Data Transfer Policy

Introduction

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

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. CPD Home aims to provide a program that address a wide range of learning opportunities to meet the continuing professional development needs of its subscribers.

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.

CPD Home aims to be the choice provider of CPD home services to medical practitioners and supports their right to choose the CPD home that best meets their needs. When that is not CPD Home, or a subscriber needs to undertake learning facilitated by another CPD home provider to meet their scope of practice CPD requirements, such as high-level requirements in some specialities, we will support outgoing subscribers with the transfer of their data and evidentiary documentation.

Incoming subscribers from other CPD home providers will be able to transfer and safely import their data to ensure a seamless transition to CPD Home.

Purpose

To outline CPD Home's data transfer service and the precautions CPD Home will take when importing or exporting subscriber data.

Objective

To inform incoming and outgoing subscribers how CPD Home will facilitate the safe transfer of their professional data.

Scope

This policy applies to all incoming and outgoing CPD Home subscribers.

Definitions

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

Term	Definition
Ahpra	Australian Health Practitioner Regulation Agency
.CSV File	Comma Separated Value - A electronic file in which the data in each data field is separated by a comma

Learning Management System (LMS)	Online system used to deploy, track and report completion of learning activities measured against the CPD Program

Policy
Principles

CPD Home collects personal and professional data from individual subscribers (see our Data Management Policy). Consenting to the collection of this data is a requirement for CPD Home subscription. This data enables us:

- to support subscribers in undertaking a CPD Program of Learning relevant to their scope of practice;
- track the CPD activities undertaken and the hours spent on those activities;
- to support subscribers in meeting their CPD requirements;
- provide CPD Statement of Completion; and
- report on subscriber CPD program completions.

CPD Home is respects our subscribers right of choice. CPD Home, without prejudice, is committed to supporting any subscriber needing to transfer their data to an alternate provider.

CPD Home is committed to ensuring subscribers are empowered to safely and securely transfer their data when required.

Data extractions

To support subscribers who need to undertake learning via an alternate CPD home provider, or who choose to move to an alternate CPD home provider, CPD Home provide an encrypted CSV file of up to 7 years' worth of their data for secure transfer to their alternate provider and easy configuration and importation.

The data included in the extraction will include:

- personal details
- professional details
- written CPD Plan
- record of completed CPD activities
- accrued CPD hours
- evidence of learning completion
- CPD Statement of Completion (where available).

CPD Home will retain a copy of the outgoing subscriber's data until six months after the current CPD year. As soon as practicable after this time the non-subscriber's data will be deleted to ensure we are not holding their personal information any longer than necessary.

An extraction of the files uploaded by the subscriber as supporting documentation will also be provided to them in a zip file.

Data importations

All data received for an incoming subscriber will be scanned for any malicious content before being compiled by the AMA (WA) IT Team into compatible data sets for importation into the new subscriber's record.

Data to be imported must be provided in a CSV File with a header identifying each field of data so that the data can be mapped to the CPD Home Learning Management System.

Data transfer

Subscriber data will be downloaded to a .CSV File and, along with a copy of any uploaded supporting documents, will be sent to the subscriber by encrypted email.

CPD Home will then email the subscriber the private key for deciphering the email. The subscriber on deciphering the email can then forward the CSV file and any supporting documents to their alternate CPD Home.

CPD Home will ensure that each CSV file it provided to a subscriber will contain a header identifying each field of data to enable the data to be mapped to the alternate CPD home's system.

Data safety

Subscriber data extracted from the CPD Home system will be securely emailed to the requesting subscriber.

The subscriber will be responsible for securely sharing the provided data to their alternate CPD Home.

Monitoring data transfers

CPD Home will annually monitor, through SQL queries, the number of subscriber data records exported or imported for reporting on incoming/outgoing subscriber activity.
CPD Home will create and maintain SQL reports for monitoring data transfers.

Monitoring the exporting and importing of data will inform internal and external reporting on subscriber numbers and movements as part of CPD Home's continuous improvement activities. This information may also be used to inform accreditation submissions to the Australian Medical Council (AMC).

Roles and Responsibilities
Subscriber

The subscriber will be responsible for:

- completing and submitting a request for data download; and
- protecting any data or documents they subsequently send to an alternate CPD home.

AMA (WA) IT Team

The AMA (WA) IT Team will be responsible for:

- extracting the subscriber's data into a CSV file in response to their request;
- ensuring the CSV file contains a header identifying each field of data;
- sending the extracted data and documents via encrypted email to the requesting subscriber;
- sending the requesting subscriber the private key for deciphering the encrypted email;

- scanning any data for importation for an incoming subscriber for any malicious content;
- mapping data provided by an incoming subscriber to the CPD Home Learning Management System; and
- creation and maintenance of SQL reports for monitoring data transfers.

Related Documents / Legislation

The following documents are related to this policy:

1. CPD Home Data Management Policy.

Appendices

1. Glossary

Version Tracking

Version	Date	Comments
1.0	December 2022	
1.1	September 2024	Updated Introduction to reflect the joint ownership of CPD Home. Update Australian Health Practitioner Regulation Authority to Australian Health Practitioner Regulation Agency. Removed unrelated glossary terms.

Appendix 1
Glossary

Term	Definition
Ahpra	Australian Health Practitioner Regulation Agency
CPD Year	The CPD year is 1 January to 31 December
CSV File	Comma Separated Value - A electronic file in which the data in each data field is separated by a comma
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
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: • 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
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