

Privacy Policy

Effective: January 2023

Introduction

CPD Home is committed to ensuring the privacy of its subscribers. The purpose of this policy is to share with subscribers how we handle their personal information and protect their privacy in accordance with relevant legislation. We are subject to and comply with the *Privacy Act 1988* (Cth) and other applicable State and Territory privacy law. There is more information about these laws on the Australian Information Commissioner's [website](#).

This policy outlines the way CPD Home collects, holds, uses, and discloses personal information, and the procedures that allow access to this information. The policy also outlines how CPD Home will respond to suspected or known data breaches of personal information.

Who are we?

doctorportal Learning Pty Ltd, trading as 'CPD Home' is a wholly owned subsidiary of the Australian Medical Association (WA) Inc.

CPD Home is available to non-exempt medical practitioners in Australia at www.cpdhome.org.au. It is not limited to members of the AMA.

CPD Home provides CPD services for medical practitioners, including the provision of the CPD Program of Learning, directing subscribers to high-quality accredited CPD relevant to medical scopes of practice, and supporting attainment and management of CPD via in-house bespoke specialist CPD tracking software known as the CPD Tracker.

What personal information do we collect and how do we collect this?

CPD Home collects personal information from persons enquiring about or applying for the CPD Home service. This may include subscribers, members of the public, journalists, government agencies and other organisations seeking information or comment about our services, visitors to our website, and individuals purchasing services from us and from our suppliers. CPD Home will do its utmost to protect any sensitive information collected in the process.

Personal information is collected directly and indirectly where required from individuals when they subscribe or make contact with CPD Home. Personal information may include full name, contact details, payment details and may include other personal information (e.g. professional details). Information collected may be provided directly by you such as when completing a form, corresponding, or communicating with us (including in person, digitally, telephonically or electronically).

CPD Home may also collect personal information indirectly via publicly available sources such as websites, social media, directories and databases. Personal information may also be collected indirectly while providing a service or managing a complaint. This may include via authorised representatives of the individual; CPD activity supporting documents; CPD Home staff or service providers; regulatory bodies authorities and bodies, professional or specialist societies or associations.

We also collect information about subscribers' use of the service, such as module completions or module views.

How do we use and store your personal information?

CPD Home uses this information to:

- verify your eligibility to access the services of the CPD Home and any applicable discounts;

- inform you about the services, learning, products, events and publications we provide;
- provide you with CPD Home services;
- enable the CPD tracking software to assist you to manage your CPD activities and reporting;
- improve our services, for example, to understand which learning topics are popular or to support website improvements for subscribers;
- communicate with you about your CPD compliance; and
- report your compliance status to the Medical Board of Australia to meet the CPD standards framework.

We store your information in electronic systems housed in the Cloud under our control. We take appropriate steps to protect the security of the information we hold about you, including protections against unauthorised access, virus or other electronic intrusions, fire, theft or loss. We require any contracted providers of IT services to do the same.

Our staff are bound by strict requirements regarding the protection of the privacy of the information we collect and hold about you. We or any contracted providers of IT services may use servers, systems and cloud computing providers outside of Australia. Our contracts with them require them to protect the privacy of your information when held on these servers and/or using cloud computing. Our contractors are also required to comply with the *Privacy Act 1988* (Cth).

What about use of personal information for direct marketing?

Australian privacy law limits the use of personal information for direct marketing of goods and services. We use your personal information to keep you informed about CPD Home services, products, events and publications.

Where we send you direct marketing material about our services we provide you with a means to advise us that you no longer wish to receive some or all of this material.

If at any time you have a concern about direct marketing material you have received from us, or you wish to change your preferences in relation to receipt of future material, please contact us at enquiries@cpdhome.org.au

How can CPD Home subscribers update or amend their information?

CPD Home subscribers can easily update their information by visiting www.cpdhome.org.au or by contacting the CPD Home team by email: enquiries@cpdhome.org.au.

Do you have a right to see what information we hold about you?

Under the *Privacy Act 1988* (Cth), you have rights of access to personal information we hold about you. These rights also include correction of any errors in this information. Should you wish to access this information, please contact us at enquiries@cpdhome.org.au. Unless the access you request will require special steps or significant resources, there will be no charge for providing you with this access.

Do you send my information overseas?

In addition to the use from time to time of data storage and cloud providers, we may provide deidentified data to overseas bodies. For example, we may provide deidentified data in report on uptake of specific learning activities to a certified learning provider which could be based overseas.

