

## CCEA Privacy Policy

### Introduction

This Privacy Policy describes the personal information that may be collected by us, the choices you can make about your personal information and how we protect your information.

CCEA is committed to protecting the privacy, confidentiality and security of personal information. To meet your expectations about privacy and confidentiality, the CCEA procedures comply with the Australian Privacy Principles contained in the *Privacy Act 1988*, and also with the Privacy Principles contained in the New Zealand *Privacy Act 2020*. We aim to ensure that our practices with respect to the collection, use, disclosure and storage of personal information are open and transparent and that the members of the public are aware of their rights.

For more information on the Privacy Act and the Australian Privacy Principles, contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au). Information regarding the New Zealand Privacy Act and the New Zealand Privacy Principles can be obtained from the New Zealand Privacy Commissioner at [www.privacy.org.nz](http://www.privacy.org.nz).

### Collection of personal information

Personal information is defined as ‘information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.’<sup>1</sup>

We collect personal information only if it is reasonably necessary for performing one or more of our functions. Our functions span governance, accreditation and skills assessment activities – more detail about our functions can be found on the CCEA website at [www.ccea.com.au](http://www.ccea.com.au).

We may collect information from:

- Directors and Committee members
- Consultants and contractors
- Institutions seeking or maintaining accreditation
- Applicants and candidates in the qualification and skills assessment process
- Regulatory and professional bodies.

We may collect personal information when you:

- Contact us by phone, email or via our website
- Write to us
- Complete and submit an application

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<sup>1</sup> Office of the Australian Information Commissioner, *What is personal information?* [website], <https://www.oaic.gov.au/privacy/privacy-guidance-for-organisations-and-government-agencies/handling-personal-information/what-is-personal-information#:~:text=The%20Privacy%20Act%20defines%20'personal,a%20material%20form%20or%20not.> (accessed 8 November 2023).

- Participate in an accreditation evaluation process
- Undertake an examination.

We will collect personal information from you by lawful and fair means and not in an unreasonable intrusive way.

If you choose not to provide your personal information when requested, we may not be able to perform the function you require. We will endeavour to make this as clear as possible for each function. In some cases, where it is lawful and reasonable, you may interact with us anonymously or by using a pseudonym (alias). When this option is available to you, we will endeavour to make this clear.

We collect different personal information depending on the function you are involved with. Examples include:

- **Governance.** All Directors and Committee members are required to complete declarations of interest, in order for potential and actual conflicts to be identified.
- **Accreditation.** When an education institution is seeking accreditation of a chiropractic program, staff qualifications and experience will be captured to inform the evaluation of that program.
- **Qualification and skills assessment.** When an overseas trained chiropractor is seeking to have their qualifications and skills assessed for the purpose of registration or migration, a range of proof of identity details (e.g. name, date of birth, address, copy of passport) will be collected. In addition, any assessment candidate requesting special consideration on the basis of health status may voluntarily submit supporting documentation (e.g. medical certificate, letter from a general practitioner (GP), medical report).

Unsolicited personal information is personal information about an individual that an organisation has unintentionally received. When this happens, we will protect your personal information with the same rigour as we treat personal information that we intended to collect.

If you have any questions about the information we collect that are not addressed in this policy, please feel free to contact us using the methods at the bottom of this policy.

### Use and sharing (disclosure)

We use your personal information only for purposes consistent with the reason for which you provided it, or a directly related purpose.

We may disclose your personal information on a confidential basis to our agents, contractors or third-party service providers. We may also disclose your personal information on a confidential basis to entities with which we have co-regulatory functions. Contractual and other quality assurance measures are used to ensure your personal information is protected. For example:

- **Governance.** All Directors must provide information to verify their identity. This is shared with government agencies such as the Australian Charities and Not-for-profits Commission (ACNC), Australian Securities and Investments Commission (ASIC) and the Australian Taxation Office (ATO) in order to comply with the organisation's legal requirements.
- **Accreditation.** Information received to inform the evaluation of a chiropractic program will be provided to evaluators, site evaluation team members and committee members, who may be based in Australia or New Zealand. Strict confidentiality policies are in place and CCEA requires individuals who undertake accreditation activities to sign declarations in relation to maintaining confidentiality. CCEA may also disclose information provided during

the accreditation process to the regulatory authorities in Australia and New Zealand (i.e. Chiropractic Board of Australia, New Zealand Chiropractic Board).

