



## Policy on the collection and handling of personal information

Approved date 9 August 2017

Date for review August 2020

## **Introduction**

This policy describes how the Veterinary Council of New Zealand collects and handles personal information in compliance with our powers and responsibilities under the Veterinarians Act 2005 and the Privacy Act 1993.

Privacy and confidentiality principles apply to all personal information we hold.

## **Purpose of collection**

We collect personal information so that we can carry out Council's functions under the Veterinarians Act 2005. Our role is to protect the public interest by ensuring that vets are fit and competent to practise.

We collect personal information so we can:

- keep and maintain the register of veterinarians
- process applications for registration and annual practising certificates
- monitor and audit compliance with minimum standards including compliance with continuing professional development requirements
- carry out its investigative and disciplinary functions, including receiving and considering complaints about registered veterinarians
- investigate and take action where there are concerns about veterinarians' health or competence
- investigate offences and bring prosecutions under the Veterinarians Act 2005.

We also collect and use information in summary form in order to:

- set and implement minimum standards for veterinary practice
- promote high standards of veterinary education and conduct
- advise and make recommendations to the Minister for Primary Industries and Massey University on relevant veterinary issues.

## **Privacy Act principles**

In line with the Privacy Act, we will:

- only collect personal information that we need in order to carry out our functions under the Veterinarians Act
- collect your personal information directly from you unless one of the exceptions set out in the Privacy Act applies
- take reasonable steps to make sure you are aware that we are collecting information, what we will use it for and who it will be disclosed to unless one of the exceptions set out in the Privacy Act applies
- not collect personal information by unlawful means or in a way that is unfair or would intrude unreasonably on your personal affairs
- keep the personal information that we hold secure
- give you access to any of your personal information that we hold unless one of the exceptions set out in the Privacy Act applies
- allow you to request a correction of any of your personal information that we hold and record that you have requested a correction
- take reasonable steps to ensure the personal information we hold is correct
- only store personal information for as long as is necessary for us to carry out our functions

- only use your information for the reasons that you gave it to us unless one of the exceptions set out in the Privacy Act applies
- not disclose your personal information to anyone else unless doing so is necessary for us to carry out our functions or where one of the exceptions set out in the Privacy Act applies

On request we will give you a copy of your personal information unless there is a compelling reason why we can't (e.g. if a complaint is being investigated, we may not be able to provide all the information until the case closes).

If you request a copy of your information, a charge may apply to cover our costs.

To request a copy of your personal information, or request that it be corrected, write to:

The Privacy Officer  
Veterinary Council of New Zealand  
PO Box 10 563  
Wellington 6143

Or email [vet@vetcouncil.org.nz](mailto:vet@vetcouncil.org.nz) with "Privacy Act Request" in the subject line.

### **Confidentiality**

We sometimes collect and store information that is confidential in nature (e.g. details of veterinary services provided by a vet to their client). Where the confidential information is not subject to the Privacy Act (e.g. information about a business rather than an individual or information which is commercially sensitive but does not contain any personal information), we will only use and disclose that information where doing so is necessary to carry out our functions under the Veterinarians Act or where disclosure is required by law.

### **Information for vets**

#### ***The register of veterinarians***

The Veterinarians Act requires us to maintain a register of veterinarians.

The Register can be viewed and searched on our website.

There is some information that we must make available to the public. This includes your name, registration status, and qualifications.

Vets need to give their contact details to us, but we do not make these publically available.

#### ***Unique Identifier***

To enable us to carry out our statutory functions efficiently every veterinarian is assigned a unique identifier (registration number) at the point of registration. A vet's registration number is not public information and is not normally disclosed to outside parties.

### ***The workforce survey***

We collect statistical information in order to report on workforce trends. This information may be used to assist in workforce planning. Summary information is analysed. Individuals are not identifiable in the final publication.

### ***Records relating to complaints or notifications***

We keep a record of written complaints and notifications received about a vet. The purpose of retaining these records is:

- for recording purposes, to demonstrate that matters have been addressed by the relevant Council committee, and the outcome that was reached
- in case a pattern of conduct or performance emerges, if similar notifications are received in future.

