



COSMETIC PHYSICIANS
COLLEGE
OF AUSTRALASIA

Policy - CPD Records Management

Policy Domain:	
Policy Area:	
Policy Author:	
Contact:	
Version:	
Approval Details:	
Effective Date:	
Review Date:	
Related Documents:	

1. Purpose

To ensure that the CPD Home consistently implements processes for CPD record storage, retention, disposal, privacy, and access and has systems and processes to allow practitioners to maintain, share and transfer their records to other CPD homes.

2. Policy statement

The CPCA is committed to implementing a systematic and consistent approach to CPD records management that aligns with privacy legislation. This includes ensuring records are:

- stored securely
- retained for an appropriate period
- disposed securely at the correct time
- available for access and maintenance by both the practitioner and CPD Home approved representative
- able to be shared or transferred to others (including other CPD Homes) at the request or control of the practitioner

Information on all these practices will be made readily available to CPD Home members with specific details about privacy available via the website.

3. Responsibility

Implementation of this policy is the responsibility of the CPD Home Committee. Activities as outlined in the procedure may be conducted by authorised representatives with all outcomes and actions reported through to the CPD Home Committee and CPCA Board (if required).

4. Scope

This policy applies to all records held in the CPD Wizard system registered to the CPD Home.

5. Procedure

Access & Maintenance

1. All CPD Home members will receive secure username / login access to the CPD Wizard program as part of their subscription.

2. Users will be able to enter in their CPD activity for the current, open CPD Program / year. This will include uploading copies of supporting documents where relevant.
 - a. Internal Activities
 - i. The CPD Home will provide an automated recording of the completion of activities from the registrations and attendance records.
 - ii. Each in house activity will have a nominated event supervisor, and a secondary backup person.
 - iii. At the completion of the said activity, the roll will be called, the identity of the participant as the person the record belongs to confirmed, the outcome of the activity recorded against the registrant and the completed register is forwarded to the CPD home management and each registrant who has completed the activity will be recorded as such.
 - iv. This will then appear on the CPD home member's record.
3. The progress of a user towards their CPD Program goals will be displayed to them via the dashboard in the CPD Wizard.
4. Users will be able to access all current and historical records of CPD activities completed on their account.

Storage & Retention

1. All records entered and documents uploaded will be stored in the CPD Wizard database, which will only be accessible by the member through login or the CPD Home representative for support and reporting purposes.
 - a. The records database is maintained by CocoNet with all documents stored and backed up to external servers.
 - b. The platform is backed up on a series of revolving servers located in Australia with substantial cyber security. Records are encrypted within the platform.
2. All CPD Program records will be maintained by the CPD Home while the member remains financial.
 - a. Access to three previous years (triennium record) is present and years prior to that can be supplied upon request.
3. Once a CPD member is no longer financial or a registered member of the CPD Home records will remain available for access via login for 12 months. No additional records will be able to be entered.
 - a. This allows time for the member to download or make copies of any records for them to transfer to a new CPD Home.
 - b. Cessation of CPD home may occur as a result of:
 - i. Retiring member
 - ii. Member is deceased
 - iii. Registration status change to non-practising for the period of 7 years of last entry
 - iv. Transfer of CPD records to an alternative CPD home
 1. The responsibility of recording, storing, and retaining copies of own CPD records in the case of force majeure, catastrophic circumstances that leads to total loss of CPD records is preserved by the CPD Home member.
4. After 12 months the CPD Member will be notified that their access will be terminated and will be provided with options for how to obtain copies of their records for transfer.
5. The records will then be securely maintained / stored for a period of 3 years before archiving.

Share & Transfer

1. **While a user is active, they can login to their account and download any entered records and communications.** These downloaded records can be provided to another party or CPD Home as the member sees fit.

2. Practitioners who are no longer active or unable to complete the download of records themselves may request, in writing, the CPD Home at any time to provide them with a copy of all records (within the specific practitioners account)
 - a. The acknowledgement of this request will be sent via email and will include a maximum action time frame. This time frame on average will be 14 days, however it may be longer depending on the specifics of the request made.
 - b. The format and process for provision of requested records may also be dependent on the request made. Where possible, the format will be via zip file on a file share platform, such as OneDrive or similar.
3. At the written request of the practitioner, the CPD Home will provide copies of records to a third party.

Disposal

1. Archived records will be maintained for a period of 7 years.
2. After the storage period has passed records may be destroyed or deleted.
3. This process will be completed by the CPD Home with the support of CocoNet.
4. All records scheduled for disposal will be reported to the CPD Home to allow time for any notifications of holding to be raised. Once approved the disposal process will be completed.
5. Practitioners will be notified at least 30 days before the disposal of records to allow a final opportunity for transfer.

Incoming / Outgoing Members

1. At the end of each CPD reporting year, or more frequently if required by the CPD Home Committee, the CPD Home Administrator will produce a report that tracks the members who have left the Home and the members who have joined the Home.
2. All leaving members will be asked to complete a CPD Home Stakeholder Feedback Form.
 - a. This will be used to monitor effectiveness of the program for continuous improvement
3. Monitoring the incoming vs outgoing numbers will allow the home to also make decisions on other infrastructure and management / staffing needs.

Privacy

1. All records will be maintained in alignment with The Privacy Act 1988 (Privacy Act) which protects the handling of personal information about individuals. This includes the collection, use, storage, and disclosure of personal information in the federal public sector and in the private sector.

5. Supporting Documents / Systems

- CPD Wizard
- Privacy Policy
- Privacy Statement (for Website)
- CocoNet Service Agreement
- CPD Home Stakeholder Feedback
- The Privacy Act 1988

6. Review

This policy will be reviewed no less than annually at the time of use to ensure it remains fit for purpose.

7. Version Control

Version	Date	Changes Made	Approved By

DRAFT	11/09/2022	New document created	