

Remediation Policy

Effective: January 2023

Introduction

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.

Background

CPD Home is committed to supporting its subscribers:

- to undertake meaningful professional development;
- to meet their Continuing Professional Development (CPD) requirements under the Medical Board of Australia (MBA) *Registration Standard: Continuing Professional Development* (the Standard); and
- to easily demonstrate that they have done so should they be audited by the MBA.

Similarly, CPD Home is committed to supporting those subscribers who have been identified for remediation with identifying, sourcing, and acquiring the required competencies for the provision of safe health care.

Purpose

The purpose of this policy is to outline the steps to be followed by CPD Home when subscribers have self-identified or been identified as poorly performing and/or require remedial management, or up-skilling to comply with their relevant standard for continued medical registration.

Objective

To support those subscribers, seeking or requiring remediation, to develop and undertake a learning program tailored to their individual learning and performance review needs that address the issue(s) identified by any regulatory authority and encourage the development of required knowledge, skills and attitudes.

Scope

The policy covers all CPD Home subscribers who are identified as requiring remediation for not performing to expected standards or who are formally required by a regulatory body for performance improvement or upskilling.

Definitions

The following definition(s) apply to this policy and where applicable, its procedures.

Term	Definition
CPD Advisory Panel	Panel of medical advisers which provides advice to the AMA (WA) CEO and senior leadership team regarding the CPD Home Program.
Outgoing subscriber	Subscribers who are moving to a different provider of CPD home services.
Remedial activities	Activities to address the under-performance of a subscriber, which may include clinical up-skilling, further training, supervision or mentoring.

Remediation	Action to overcome a situation of deficiency.
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Policy

Wherever a subscriber self-identifies or is identified by a regulatory body or employer as needing remediation CPD Home will, upon a request from the subscriber, with advice from CPD Advisory Panel as required, work with the subscriber, and, if required, any relevant specialty college, to identify remedial activities and implement a plan to address the reasons for the remediation.

Remediation activities may involve:

- clinical upskilling
- education on ethical and professional behaviour
- training and/or mentoring to enhance decision making, teamwork, leadership and supervisory skills
- any other aspects as identified by either the regulatory body or the CPD Advisory Panel.

Any remediation plan agreed to by the subscriber will be incorporated by CPD Home into the subscriber's professional development plan for that CPD Year.

Should CPD Home not be able to provide the subscriber with required remedial activities, they will refer the subscriber to learning providers who may be able to assist. This may require the subscriber and CPD Home to work with another CPD home provider. Should a subscriber choose to move CPD homes, CPD Home does not provide a refund to outgoing subscriber's but will facilitate any required transfer of a subscriber's details and CPD records from one CPD home provider to another.

Where a subscriber is required to undertake remedial activities, the costs involved in undertaking those activities are at the subscriber's expense.

If the subscriber remains with CPD Home, we will continue to monitor the subscriber's progress and completion of remedial activities against their amended professional development plan.

The amended professional development plan should include:

- a reflection on learning needs
- learning goals
- specified activities for addressing the learning need
- the timeframe for completion
- any supervisory arrangements where required.

Provided all activities in the amended professional development plan are completed by the cut-off date for the end of the CPD Year, CPD Home will issue the subscriber a CPD Statement of Completion. Should the subscriber not complete the activities required they will still be able to download a record of their CPD activities for a CPD Year.

Roles and Responsibilities

Subscriber

The subscriber will be responsible for:

- requesting advice if he/she requires it on CPD activities to support their remediation;
- working with CPD Home to identify remedial activities to address the reasons for remediation;
- agreeing to the inclusion or required remediation activities into their current professional development plan;

- completing the required activities as per the revised professional development plan and all CPD requirements;
- reflect upon their professional development plan at the end of the CPD Year; and
- reporting and demonstrating to the regulatory body the actions taken to address the reasons for remediation.

CPD Home Support Officer

The CPD Home Support Officer will be responsible for:

- responding to the subscriber request for support, and seeking further clarification if required;
- seeking advice from the General Manager CPD Home and the CPD Advisory Panel on relevant CPD activities or any other remedial activities to address the reasons for remediation;
- counselling the subscriber requiring remediation on relevant CPD activities that could be incorporated into their professional development plan;
- making any agreed changes to the subscriber's professional development plan; and
- monitoring through the CPD Home audit process the subscriber's progress towards completion.

General Manager CPD Home

The General Manager CPD Home will be responsible for:

- reviewing the request for support and providing advice as required on relevant CPD activities or any other remedial activities to address the reasons for remediation;
- requesting support from the CPD Advisory Panel, if required
- liaising with a specialty college or professional association as required regarding appropriate remedial activities, and/or supervisory requirements and support

CPD Advisory Panel

The CPD Advisory Panel will be responsible for reviewing the request for support and providing advice as required on relevant CPD activities or any other remedial activities to address the reasons for remediation.

Action

Upon a request from a subscriber for advice on CPD activities to address required remediation, CPD Home will:

- acknowledge receipt of request;
- seek any further clarification from the Subscriber required;
- prepare information relevant to the request for the review of the General Manager CPD Home and/or CPD Advisory Panel, if required. Consultation with the CPD Advisory Panel may occur out-of-session or in-session as required to ensure timeliness of response;
- counsel the subscriber on relevant CPD activities for inclusion in their professional development plan;
- when agreed with the subscriber, amend the professional development plan as required;
- liaise with relevant specialty college/s or professional association should remedial activities, external to the CPD Home Program, or supervision or mentorship of the subscriber, be required;
- provide any transfer of data that may be required on request;
- monitor the subscriber's progress towards completion of required CPD activities as per their revised professional development plan, and provide support when required;
- issue a CPD Statement of Completion when CPD requirements are met; and

- archive (and retain for seven years after the reporting period for each CPD Year) the subscriber’s record of CPD activity for the relevant CPD Year.

Related Documents / Legislation

1. Participation and Compliance Policy
2. Data Management Policy

Appendices

1. Glossary

Version Tracking

Version	Date	Comments
1.0	December 2022	
1.1	February 2022	Amendment to reflect General Manager, CPD Home job title.

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	<p>Means CPD requirements against the Standard, as follows:</p> <ul style="list-style-type: none"> • develop a written annual professional development plan; • complete a minimum of 50 hours per year of CPD activities that are relevant to your scope of practice and individual professional development needs;

	<ul style="list-style-type: none"> • 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	MBA <i>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.