For how long do you keep my personal information?

We generally keep your personal information active for as long as is reasonably required to enable us to meet your needs. We keep subscriber records and other personal information on file to

enable us to undertake statistical and historical analysis and reporting. As part of our data security, we regularly backup and archive our electronic databases.

Non-subscriber information will be retained for up to 7 years.

What happens should you suspect or there is a data breach?

If we suspect or know there has been a data breach, in line with the Australian Information Commissioner’s guide for managing and responding to data breaches, we will act to:

- **Contain** - the breach to prevent any further compromise of personal information;
- **Assess** - the situation to determine how the breach occurred and evaluate the risks, including any potential harm to affected individuals, and where possible take remedial action to reduce any risk of harm;
- **Notify** – individuals and the Commissioner, as may be required, and in a manner deemed appropriate; and
- **Review** - the incident and take action to prevent further breaches.

Where can I find out more?

If you would like further information regarding how we collect, store, use or disclose your personal information, or have any issues or concerns, please contact CPD Home by emailing enquiries@cpdhome.org.au.

Related Documents / Legislation

The following documents are related to this policy.

1. [Privacy Act 1988](#)
2. Office of the Australian Information Commissioner - Data breach preparation and response
A guide to managing data breaches in accordance with the Privacy Act 1988 (Cth)

Appendices

1. Glossary

Version Tracking

Version	Approval Effective Date	Comments
1.0	December 2022	

Appendix 1

Glossary

Term	Definition
Appeal	Of a decision, to be undertaken by an Appeals Committee, an ad-hoc committee of the AMA (WA) Board.
Applicant	Any Subscriber or Education Provider directly affected and unsatisfied with an CPD Home decision who applies to have the decision reviewed, reconsidered or appealed.
Aphra	Australian Health Practitioner Regulation Authority
Certified Learning Provider	A learning provider who is certified by CPD Home, and can apply for accreditation of a CPD activity for listing in the CPD Learning catalogue.
Conflict of Interest	<p>A conflict of interest occurs when a person's personal interests' conflict, or could be perceived to conflict, with their responsibility to act in the best interests of CPD Home.</p> <p>Conflict of interests may be:</p> <ul style="list-style-type: none"> • Real – where a direct conflict exists between the decision maker and their duty to act in the best interests of CPD Home. • Apparent – where it appears or could be perceived that personal interests are influencing the decision maker to not act in the best interests of CPD Home. • Potential – where personal interests are not currently but could come into conflict with their duty to act in the best interests of CPD Home.
CPD Advisory Panel	Panel of medical advisers which provides advice to the AMA (WA) CEO and senior leadership team regarding the CPD Home Program.
CPD Home 'Catalogue'	This is the catalogue of learning modules and readings available to CPD Home subscribers.
CPD services	Carrying out 'CPD Home' related functions or activities offered to subscribers.
CPD Tracker	Online tracking tool enabling subscribers to record courses, events and other completed CPD activities. Each CPD activity record includes the length of time, area for self-reflection and optional storage of learning evidence.
Learning Providers	Entities who deliver education or learning to doctors.
CPD Home Executive	Includes the AMA (WA) CEO, Chief Operating Officer and Chief Financial Officer
CPD Home Managers	Line managers responsible for a particular area of the CPD Home business.
CPD Home Program of Learning	The CPD Home Program of Learning (CPD Program) provides a pathway for Australian registered medical specialists, international medical graduates, PGY2+ trainees and non-vocationally registered doctors to engage in an accredited CPD program. From 1 January 2023, the CPD Program is a mandatory program for subscribers to the CPD Home service.
CPD Home Staff	Includes employees or contracted consultants, legal or financial professionals acting for CPD Home
CPD requirements	Means CPD requirements against the Standard, as follows: <ul style="list-style-type: none"> • develop a written annual professional development plan;