We may review previous case files in the event of a new notification or complaint. In doing so, we will assess whether the information is accurate and relevant before taking it into account. Previous complaints or notifications may be particularly relevant where there are questions about a vet's competence because a lack of competence is often demonstrated by a pattern of poor standards, care or performance.

Vets will be notified of complaint and notification outcomes, and may wish to comment. Any comments are kept on file.

### ***Sharing your personal information***

We will protect your personal information and only share it when we need to do so to carry out our work.

Sometimes we need to provide information about the health, competence or conduct of a vet to a third party (e.g. an expert whose advice is being sought). Anyone we contract to carry out work for us is asked to sign a non-disclosure agreement.

If we have to send personal, private or sensitive information electronically, we take reasonable precautions to prevent unauthorised access.

### ***Other regulators***

We will supply a Letter of Standing if you request one and pay the prescribed fee.

If you are currently subject to any formal complaint, competence or health proceedings this will be noted in the letter, together with any conditions on practice, suspensions or proven disciplinary charges (see *Publicly available information* below).

### ***Publicly available information***

The following information is publicly available:

- Information on the Register of Veterinarians
- Conditions on practice imposed under section 61 of the Veterinarians Act
- Suspensions
- Outcome of judicial committee hearings when there charges are upheld, and there is no name suppression.

The following information is not publicly available:

- Address, phone, email or practice details of a vet unless they give us consent to publish these on the register
- Complaints (past and current, including informal notifications) except where Judicial Committee charges were upheld and there was no name suppression
- Information relating to individual competence and health assessment processes (but we will publish details of any conditions on practice or suspension from practice).

The Council will not disclose any personal information that is not publically available unless you have given us permission or we consider that doing so is both in the public interest and permissible under the Privacy Act, the Veterinarians Act or any other New Zealand law.

### **Information for website users**

This information applies to information collected through the VCNZ website [www.vetcouncil.org.nz](http://www.vetcouncil.org.nz)

We collect some information when you visit. This includes:

- IP address
- Search terms
- Pages viewed and links clicked on
- Date and time of website visit
- Whether the site was visited after using a search engine or a link from another site
- What device you used to view the site.

This information may be used to create summary reports that help us improve our website.

Some pages may contain links to other organisations' websites. These websites are independent of VCNZ. We aren't responsible for their content or privacy policies.

### **Information for members of the public who raise a concern or complaint with us**

If you want to formally raise concerns you have about a vet, we will need some personal information from you. Privacy and confidentiality principles will be applied however some information will need to be disclosed to the person complained about so that they can fairly respond to the complaint.

We can't generally address concerns that were raised anonymously. We will normally need to give your name and a copy of your comments to the vet concerned. For more information about this, or if you have concerns, please contact us.

We won't give the vet your contact details or any personal information that isn't relevant.

We will keep your personal information while your concern or complaint is being dealt with and we may keep some of your personal information after that time for our records.

## **Retention and disposal of information about people on the register**

We keep the following information about people who have been registered for a period of 70 years or for the lifetime of the person concerned (whichever is shorter), including after a request for removal from the register:

- Registration application documentation
- Any significant correspondence between us and the person
- Records of any disciplinary action taken
- Information about any complaints or concerns that were considered by a Complaints Assessment Committee
- Information about any concerns that were considered by the Notification Review Group
- Information about any proceedings before the Judicial Committee
- Information about any serious competence concerns that come to our attention
- Information about any serious health concerns that come to our attention
- Details of any action taken by us under sections 57 or 60 of the Veterinarians Act as a result of a competence or health assessment
- Details of any voluntary undertaking or other informal measure taken in response to concerns about health or competence
- Details of any conviction that meets the criteria set out in section 50 of the Veterinarians Act

This privacy policy also applies to personal information held about members of Council and its committees, staff members, and other parties who do work for Council. Privacy and confidentiality principles as outlined in this policy apply to all personal information.

## **Contact us**

If you have any concerns about privacy, you can contact us:

The Privacy Officer  
Veterinary Council of New Zealand  
PO Box 10 563  
Wellington 6143

Or email [vet@vetcouncil.org.nz](mailto:vet@vetcouncil.org.nz) with "Privacy" in the subject line.