

OFFICIAL



# PRIVACY POLICY

VETERINARY PRACTITIONERS REGISTRATION BOARD OF  
VICTORIA

OFFICIAL



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## 1. ABOUT THIS POLICY

The Veterinary Practitioners Registration Board of Victoria (the VPRBV) may collect, hold, use and disclose personal and/or sensitive information to carry out its functions under the [Veterinary Practice Act 1997](#) (“the VP Act”).

This Privacy Policy sets out how the VPRBV manages the personal and/or sensitive information obtained when carrying out its functions. Any reference to “our” or “we” in this policy is a reference to the VPRBV.

The VPRBV must comply with the *Privacy and Data Protection Act 2014* <https://www.legislation.vic.gov.au/in-force/acts/privacy-and-data-protection-act-2014/031> (“the Privacy Act”) and is bound by the Information Privacy Principles <https://ovic.vic.gov.au/privacy/for-agencies/information-privacy-principles> (the IPPs) in the Privacy Act. The IPPs set the standards for how Victorian public sector organisations should collect, store, protect, use, disclose and correct your personal information.

As well as our obligations under the Privacy Act, we also have a duty of confidentiality under section 77 of the *Veterinary Practice Act 1997* (“the VP Act”).

We are committed to responsible and fair handling of personal information consistent with the IPPs in the Privacy Act and s77 of the VP Act.

This policy applies to all functions we perform. Any personal information that we collect or obtain about an individual from other sources will be handled in accordance with this policy. It covers all contact with us, whether in person, by telephone, email or online.

This policy also explains how persons can access and correct personal and/or sensitive information that we hold about them and how to make a complaint about a privacy matter.

### DEFINITIONS OF TERMS USED IN THIS POLICY

**Personal information** is defined by the Privacy Act, and for the purpose of this policy means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- whether the information or opinion is true or not, and
- whether the information or opinion is recorded in a material form or not.

**Sensitive information** is a subset of personal information. Sensitive information includes information or an opinion about an individual’s health, racial or ethnic origin, political opinions, association memberships, religious or philosophical beliefs, sexual orientations, criminal history, genetic and biometric information.

**Personal health information** is not covered by the Privacy Act or this policy. Any health records we handle are protected and managed in accordance with the *Health Records Act 2001* (<https://www.legislation.vic.gov.au/in-force/acts/health-records-act-2001/049>).

**Unique identifier** is a registration number we create by for registering a veterinary practitioner. This is a publicly available identifier, e.g. V6777.

## 2. COLLECTION OF PERSONAL INFORMATION

### WHY WE COLLECT INFORMATION

The Veterinary Practitioners Registration Board of Victoria (“the VPRBV”) is a statutory body/Victorian public sector organisation established by the *Veterinary Practice Act 1997* (“the VP Act”).

The VPRBV’s role is to administer the VP Act, which provides for the registration of veterinarians (veterinary practitioners) and the regulation of their professional conduct.

We collect, hold, use and disclose personal information and/or sensitive information so that we can carry out our regulatory functions under the VP Act. These functions may include but are not limited to:

- registration functions including receiving and determining registration applications (including renewal applications) and maintaining a Register of Veterinary Practitioners
- compliance functions, including receiving complaints, conducting investigations and undertaking disciplinary proceedings and/or initiating prosecutions that may result from those investigations
- receiving or processing enquiries, including requests for access to information and applications made under the Freedom of Information Act 1982 (Victoria).
- providing updates to veterinary practitioners, animal owners, the public and other stakeholders and collecting responses to surveys and consultations
- managing VPRBV employees, contractors and service providers.

### HOW WE COLLECT INFORMATION

We aim only to collect information which is reasonably necessary for, or directly related to, the official function or activity being carried out.

Collection of personal and sensitive information is managed in accordance with any requirements set out by the legislation under which it was collected, including the Privacy Act and the VP Act.

The main way we collect your personal and/or sensitive information is when you give it to us. For example, we collect your information when you:

- write to us, email us or telephone us
- submit a form (an enquiry form, a registration application or a complaint form)
- pay for a service, e.g. registration fees
- update your details via the VPRBV website
- participate in community consultations, forums, surveys or meetings led by us
- seek employment with us, are employed or volunteer with us, or are contracted to provide services to us
- are a VPRBV board or committee member
- make a Freedom of Information (FOI) request
- visit our website (using automated data collection software and systems).

