



Confidentiality and Privacy Policy of Active Locums Pty Ltd

@ 23.03.15

Including updates for *Privacy Amendment (Enhancing Privacy Protection) Act 2012*

Privacy Protocol of Active Locums Pty Ltd Information for Doctors

The staff at Active Locums Pty Ltd are aware of privacy issues and are committed to upholding the highest levels of privacy for your protection. The following information is a comprehensive outline of our privacy protocol.

The Australian Privacy Principles (APPs) have replaced the National Privacy Principles. Active Locums Pty Ltd have amended our current policy to incorporate and to become compliant with the new APPs numbers 1-13, under the new *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. For the latest version of these Acts, please see our links page or visit the ComLaw website: www.comlaw.gov.au.

Your personal information

Your personal information held by us may include your name, date of birth, current and previous addresses, telephone/mobile numbers, e-mail address, bank account and superannuation details, copies of your passport and driver's licence, AHPRA Medical Registration, Medical Defence Indemnity, criminal record/working with children record consent forms, declarations, clearance notifications and personal references and clinical skills appraisals. You are always welcome to make changes or update this information at any time. In order to supply you with work, Active Locums Pty Ltd may request to do frequent updates of this information so that your paperwork complies with legislative requirements.

Active Locums Pty Ltd accepts enquiries from individuals wishing to remain anonymous or who wish to use a pseudonym. However, due to the nature of our agency, it is not always possible for doctors to remain anonymous during the process of credentialling them for work. It is, however, possible to remain anonymous up to the point of making a genuine offer to a hospital or health facility. From the point onwards, if you choose not to disclose your personal information, we may not be able to provide you with the locum services you require, or the level of service on which we pride ourselves.

Active Locums Pty Ltd is committed to maintaining your privacy and we encourage you to contact us should you have any questions about the management of your personal information. We also encourage you to contact us if you believe your privacy has been breached in any manner so that we may manage it efficiently and appropriately.

How we collect personal information

Active Locums Pty Ltd will only collect sensitive information which is relevant to the credentialling process and which you consent to. Information about you will only be collected from you, unless you have consented verbally or in writing to the collection of your information from someone other than yourself.

How we collect personal information:

- Directly from you, when you provide information by phone, email, fax, SMS or post, or in documents such as an application form for locum work;
- From third parties such a Human Resources Department of hospitals or other organisations with your consent;
- From publicly available sources of information, such as AHPRA;
- From work you may have previously done for us.

The purpose of collecting your personal information:

- Applying for locum work;
- Undergoing NSW Health credentialling in application of a locum position;
- Obtaining clinical reference checks and feedback appraisals;
- Mailing lists for our communication only (these lists are not divulged to anyone).

Should Active Locums Pty Ltd receive unsolicited personal information, we would determine whether it is necessary for us to record, report, de-identify or discard it.

How we use your personal information

We use your personal information to:

- Provide you with locum work (for recruitment and employment purposes)
- Inform you of ways our service provided to you could be improved;
- Conduct and or verify appropriate National Criminal Record Checks and verify Office of the Children's Guardian Working With Children Checks and/or equivalent interstate offices;
- Research and obtain feedback from previous employers on your work performance;
- Undertake the process of auditing and for accreditation purposes with Global Mark
- Maintain business systems.

Who we may, with your permission, disclose your personal information to:

- Hospitals registered with NSW Health;
- Private Hospitals;
- Medical Practices;
- Relevant Health Services;
- Your representatives (e.g. your authorised representatives or legal adviser);
- Our professional advisers, including accountants and lawyers;
- Government and regulatory authorities and other organisations, as required or authorised by law;
- During the process of auditing/accreditation purposes to auditors of Global Mark.

Active Locums Pty Ltd will not disclose your personal information to anyone without your permission unless it is required by law. We are an Australian Organisation that deals with locum doctor work within Australia, so it would be highly unlikely that there would be a situation requiring us to disclose your information to overseas recipients unless you are an overseas trained

doctor who has given Active Locums Pty Ltd written consent to acquire information from overseas.

Once you register with Active Locums Pty Ltd you will be placed on our daily mailing list. This allows you access to the hospital vacancies we have advertised. You may choose to no longer receive our newsletters at any time by replying to our email with a request to unsubscribe.

Accessing your personal information

You have a right to access your personal information, subject to some exceptions allowed by law. If you would like to do so, please let us know. You will be required to put your request in writing for security purposes. Your personal information will only be released to you directly, unless you grant authority for your information to be released to a third party.

Ensuring accuracy of your personal information

Active Locums Pty Ltd takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. That's why we recommend that you:

- Let us know if there are any errors in your personal information;
- Keep us up-to-date with changes to personal information, such as name, address, contact telephone numbers, banking and superannuation details, ABN and/or company details;
- Report certain criminal conduct and disciplinary matters – a doctor who is charged with having committed, or is convicted of, a serious sex or violence offence must, within 7 days of the charge being laid or conviction, report that fact in writing to the chief executive of the relevant organisation/Active Locums Pty Ltd.

How we manage the security of your personal information

We keep hard copy and scanned electronic records. These paper records are kept in a secured environment under lock and key and electronic filing is password-protected and accessible only by our office staff who are trained to handle sensitive information. All our staff have voluntarily signed a declaration that they will not disclose any information encountered in the course of their work and will uphold the Australian Privacy Principles. All information is backed-up in an encrypted state using enterprise grade software to secure storage. Any out of date files are shredded on site using a mobile document shredding company in the presence of the company director.

Website privacy

Our web site privacy policy deals only with personal information collected by the site or with privacy issues relating to this site. Personal information is collected from our web site and electronically stored when you register your requirements or when you respond to any advertised position or practice. In each case, your name, email address and contact phone number is collected and stored electronically and on paper records kept in a secure locked environment.

Active Locums Pty Ltd undertakes not to give personal information to any third parties, excepting where we are required to do so by law (or for the purpose of law enforcement) or where a threat exists to safety or health, unless it is for the purpose of obtaining work. We endeavour to ensure that all personal information held on the servers of the host of our web site is not, to the best of our knowledge, capable of being accessed by unauthorised persons, altered or lost. However, we cannot be held liable for information which has been accessed beyond our control or authority or through dishonest means.

At any time, you have the right to enquire as to your personal information that is being held or you

may wish to correct any personal information that is being held. Should you require any information you should contact the office.

You should note that by using the site, registering your requirements on the site or requesting further information on a particular position, you are consenting to the collection and storage and use of your personal information. We give you our assurance that we will endeavour to handle your information in a sensitive manner in accordance with Australian Privacy Principles.

Special circumstances

In special circumstances, for example if we sell our business or a substantial part of our business, your information may be transferred as part of that sale. We will not use your information for purposes unrelated to the services we provide, unless we first obtain your consent.

Contact us

Should you feel your privacy has been breached and you would like to make a complaint please do not hesitate to let us know. If you wish to contact us to dispute, correct or query any information held on file, please contact Active Locums Pty Ltd:

Active Locums Pty Ltd
PO BOX 276
Double Bay
NSW 1360

Email: judith@activelocums.com.au
Phone: (02) 9327 7555
Mobile: 0433 004 560
Fax: (02) 9327 1855

If you have made a complaint about a breach of privacy which has not been resolved to your satisfaction, you can make a complaint to the Office of the Australian Information Commissioner on 1300 363 992 or via other means available on their website: www.oaic.gov.au.