



Privacy Policy

NZCPHM Policy and Procedures

Purpose

The purpose of this policy is to ensure that the procedures around the College's collection, storage and treatment of personal information on Fellows, Registrars, Associate Members, and staff complies with the Privacy Act 2020 (as at 1 December 2020).

Scope

This policy is to be adhered to by College Officers, contractors and staff when collecting, processing or storing personal information on Fellows, Registrars, Associate Members, and staff.

Definitions

Associate Member – a financial member of the College designated as an Associate Member

Fellow – a financial member of the College designated as a Fellow

Health Workforce (HW) – refers to the organisation which provides support and funding for training programme members

Medical Council of New Zealand (MCNZ) – refers to the organisation which oversees the competency of New Zealand doctors and maintains the register of their vocational scope

Necessary time – the time during which information is required to be kept and used for the purposes of administering training, Fellowship and membership of the College including maintenance of educational records in perpetuity

Personal information - information about an identifiable individual, e.g. full name, date of birth, ethnicity, work history, educational records, Continuing Professional Development (CPD) records, Curriculum Vitae (CVs), etc.

Registrar – a doctor currently enrolled in the Public Health Medicine training programme

Staff – a person employed by the College

Purpose of collection of personal information (Information privacy principle 1)

The College must collect and store personal information from its members in order to carry out services for the members and the business of the College. This includes, but is not limited to, information such as:

- Full name
- Date of birth
- Gender
- Ethnicity
- Address, email and telephone numbers (private and work)
- Fellowship information
- Continuing Professional Development participation
- Applicant CVs

For College staff, this includes job application details and CVs as well as address and emergency contact information, and Human Resources (HR) records.

Collection of information (Information privacy principles 2, 3 and 4)

Personal information is provided to the College by the individual themselves when applying to the training programme or to become an Associate Member or Fellow. Individuals are advised at the time they provide the information, by means of a paragraph on the application form, what the information will be used for and that they can request to view or correct the information at any time. Only information necessary to carry out the business of the College, including training and membership, is collected.

Storage and security of information (Information privacy principle 5)

Personal information for Registrars, Fellows and Associate Members is stored on the College's secure database which requires passwords for access by College staff.

Documentation is stored in the 'cloud' using SharePoint which has robust security protocols.

Access to and correction of information (Information privacy principles 6 and 7)

College staff are able to access the personal information of members on the database or in the College SharePoint records system, using their secure log-ins. Where necessary, relevant information is shared with College committees for the purpose of decision-making regarding acceptance to the training programme, career progression and conferring Fellowship. Individuals can access and update/edit some of their own information, e.g. contact details, via the Members' Section of the College website. Should an individual make an application under Information Privacy Principle 6, the College must respond to the request, as soon as reasonably practicable, and in any case not later than 20 working days after the day on which the request is received.

Retention of information (Information privacy principle 9)

The College will not hold information on any one individual for longer than is necessary. Information held electronically will be permanently deleted and written/hard copy information will be destroyed in a secure manner.

- Training Programme, Associate member and Fellowship application materials (unsuccessful applicants) – destroyed after selection process completed.
- Training Programme application materials (successful applicants) – kept until the training programme is complete and Fellowship is granted, or until seven years have elapsed since the registrar exited the training programme.
- Associate member and Fellowship application materials (successful applicants) – kept for the lifetime of the member, including extending beyond membership duration.
- International medical graduate vocational assessments – kept until the applicant has achieved vocational registration, or until two years have elapsed from unsuccessful application.
- Application materials for College staff (unsuccessful applicants) – destroyed after the successful applicant commences the role.
- College staff HR records (including application materials for successful applicants) – kept for the duration of employment and then seven years following the cessation of employment. After these seven years information is destroyed in a secure manner.

Training and Fellowship records are held as a permanent record for the lifetime of the member as the College may be requested to provide this information even after a member has resigned. This includes:

- Training Programme records
- Membership records
- Continuing Professional Development participation records

Sharing of information (Information privacy principles 10 and 11)

It may be necessary for the College to share some identifiable information with the MCNZ in relation to a registrar's status on the training programme, for the purpose of recording Fellowship or regarding a Fellow's participation in Continuing Professional Development. This information will include only name, Fellowship status and number (where relevant), and participation in and compliance with training programme or Continuing Professional Development requirements.

Relevant registrar personal information may be shared with Health Workforce for the purpose of funding allocation. This information would include only name and status or progress on the training programme.

Notifiable Privacy Breaches (Privacy Act Part 6, Subpart 1)

A Notifiable privacy breach is one where it is reasonable to believe has caused serious harm to an affected individual or is likely to do so, per Part 6, clauses 112 and 113 of the Privacy Act 2020.

Should any breach of the Privacy Act occur, the College must notify the Privacy Commissioner as soon as practicable after becoming aware of the privacy breach. The College must also notify the affected individual as soon as practicable after becoming aware of the privacy breach.

Associated policies and standard operating procedures

- NZCPHM Constitution 2019 (Rules 14-16)
- Pathways to Fellowship Policy
- Selection of Registrars Policy
- NZCPHM Training Manual
- NZCPHM TOPS Manual

Implemented: 18 August 2020

Last Reviewed: 16 March 2020

Due for review: 10 November 2025