is directly related to our functions and activities.

We may use or disclose personal information in accordance with the exceptions contained in APP 6.2 and APP 6.3 of the Privacy Act.

A link to the Federal Privacy Act is here: <https://www.oaic.gov.au/privacy/the-privacy-act>

## Organisations we may disclose to

Sometimes we need to disclose your personal information to persons or organisations outside WAGPET. You may reasonably expect that we may disclose your personal information to:

- referees that have been included in an application,
- training service providers who provide training or training support services to WAGPET including the Aboriginal Health Council of Western Australia (AHCWA), Australian Medical Association (AMA) WA, Rural Clinical School (RCS) of Western Australia, Rural Health West (RHW), Western Australian Country Health Services (WACHS), and Western Australian Primary Health Alliance (WAPHA),
- agencies involved with relevant official administration, monitoring, registration and verification activities such as the Australian Health Practitioner Regulation Agency (AHPRA), Department of Health, Department of Human Services (Medicare Australia), ACRRM and the RACGP,
- contractors or agents who provide services to us, for example, External Clinical Teaching Visitors (ECTV), Regional Advisory Committees, data management contractors and associated contractors, and marketing and promotional contractors,
- General Practice Supervisors Australia (GPSA), and
- General Practice Registrars Australia (GPRA).

## Can you request to deal with us without identifying yourself?

We understand that anonymity is an important element of privacy. In most cases, we need to know who you are to process and/or manage your application, training or enquiry. You can request to deal with us without identifying yourself or by using a pseudonym. However, in some instances this may not be possible, for example, when making a complaint, we may need to know your identity in order to investigate the complaint, in relation to a particular service provided by a training post.

If it is practicable to deal with us on an anonymous basis, we will take measures to ensure that information you provide on an anonymous or pseudonymous basis is not able to be linked with other information we may have about you. If you wish to deal with us on an anonymous or pseudonymous basis, contact the Privacy Officer.

## Do we send your personal information overseas?

It may be necessary for us to send your personal information overseas, for example to an overseas based data assessment or questionnaire assessment institution or firm with which we are collaborating in medical training assessment and research. We will not send the information outside Australia without your consent or unless the transfer complies with APP 8 (cross-border disclosure of personal information) or where we are obliged to do so under contract with the Department of Health.

## How we keep your personal information secure

WAGPET uses a range of physical and electronic security measures to protect personal information from misuse and loss, and from unauthorised access, modification or disclosure. For example, we restrict physical access to our offices, employ security containers, firewalls, secure databases, computer user identifiers and passwords.

Emails you send to us are screened by our email security systems and may be viewed by authorised WAGPET information technology personnel and subcontractors for security purposes.

## Automated information collection

When you visit the WAGPET website our server makes a record of that visit and logs the following information:

- your server address,
- the top-level domain name (for example .com, .gov, .au, .uk),
- the date and time of the visit to the site,
- the pages accessed and documents downloaded,
- the previous site visited, and
- the type of browser used.

The data listed above is collected to facilitate website and system administration, including monitoring to prevent security breaches and enhancement of the website to meet users' needs.

We do not attempt to identify users or their browsing activities except in the unlikely event of a criminal investigation, for example where a law enforcement agency has issued a warrant to inspect our server logs.

We do not use cookies when people make general visits to our website. Cookies are small text files that may be transferred to your computer's memory by the servers of some of the websites you visit. Their purpose is to track and store information about a visitor's usage of a website.

We do use cookies in relation to some of the specific web pages we have established for particular clients to allow them limited access to information via our intranet. These cookies are used only during a browsing session and expire when the visitor closes his or her browser.

WAGPET's website has links to other internet sites. Once you leave our website, the guidelines of this privacy policy no longer apply. Please read carefully the relevant privacy policies or terms and conditions governing these linked sites to ensure your privacy is protected.

## How to access your personal information

WAGPET will provide you with access to your personal information, subject to any applicable exceptions under the Privacy Act. We will first require you to verify your identity in a manner that is reasonable in the circumstances and specify the information you wish to access.

If we refuse your request, we will provide you with reasons for the refusal. For example, if we are not satisfied as to the identity of the requestor. You will not be charged for lodging a request to access your personal information.

Requests for access to personal information should, in the first instance, be directed to the Privacy Officer who will refer the request to an appropriate person within WAGPET.

## How to update your personal information

We will take all reasonable steps to ensure that your personal information is accurate, up to date, complete and relevant.

