

Subscriber Communications 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 provides Australian registered medical specialists, international medical graduates, PGY2+ trainees and non-vocationally registered medical practitioners a CPD Program of Learning. The CPD Home aims to provide a program that address a wide range of learning to meet the continuing professional development needs of its subscribers.

CPD Home is committed to supporting its subscribers to:

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

Purpose

To ensure CPD Home subscribers are informed about how and why we intend to communicate with them.

Objective

To outline the processes and purposes in our communications with how CPD Home will communicate with its subscribers.

Scope

This policy applies to interactions between CPD Home and its prospective or existing subscribers about matters relating to CPD Home operations and services, including communications about:

- the services we provide;
- any matters relating to the CPD Home Program, or any of its policies, or fees, including changes, clarifications, or notifications;
- learning that is new or available in the CPD Home 'Catalogue';
- relevant information pertaining to the MBA *Registration Standard: Continuing Professional Development*;
- their progress towards meeting their CPD requirements;
- activities that would contribute to a subscriber meeting their CPD requirements; and
- recourses available to subscribers if their capacity to meet their CPD requirements is being impacted by financial hardship or exceptional circumstances, or they have a complaint, or want to have a decision reconsidered, reviewed or appealed.

Definitions

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

Term	Definition
CPD requirements	Means CPD requirements against the Standard, as follows:

	<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; • 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; • 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; • including program-level requirements, and any relevant specialist high-level requirements.
eDM	Electronic Direct Mail

Policy

General Principles

We are committed to ensuring timely, efficient, and effective communications between us and our prospective or existing subscribers.

We aim to make readily available the information you need when planning your learning needs, identifying CPD activities, and recording CPD activities completed.

We are committed to supporting you to be proactive in your communications with us and in meeting your CPD requirements.

We are here to support you in meeting your CPD requirements and encourage you to reach out to us should you need assistance with anything related to your CPD.

We understand that you are busy and will work with you to accommodate your availability should we need to speak directly to you.

We aim to always be respectful, fair, and just in our communications with you, and wherever possible will endeavour to explain the rationale for decisions taken.

Frequently Asked Questions (FAQs)

We understand there will be times when you have questions. To help address queries as quickly as possible we have put together a list of FAQs. This list will be modified on an ongoing basis to reflect and address the queries we receive.

We encourage you to review the FAQs before contacting us, as the answer to your query may already be available.

Enquires

After viewing our FAQs, prospective or existing subscriber enquiries should be emailed to us at enquiries@cpdhome.org.au. This will allow us to:

- a. direct your query to the most appropriate staff member to respond;
- b. keep a record of enquiries to inform the development of our FAQs, and quality improvement process; and
- c. ensure we have a way to acknowledge and respond to your enquiry.

Alternatively, we can be contacted via phone on +61 8 9273 3000.

If we cannot immediately take or direct your call, we will get back to you as soon as possible. Leaving us a clear message regarding the nature of your call and the best number to call you back on will facilitate that.

Email

Wherever possible and appropriate we will communicate with you via email. This will provide you with a written record of our communication and the information exchanged.

For prospective subscribers we will use the email address you contacted us from to respond to you.

For existing subscribers, we will use the email address you have provided us in your 'My Contact Details'. It is therefore important that you advise us of any changes to your email address.

We may contact you directly by email following up from a phone communication or when offering or providing support and guidance to assist you with meeting your CPD requirements.

Please note, if you are a full fee-paying AMA Member, please update your details on the Federal AMA website following sign in at <https://www.ama.com.au/sign-in>

Automated emails

Automated emails will be used to respond to enquiries sent to confirm receipt of the enquiry.

Electronic Direct Mail (eDM)

Electronic Direct Mail (eDM) will be used to send emails to all or a targeted cohort of CPD Home subscribers. These emails may be used to:

- send you our electronic newsletter
- seek your feedback on a CPD related issues
- remind you of the services and support we provide
- advise you of changes to or clarifications related to CPD Home policies, services, or fees
- advise you of relevant information pertaining to the *MBA Registration Standard: Continuing Professional Development*; and
- send notifications, information and guidance relevant to subscribers identified by our audit or reporting process as either at risk of not meeting their CPD requirements or at risk of being made a non-subscriber.

Newsletter

CPD Home will email subscribers our monthly newsletter to keep you updated on our services, available learning, and on matters impacting medical practitioners CPD.

At the start of Quarter 2, 3 and 4, the CPD Home newsletter will include a de-identified aggregated breakdown of subscribers on track or at risk. This will include compliance against the criteria

outlined in our Audit Policy, to help inform and encourage subscribers to act to keep their CPD on track.

The newsletter is key element in our communications with you, but should you not wish to receive the newsletter you can unsubscribe.

Phone call

Where we receive a call from you, we ask that you articulate the reason for your call, so that we can in a timely manner direct the call to the appropriate person to respond.

Should we need to call you back we will check with you, your location, the preferred number and time (within business hours) for the call back.

Where appropriate, we will follow up a phone call with an email as a record of our communication and the information exchanged.

We may contact you directly by phone when offering or providing support and guidance to assist you with meeting your CPD requirements.

Online Forms

CPD Home may provide online forms for existing subscribers for specific purposes, such as making a complaint, providing feedback or applying for a reconsideration, review or audit.

When you submit an online form requiring your email address, we will email you a receipt confirmation.

ePolls or eSurveys

From time to time we may invite you (by eDM and/or via our newsletter) to participate in an ePoll or eSurvey seeking your input to, or feedback on, CPD Home matters. These may include:

- our services;
- our performance;
- policy changes;
- process implementation; and
- potential improvements.

Notification of Changes

Subscribers will be advised at least six months in advance of any changes to the CPD Home Program of Learning for the subsequent CPD Year, including any changes related to:

- minimum or maximum number of hours allowed on a CPD activity;
- required domains of learning;
- new or decommissioned learning activities that will be/have been required;
- tracking or reporting processes; and
- yearly subscription fees, discount arrangements, or learning module costs.

Our aim in providing this advance notice is to ensure our subscribers experience no 'unfair disadvantage' as a result of the change.

Impending changes to the requirements of the CPD Home Program of Learning will be notified to subscribers via:

- an eDM six months in advance of coming into effect;
- the CPD Home Newsletter six three months in advance of coming into effect, with a reminder in each subsequent edition until the date of effect; and

- a What's Changing alert on the CPD Home website for viewing six months in advance of coming into effect and until the date of effect
- an alert at the top of 'My CPD Summary' following log in.

Other changes, such as the availability of new learning content, will be notified as soon as practicable and may be highlighted in the CPD Home Newsletter or, if relevant to the subscriber's scope of practice or Learning Profile, may appear in the subscriber's 'More CPD Learning' feed on their 'My Dashboard'.

Related Documents / Legislation

The following documents are related to this policy.

1. CPD Home Audit Policy
2. CPD Home Financial Hardship
3. CPD Home Reconsideration, Review or Audit Policy
4. CPD Home Complaint Policy
5. CPD Home User Terms

Appendices

1. Glossary

Version Tracking

Version	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	<p>Means CPD requirements against the Standard, as follows:</p> <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.