

<b>Policy name:</b>	<b>PMCT Accreditation Policy – Confidentiality and Data Management</b>
<b>Subject:</b>	Ensuring confidentiality, data storage and security relating to accreditation reviews
<b>Date of last approval:</b>	14 February 2023
<b>Date due for review:</b>	February 2027
<b>Policy Revision Number</b>	Version 2.3
<b>Responsible Officer</b>	Chair, Accreditation Committee and Manager, Accreditation Committee

## Policy Statement

In its role as an accreditation body, the Postgraduate Medical Education Council of Tasmania (PMCT) 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 obtained 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 Committee 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 PMCT Accreditation Committee.

## Context

The PMCT accreditation process has been designed to review, monitor and evaluate the provision of intern training by health services. The performance is measured against specific standards and criteria, with the ultimate aim of achieving the following objectives:

1. That Interns achieve a high standard of general clinical education and training; and
2. The best possible environment is provided for the organisation, supervision, education and training of Interns.

The objective of the accreditation process is to ensure that the training health service complies with the following seven standards:

1. Health service culture and support for interns;
2. Orientation;
3. Education and training program;
4. Supervision;
5. Feedback and assessment;
6. Program evaluation; and
7. Facilities and amenities

## Confidentiality Process

To ensure the confidentiality of information and data obtained during an accreditation survey visit is maintained, it is mandatory that matters concerning accreditation outcomes and deliberations will only be discussed with the relevant health service staff concerned and PMCT Accreditation Committee (PMCT AC) members as deemed relevant by the Chair. Team members should also treat all information provided by other team members prior to, during or after the review process as confidential.

All survey team members must complete a [PMCT Confidentiality Agreement](#) each year they participate in an accreditation review. This agreement must be completed and provided to the Manager prior to a Survey Visit. These confidentiality agreements are logged into the PMCT system. Failure to do this will exclude a survey team member from undertaking a survey visit.

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

Survey team members:

- 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 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, including but not limited to the contents of any survey team reports, associated material or data without prior written authorisation from the Chair of the Accreditation Committee of PMCT.

PMCT Accreditation Committee:

- Members of the Accreditation Committee and the Chair for the Committee acknowledges accreditation information as confidential (including information provided by the health service, documents relating to terms, and any survey visits and associated report/s), and that the information will be used for the sole purpose of fulfilling their role as a member of the Accreditation Committee or the Chair for the Accreditation Committee.
- Any items discussed at quarterly and exceptional meetings of the PMCT AC must at all times be considered confidential and not disclosed to any other people not related to the PMCT AC.

## 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 NPPs 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.

All information and documents, including those from a survey visit, are maintained in a secure cloud storage system with restricted access to relevant personnel, which is maintained for seven years as per the specified guidelines. Secure containers are provided for paper-based information and a confidential shredding service is employed for document destruction. PMCT recommends no paper-based records are to be kept and have moved to secure cloud based processes for enhanced document security. Computer and network security systems are in place to protect information and data from unauthorised access and/or modification.

## REFERENCES

Australian Government, Office of the Australia Information Commissioner

<https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference>

## Document History

<b>Date effective</b>	<b>Author/Editor</b>	<b>Approved by</b>	<b>Version</b>	<b>Change Reference Information</b>
13 May 2015	PMCT Accreditation Manager	PMCT Accreditation Committee	1.0	Original document
15 February 2021	PMCT Accreditation Manager	PMCT Accreditation Committee	2.1	Minor changes to links
23 August 2022	PMCT Accreditation Manager	PMCT Accreditation Committee	2.2	Minor changes
14 February 2023	PMCT Accreditation Manager	PMCT Accreditation Committee	2.3	Minor changes