If you are able to establish that your personal information is inaccurate, out of date, incomplete, irrelevant, or misleading, we will take reasonable steps to amend the information.

If we update or amend personal information about you that we previously disclosed to another entity, and you request that we notify that entity, we will take reasonable steps to give that notification.

If we refuse your request to amend or update your personal information, we will give you a written notice setting out the reasons for the refusal, the mechanisms available to complain about the refusal, and any other matter prescribed by regulations. If you ask us to, we will associate the information with a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading in accordance with your request.

## How you can complain about WAGPET's privacy practises

If you have a concern about the way in which WAGPET handles your personal information and wish to make a complaint, contact the Privacy Officer.

Under the Privacy Act, the Privacy Commissioner has the power to investigate complaints or acts or practises that may be a breach of privacy even if there is no direct complaint to the Privacy Commissioner. If you have made a complaint to us about a WAGPET practice that you think amounts to an arbitrary or unreasonable interference with your privacy, and you do not believe that the matter has been resolved satisfactorily, you should either write to the Privacy Commissioner setting out the details of the practises which you think interfere with your privacy, or telephone the Privacy Hotline 1300 363 992 (local call charge).

If you wish, you are able to make a complaint directly to the Privacy Commissioner rather than to WAGPET. In most cases, however, it is likely that the Privacy Commissioner would refer you to WAGPET in the first instance to see if your complaint can be resolved without requiring the involvement of the Commissioner.

## Further information

To find out more about WAGPET's management of personal information, contact our Privacy Officer:

### The Chief Financial Officer

Western Australian General Practice Education and Training Ltd

Telephone: 08 9473 8200

Email: [privacyofficer@wagpet.com.au](mailto:privacyofficer@wagpet.com.au)

For more information on the Privacy Act and the APPs:

Visit the website the Office of the Australian Information Commissioner [www.oaic.gov.au](http://www.oaic.gov.au) or contact the Privacy Hotline 1300 363 992 (local call charge).

We will, from time to time, review and revise this Privacy Statement. We reserve the right to amend this policy at any time and any amendments will be notified by the posting of an updated version on our website at: <https://www.wagpet.com.au/resources>.

## Definitions

<b>Privacy Act 1988 (Privacy Act)</b>	Legislation which aims to safe guard and protect individual's personal and sensitive information: <a href="https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/">oaic.gov.au/agencies-and-organisations/app-guidelines/</a>
<b>Australian Privacy Principles (APPs)</b>	The 13 APPs replace the National Privacy Principles and are enacted legislation found in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth): <a href="https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/">oaic.gov.au/agencies-and-organisations/app-guidelines/</a>
<b>Personal Information</b>	Any 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. What constitutes personal information will vary, depending on whether an individual can be identified or is reasonably identifiable in the particular circumstances.
<b>Privacy Officer</b>	<p>The Chief Financial Officer is WAGPET's appointed Privacy Officer. The role of the Privacy Officer will include:</p> <ul style="list-style-type: none"><li>• participating in the development of initiatives that have a potential privacy impact</li><li>• providing advice on the general application of the Privacy Act 1988 (Privacy Act) to the agency's general operations</li><li>• handling, or supervising the handling, of privacy complaints and enquiries</li><li>• training staff in aspects of the Privacy Act that apply to their day-to-day activities</li><li>• being the primary privacy contact for the Office of the Australian Information Commissioner.</li></ul>
<b>Sensitive Information</b>	<p>Sensitive information is a subset of personal information and is defined as information or opinion (that is also personal information) about an individual's:</p> <ul style="list-style-type: none"><li>• Racial or ethnic origin</li><li>• Political opinions</li><li>• Membership of a political association</li><li>• Religious beliefs or affiliations</li><li>• Philosophical beliefs</li><li>• Membership of a professional or trade association</li><li>• Membership of a trade union</li><li>• Sexual preferences or practices; or</li><li>• Criminal record</li><li>• Health information about an individual</li><li>• Genetic information (that is not otherwise health information)</li><li>• Biometric information that is to be used for the purpose of automated biometric verification or biometric identification, and</li><li>• Biometric templates.</li></ul> <p>Sensitive information is generally afforded a higher level of privacy protection under the APPs than other personal information. This recognises that inappropriate handling of sensitive information can have particular ramifications for the individual concerned or those associated with the individual. For example, some kinds of sensitive information, such as information relating to race or ethnic origin, may provide the basis for discrimination or other forms of mistreatment. Mishandling of this information may also lead to humiliation or embarrassment or may undermine an individual's dignity.</p>