

## Summary of requirements – MRS Terms and Conditions

CASA allows DAMEs to access MRS Online—and the records contained in that system—so they can perform DAME Activities. This access is subject to the Terms and Conditions set out at Chapter 13 of the [DAME Handbook](#).

MRS Records contain health and personal information of medical aviation certificate applicants.

CASA takes the security of health and personal information very seriously; it employs robust measures to protect this information from misuse and unauthorised access, modification or disclosure.

The Terms and Conditions describe various security and privacy measures DAMEs must implement to protect against these risks. Apart from ensuring the security and integrity of MRS Online, these measures are designed to enable CASA to comply with its privacy obligations for collecting, protecting, using and disclosing personal information.

The measures DAMEs are required to implement cover a variety of information management practices and procedures. In addition to requirements for establishing a privacy management framework and security safeguards, these measures include practices and procedures for:

- storing, transmitting and (where necessary) destroying MRS Records securely, and
- correcting/altering personal information in Relevant Records
- managing redundant or compromised user accounts, and
- responding to Data Breaches.

### Privacy management framework requirements

To comply with the Terms and Conditions, DAMEs will need to review their privacy management practices. In particular they will need to ensure they have a framework (e.g. a Privacy Policy and a DBR Plan) describing procedures and practices appropriate for handling and protecting MRS Records.

The Terms and Conditions do not require DAMEs to create a privacy management framework especially for handling MRS Records. They enable DAMEs to use or adapt elements of their organisation's existing framework for this purpose. If those elements already provide a sufficient level of protection, DAMEs do not need to do anything extra to comply with the Terms and Condition's requirements in this regard. However they will need to review those elements periodically to ensure they continue to be effective and relevant.

Where a DAME cannot satisfy these requirements by adapting their organisation's existing privacy management framework, they will need to create them. The Terms and Conditions contain guidance notes detailing various guides and templates DAMEs can use for this purpose. These notes include materials specifically designed for the medical profession (e.g. the [RACGP's privacy policy template](#) and the [AMA Privacy and Health Record Resource Handbook](#)) and others addressing particular issues (e.g. the OAIC's [Guide to Securing Personal Information](#)).

### Transitional arrangements

Many of the Terms and Conditions' requirements would be familiar to DAMEs as they are similar to ones applying to their handling of any medical record. However CASA recognises some DAMEs may be less familiar with other requirements, especially ones for implementing particular elements of a privacy management framework (e.g. a DBR Plan). CASA acknowledges these DAMEs may need extra time to implement these elements.

The Terms and Conditions include transitional arrangements allowing for this. These arrangements enable DAMEs to apply for extra time to implement privacy management framework components.

To take advantage of these transitional arrangements, DAMEs must notify CASA by 1 May 2016 of any shortfall in their current framework, commit to rectify it by 1 June 2016 (or by any later date agreed by CASA) and confirm to CASA when they have done so. However these transitional arrangements do not affect the DAME's legal or ethical obligations for protecting the confidentiality, integrity or privacy of the personal information contained in MRS Records, which DAMEs must continue to comply with.