- **Qualification and skills assessment.** We only discuss information regarding an application with the applicant unless a third-party agent (including spouse or immediate family) has been authorised in writing by the applicant. Document verification and the development and conduct of examinations require specific expertise. These services are provided by third-party service providers, according to CCEA-approved policies and procedures. Strict contractual requirements are in place with third party service providers to protect your personal information. CCEA may also disclose information about individuals who are seeking registration as a chiropractor in Australia or New Zealand to the regulatory authorities in those countries (i.e. Chiropractic Board of Australia, New Zealand Chiropractic Board). For individuals seeking to migrate to Australia, information may be disclosed to the Department of Home Affairs.

Information will only be disclosed to a person in another country when that is necessary for the performance of our functions, and we have obtained your consent to do so.

Information may also be disclosed where the law requires us to do so, or where you provide written consent.

### Security of personal information

We are committed to protecting and securing your personal information. We will take all reasonable steps to protect your personal information from misuse, loss and unauthorised access, modification and disclosure. We keep some information for a number of years to comply with legal requirements. Any personal information that is no longer required is disposed of in a secure manner.

### Rights and choices

**Access to your personal information:** You have the right to request access to the personal information we hold about you. This right is subject to certain exceptions (as allowed by law), including circumstances where:

- Access would pose a serious threat to the life or health of any individual
- Access would have an unreasonable impact on the privacy of others
- The request is frivolous or vexatious
- The information relates to existing or anticipated legal proceedings, and would not be accessible by the process of discovery in those proceedings
- Giving access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- The information relates to a commercially sensitive decision-making process
- Access would be unlawful.

Any request for access should be made in writing to us via the contact details provided. We will not charge a fee for an access request, however you may be charged any reasonable expenses incurred by us in facilitating a request (e.g. search and photocopying costs, where applicable).

If a request for access is declined, we will provide our reasons for doing so.

**Correction of your personal information:** Some personal information we hold may become out of date. If you advise of a change in the information we hold, we may require documentary evidence to support those changes and we will amend our records accordingly. We will not

charge a fee for an update request, however you may be charged any reasonable expenses incurred by us in facilitating a request (e.g. document verification costs, where applicable). Any request for a change to your personal information should be made in writing to us. Where we are unable to update your information, we will provide an explanation in writing as to why the information cannot be corrected.

### How to make a complaint

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy.

To contact us with a compliment or complaint or a privacy question, you can contact us using the details below.

#### Contact details

Executive Officer  
Council on Chiropractic Education Australasia  
Ngunnawal Country  
GPO Box 622  
Canberra ACT 2601  
Australia  
Phone: +61 2 6100 6264  
Email: [admin@ccea.com.au](mailto:admin@ccea.com.au)

All complaints received will be assessed and reasonable steps will be taken to remedy any valid complaint. We will respond to your complaint within 30 business days of receipt of the complaint. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner or the Office of the New Zealand Privacy Commissioner.

### Further information on privacy

Australian residents can obtain further general information about your privacy rights and privacy law from the Office of the Australian Information Commissioner by:

- Calling their privacy hotline on 1300 363 992
- Visiting their website at [www.oaic.gov.au](http://www.oaic.gov.au)
- Writing to:  
The Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001

New Zealand Residents can obtain further general information about your privacy rights and privacy law from the Office of the Privacy Commissioner by:

- Calling their privacy enquiry line on 0800 803 909
- Visiting their website at [www.privacy.org.nz](http://www.privacy.org.nz)
- Writing to:  
The New Zealand Privacy Commissioner  
PO Box 10 094  
Wellington 6143

**CCEA Ltd**  
**Adopted:** August 2017  
**Amended:** November 2023  
**Next Review:** November 2025