	<ul style="list-style-type: none"> • complete a minimum of 50 hours per year of CPD activities that are relevant to your scope of practice and individual professional development needs; • allocate your minimum 50 hours per year between the following types of CPD activities: <ul style="list-style-type: none"> ◦ at least 12.5 hours (25 percent of the minimum) in educational activities; ◦ at least 25 hours (50 per cent of the minimum) in activities focused on reviewing performance and measuring outcomes, with a minimum of five hours for each category; and ◦ the remaining 12.5 hours (25 percent of the minimum), and any CPD activities over the 50-hour minimum across any of these types of CPD activity, including any relevant specialty high-level requirements; • self-evaluate your CPD activity at the end of the year as you prepare your professional development plan for the next year; and • retain records of your annual CPD activity for audit by your CPD home and the Board for three years after the end of each one-year cycle.
CPD Year	The CPD Year is 1 January to 31 December.
Complaint	Dissatisfaction or concern about the conduct or actions of CPD Home expressed in a written complaint submitted via the CPD Home Complaint Form by a: <ul style="list-style-type: none"> • Subscriber to CPD Home services; • CPD Home Education or Service Provider; or • Member of an CPD Home decision making or advisory entity.
Complaints Officer	A CPD Home staff member trained in complaints handling and delegated the responsibility for managing a complaint.
Cooling off period	A 14 day period in which the subscriber can change their mind about subscribing without penalty.
CSV File	Comma Separated Value - A electronic file in which the data in each data field is separated by a comma.
Decision maker	Any person or persons making decisions for or on behalf of CPD Home.
Deferral	An extension of time, up to three months from the end of the CPD Year, in which to complete the CPD requirements for that CPD Year. The deferred CPD activities to be undertaken concurrently with the current CPD Year requirements.
eDM	Electronic Direct Mail
Exemption	CPD requirements for the CPD Year are waived.
Exit Poll	A series of questions to ascertain reasons for subscription cancellation and identify areas for improvement.
Frivolous report or complaint	The matter giving rise to the report or complaint is minor or trivial, vague or poorly explained inhibiting its investigation, or unable to be substantiated?
Learning Management System (LMS)	Online system used to deploy, track and report completion of learning activities measured against the CPD Program.
Malicious report or complaint	A report or complaint that appears to be motivated by a purpose that is dishonest and intended to cause harm.
Outgoing Subscribers	Subscribers who are moving to a different CPD home provider.
Parent Entity	doctorportal Learning Pty Ltd, trading as 'CPD Home' is a wholly-owned subsidiary of the Australian Medical Association (WA) Inc.

Participating Subscribers	Subscribers to CPD Home who do not have an exemption and who by default are participating in the 'CPD Program'
Personal information	Personal information includes a broad range of information such as name, gender, contact details, financial information and may also include other personal information (e.g. professional details) or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.
Personal interest	Personal interests include where the decision maker or a person or organisation affiliated with them would receive a benefit or incur a detriment because of the decision being made. That benefit or detriment could be financial or non-financial.
Point-in-Time Snapshot	A Point-in-Time snapshot is a copy of a storage volume, file or database as they appeared at a given point in time and is used as a method of data protection. In the event of a failure, data can be restored from the most recent snapshot before the failure.
Procedural matters	Refer to an application for a Review or Appeal of a CPD Home decision.
Professional details	Professional details include information such as qualifications, scope of practice, specialty or specialties, employment information (status, type, role), and educational/supervisory/research activities.
Sensitive information	Sensitive information is personal information that includes information or an opinion about an individual's: <ul style="list-style-type: none"> • racial or ethnic origin • political opinions or associations • religious or philosophical beliefs • trade union membership or associations • sexual orientation or practices • criminal record • health or genetic information • some aspects of biometric information
Subscribers	Subscribers to CPD Home may be members of the AMA or non-member medical practitioners who have selected us as their CPD Home.
Reconsideration	Of a decision, to be undertaken by the original decision maker
Review	Of a decision, to be undertaken by a Review Panel
Review Panel	A panel comprised of three people chosen at the discretion of the CEO or their delegate for purpose of reviewing a decision under the Review, Reconsideration and Appeals Policy. The Review Panel shall not include a member who participated in the original decision or its reconsideration, or who otherwise has, or is perceived to have, a conflict of interest.
Register of Interests	A record of declared or identified conflicts of interests listing to whom they apply, the nature and extent of the conflict and any steps taken to address it.
the Standard	<i>MBA Registration Standard: Continuing Professional Development</i>
Variation	The hours for each domain of CPD activity as per the Standard for the CPD Year are proportionally reduced to reflect the period where the subscriber did not practise medicine.
Vexatious report or complaint	A report or complaint that is falsely made, unwarranted or made repetitively, or made for some other collateral purpose such as to cause delay or disruption, gain leverage or cause disadvantage or to harass or annoy.