### OPTION TO REMAIN ANONYMOUS WHERE POSSIBLE

Where possible, you have the option of remaining anonymous or using a pseudonym (a made-up name) when you interact with us. However, you will need to identify yourself in situations where:

- we are authorised or required by law to deal with an identified individual, or
- it is not practical to interact with you if you have not identified yourself, e.g. we require your name and basic contact information to follow-up with you on an enquiry.

If you need to identify yourself, we will explain why, and what it would mean for you if we did not collect the identifying information.

## **COLLECTION OF SENSITIVE INFORMATION**

We will not collect your sensitive information unless it is reasonably necessary and directly related to the official function being carried out, and you consent to the collection of that information.

However, we may collect sensitive information without your consent if:

- required or authorised to do so by an Australian law or a court or tribunal order, or
- it is necessary to reduce or prevent a serious threat to the life, health or safety of the public or animals, or a serious threat to public health or safety.

## **COLLECTION OF INFORMATION FROM A THIRD PARTY OR OTHER SOURCE**

We will generally seek to collect personal information directly from you, unless it is impractical to do so or you consent to us collecting information from another party.

We may collect personal information from publicly available sources, such as the websites of social networking services or business websites, to enable us to perform our functions effectively.

Sometimes we may collect personal and/or sensitive information from a third party. For example:

- if an enquiry or complaint is made to us concerning a veterinary practitioner, we record this information and related details
- information about a veterinary practitioner from another Australian or an international veterinary board
- information about a veterinary practitioner from other Australian Commonwealth, State and Territory government bodies or organisations, in certain circumstances.

We may also receive unsolicited personal and/or sensitive information from a third party, i.e. we did not ask them to provide the information. If we receive unsolicited personal and/or sensitive information from a third party, we must determine if we could have collected it by lawful and fair means. If we decide we could not have collected it by lawful and fair means, we will destroy the information.

## **HOW WE NOTIFY YOU ABOUT COLLECTION OF YOUR INFORMATION**

When we need to collect personal information about you, we will take all reasonable steps to notify you about:

- who we are and how you can contact us
- the purpose(s) for which we are collecting the personal information
- the circumstances in which we may have collected it if not collected directly from you, or if you may be unaware that we have collected your personal information
- any laws requiring us to collect this personal information, or if its collection is authorised or required by a court or tribunal order
- how you may be affected if we are unable to collect all or some of the requested personal information
- the details of any agencies or the types of agencies to which we normally disclose the type of personal information to and if those recipients are outside Australia
- our Privacy Policy, including information on how you can access or correct your personal information and how complaints about the handling of your personal and/or sensitive information can be made and will be managed.

In some circumstances it may not be practical to notify you about the collection of personal information, e.g. when we receive information from a third party.

## 3. USE AND DISCLOSURE OF INFORMATION

### USE OF INFORMATION TO CARRY OUT OUR FUNCTIONS

The VPRBV uses, and may disclose, the personal and/or sensitive information it collects or otherwise obtains to carry out its functions under the VP Act.

Use and disclosure of personal and sensitive information is managed in accordance with any requirements set out by the legislation under which it was collected, including the Privacy Act and the VP Act.

For those seeking registration-related services, including letters of professional standing for other registration authorities, we will use the personal and/or sensitive information collected during that process to provide registration or the relevant service.

For those who contact us with a query or complaint, we may use any personal and/or sensitive information collected in that process to contact them, to assess the information provided, investigate the conduct of veterinary practitioners, assess future reports of misconduct, monitor or assess compliance, and/or take enforcement action.

### The Register of Veterinary Practitioners

Under the VP Act, the VPRBV is required to keep a register of all veterinary practitioners who hold registration with us. Section 16 of the VP Act sets out the information which must be included on the Register of Veterinary Practitioners (the Register), as well as the information that must be publicly available.

Your personal and/or sensitive information may be used to manage and update the Register and the Search for a Vet (<https://www.vetboard.vic.gov.au/VPRBV/VetSearch.aspx>) function on our website (an electronic extract of key information on the Register).

Members of the public can use the Search for a Vet function on our website, may visit the Board's offices to view the full Register and/or can purchase a full copy of the Register and/or extracts of the Register.

### USE AND/OR DISCLOSURE OF INFORMATION FOR SECONDARY PURPOSES

We may use your personal information to distribute our newsletters or provide organisational or industry updates.

We may use de-identified information for analysis and reporting purposes.

We may use your personal information for law enforcement or other purposes required by law.

