

<b>Policy name:</b>	<b>Confidentiality and Data Management</b>
<b>Subject:</b>	<b>Ensuring confidentiality and data storage and security relating to accreditation reviews</b>
<b>Date approved:</b>	<b>13 May 2015</b>
<b>Date of review:</b>	<b>May 2019</b>
<b>Responsible Officer</b>	<b>Chair, Accreditation Subcommittee and Secretariat of the Accreditation Subcommittee</b>

### **Policy Statement**

Postgraduate Medical Education Council of Tasmania (PMCT) in the role as an accreditation body gathers information about health services that are undergoing the accreditation process.

In undertaking this task, PMCT acknowledges the importance of confidentiality related to the information and data gained during the accreditation survey and overall process.

Confidential information is deemed to be any non-public information pertaining to the health services undergoing the accreditation process. Confidential information is information which has been disclosed to the survey team and Accreditation Subcommittee members in the course of the accreditation survey or in the normal course of their work for PMCT.

This policy is reviewed every four years, or more frequently, if deemed necessary by the Accreditation Subcommittee.

### **Confidentiality process:**

To ensure confidentiality of information and data is maintained in the accreditation survey visit it is mandatory that matters concerning accreditation outcomes and deliberations will only be discussed with the relevant health service staff concerned and Accreditation Subcommittee members as deemed relevant by the Chair. Team members should also treat all information provided by other team members during the review process as confidential.

All survey team members must complete a *Confidentiality Agreement* each year they participate in an accreditation review. This agreement must be completed and provided to the Secretariat prior to a Survey Visit. These confidentiality agreements are logged into the PMCT system and noted at the next PMCT Accreditation Subcommittee meeting. Failure to do this would exclude that survey team member from undertaking a survey visit.

PMCT's confidentiality agreement ensures survey team members and Accreditation Subcommittee members confirm the following:

- A member of a survey team will not disclose any information gained from participation as a surveyor which is identified as being confidential, by a health service representative or surveyor, at the time of the visit or in other circumstances before or after the visit, except in the course of the accreditation survey process.
- When acting as surveyor, a member will not discuss the recommendations of a survey visit outside of the visit nor will they discuss the behaviours of staff as observed during the visit, unless it is in the course of the accreditation survey process.
- A member of a survey team will not disclose any information either directly or indirectly, the contents of any survey team reports, associated material or data without prior written authorisation from the Chair of the Accreditation Subcommittee of PMCT.
- A member of the Accreditation Subcommittee and the Secretariat for the Subcommittee acknowledges accreditation information as confidential; including information provided by the health service, documents relating to any previous survey visit and any subsequent

report/s, and the information will be used for the sole purpose of fulfilling their role as of a member of the Accreditation Subcommittee or the Secretariat for the Accreditation Subcommittee.

### **Data Storage and Security**

In accordance with the National Privacy Principles (NPP) Data Security Principle, PMCT is committed to taking reasonable steps to protect the health services' accreditation information from misuse and loss and from unauthorised access, modification or disclosure.

The NPP4 also states an organisation must take reasonable steps to ensure that data and information is destroyed or permanently de-identified if it is no longer required for the primary purpose for which it may be used or disclosed.

After the survey period, all information and documents are kept in a secure storage area in the offices of PMCT, Hobart. Secure containers are provided for paper-based information. Computer and network security systems are in place to protect information and data from unauthorised access and/or modification. The hard copy files are maintained in a secure storage system for seven years.

PMCT destroys paper based information and documents related to accredited health services seven years after the survey period. PMCT maintains a destruction file to monitor the documents. Paper based information is electronically scanned prior to secure shredding and stored on a data backup hard drive.

### **References**

Australian Government, Office of the Australia Information Commissioner, March 2014  
<http://www.oaic.gov.au/privacy/privacy-resources/privacy-guides/app-quick-reference-tool>

<http://www.oaic.gov.au/privacy/privacy-resources/privacy-guides/australian-privacy-principles-and-national-privacy-principles-comparison-guide>