With some exceptions, we will first obtain your consent to use or disclose your personal and/or sensitive information for a secondary purpose. Examples of exceptions include if the use or disclosure of your personal information:

- related to the original purpose for which it was collected would be reasonably expected by you. For example: disclosure in correspondence to another veterinary board if it enabled us to respond to an enquiry more effectively.
- is reasonably believed to be necessary to prevent or lessen a serious threat to the life, health or safety of any individual, or to public health or safety
- is necessary for us to take appropriate action where we have reason to suspect unlawful activity or misconduct of a serious nature which relates to our functions
- is legally required or authorised by a law, or a court of tribunal order
- is reasonably necessary for law enforcement related activities, such as the prevention, detection, investigations, prosecution or punishment of criminal offences or breaches of the law, intelligence gathering, surveillance, or conduct of protective or custodial services
- is authorised by the head of a Australian Government Intelligence Agency and is certified to be necessary for the performance of that agency's functions

- is reasonably believed necessary to help locate a person who has been reported as missing.

Under the VPRBV's duty of confidentiality in the VP Act, we may only disclose information to another person for purposes or in circumstances set out in s77(2) of the VP Act and if we are satisfied that they will collect, store and use the information in a way that protects the privacy of any person to whom the information relates.

## DISCLOSURE OF SENSITIVE INFORMATION

We will only disclose your sensitive information if you agree to us doing so, or you would reasonably expect us to disclose the information for another purpose directly related to the purpose it was collected for.

## DISCLOSURE TO SERVICE PROVIDERS

We contract service providers to support us in delivering specific functions and services. In some circumstances it may be necessary for us to disclose your personal and/or sensitive information to these providers to enable them to perform their work effectively.

We protect information that may be disclosed to service providers by only entering contracts with providers who agree to: maintain confidentiality, only use the information in accordance with the contract, and comply with the Privacy Act, the VP Act, other relevant Victorian Government legislation and our Privacy Policy. All persons who may have access to your personal information may be subject to background checks and will be restricted to the minimum access privileges required to perform their duties.

## DISCLOSURE TO PARTIES OUTSIDE AUSTRALIA

From time to time, we disclose personal information to parties outside Australia. For example, in a letter of professional standing sent to an international registration authority on a veterinary practitioner's request.

If we disclose your personal information to a party outside Australia, we will generally obtain your express consent before disclosing the information (unless you requested that disclosure).

We may disclose your personal information to a party outside Australia without obtaining your consent if required or authorised by Australian law, by order of a court or tribunal, or if reasonably necessary for law enforcement related activities.

## 4. STORAGE AND SECURITY OF PERSONAL INFORMATION

The VPRBV takes reasonable steps to ensure the personal and sensitive information we collect is safe and secure, and protected from misuse, interference, loss or unauthorised access, modification or disclosure.

Storage of personal and sensitive information is managed in accordance with any requirements set out by the legislation under which it was collected, including the Privacy Act and the VP Act.

The personal and/or sensitive information we collect is stored within Australia.

Personal information is primarily stored in electronic format within our data systems. This includes payment details obtained to process an electronic or in-person financial transaction stored in the Board's accounting system. To guard against unauthorised access to the systems used to store personal and sensitive information (e.g. cyber threats), we have implemented protections and mitigation strategies recommended by the Australian Government's technical authority on cyber security - the Australian Centre for Cyber Security of the Australian Signals Directorate.

Some personal and/or sensitive information is stored in physical format at the Board's office. Physical records of personal and/or sensitive information are stored securely.

Access to electronic and physical records is limited to necessary persons. Under section 77 of the VPA all persons employed or contracted by us are required to sign confidentiality agreements.

We take reasonable steps to destroy personal and/or sensitive information and/or ensure it is de-identified if it is no longer required.

## STORAGE OF INFORMATION DISCLOSED TO THIRD PARTIES

Under s77 of the VP Act, we may not disclose or communicate information to another person unless we are satisfied that they will collect, store and use the information in a way that protects the privacy of any person to whom the information relates.

## 5. ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

Under the Privacy Act, you have the right to ask to access any personal and/or sensitive information the VPRBV holds about you. We are required to take reasonable steps to ensure the personal information we collect about you is accurate, up to date and complete. You have the right to ask that we correct your personal information.

### HOW TO ACCESS YOUR PERSONAL INFORMATION

You have the right to request access to personal and/or sensitive information we hold about you. You can request access either by

- emailing us at [communications@vetboard.vic.gov.au](mailto:communications@vetboard.vic.gov.au)
- or completing our contact form: [www.vetboard.vic.gov.au/VPRBV/VPRBV/ContactUs.aspx](http://www.vetboard.vic.gov.au/VPRBV/VPRBV/ContactUs.aspx)

We will not charge you any fees to lodge a request to access your personal and/or sensitive information or provide you with access to information after you lodge a request. Note that freedom of information requests are not covered by this policy and do incur fees (see below).

We must respond to your request to access your information within 30 days.

We must provide you with access to your personal and/or sensitive information on your request, if it is reasonable and practical to do so.

In some cases, if we are unable to provide information to you, you will be advised that you can lodge a Freedom of Information (FOI) request under the *Freedom of Information Act 1982*. Under the FOI Act, you have a right to request access to documents we hold containing information about you. Information on FOI access and how to make a request can be found on our website at Freedom of Information ([www.vetboard.vic.gov.au/VPRBV/Freedom\\_of\\_Information.aspx](http://www.vetboard.vic.gov.au/VPRBV/Freedom_of_Information.aspx)) and the website of the Office of the Victorian Information Commissioner (<https://ovic.vic.gov.au>).

### HOW TO ASK FOR YOUR PERSONAL INFORMATION TO BE CORRECTED

You have the right to ask us to correct any personal and/or sensitive information we hold about you if you believe it is incomplete, incorrect, out-of-date or misleading. You can request this either by

- emailing us at [communications@vetboard.vic.gov.au](mailto:communications@vetboard.vic.gov.au)
- or completing our contact form: [www.vetboard.vic.gov.au/VPRBV/VPRBV/ContactUs.aspx](http://www.vetboard.vic.gov.au/VPRBV/VPRBV/ContactUs.aspx).

We must respond within 30 days of receiving a request to correct your information.

We must take reasonable steps to correct your personal and/or sensitive information and satisfy ourselves that it is up-to-date, accurate, complete and not misleading in relation to the purpose for which it is held.

If we make a correction and the incorrect information was previously disclosed to others, you can ask us to notify those persons or organisations about the correction.

There may be reasons why we decline to correct your personal information. For example, we may be required or authorised by law to not correct the information. If we decline to correct your personal

information, you can ask us to put a statement near the information which says that you believe it is incorrect and why.

We will not charge you any fees for making a correction request, correcting personal and/or sensitive information or putting a statement from you near that information.

## 6. MAKING A COMPLAINT OR CONTACTING US ABOUT YOUR INFORMATION PRIVACY

### HOW TO MAKE A COMPLAINT

If you believe the VPRBV has breached your privacy in relation to the personal and/or sensitive information we hold about you, you can make a complaint to us.

Complaints should be made in writing. We can help you to lodge your complaint if you require assistance.

We take complaints about privacy very seriously. We will acknowledge your complaint within 5 working days of receiving it. We will consider how we can resolve the issue satisfactorily, with an aim of responding to your complaint within 21 working days. If we find that your privacy has been breached, we will determine how and why the privacy breach occurred, take any necessary action to resolve the breach, and take action to prevent recurrence of the breach.

If you are not satisfied with our response to the complaint, you can ask for a review by a more senior officer.

You also have the right to submit a formal privacy complaint to the Office of the Victorian Information Privacy Commissioner (the OVIC). The OVIC is an independent body and will assess your complaint to decide if our actions breached your privacy. To make a privacy complaint or enquiry with OVIC, you can:

- use the OVIC website: <https://ovic.vic.gov.au/privacy/for-the-public/privacy-complaints>
- call the OVIC enquiry line on 1300 006 842.

### HOW TO CONTACT US

For more information on the collection, use, security of personal and/or sensitive information we hold about you, or accessing or correcting this information, you can contact us:

- by email at [communications@vetboard.vic.gov.au](mailto:communications@vetboard.vic.gov.au)
- via the contact form on our website at [www.vetboard.vic.gov.au/VPRBV/VPRBV/ContactUs.aspx](http://www.vetboard.vic.gov.au/VPRBV/VPRBV/ContactUs.aspx)
- phone on +61 3 9620 7444 (leave a message).

We are committed to making this policy as accessible to as many people as possible. You can request a copy of this policy in the form of a printed document, an accessible PDF or in MS Word via the contact details above.

If you require an alternative format of this document, if you are deaf or hearing impaired or if English is not your first language, you can get assistance by contacting the following services:

- Vision Australia: 1300 847 466
- National Relay Service: 13 36 77
- Translating and Interpreting Service: 131 450.



## PUBLICATION DETAILS

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