

ACAM Data Management Policy

**POLICY NUMBER/
REFERENCE:** 15-250723

POLICY TITLE: Data Management Policy

POLICY STATEMENT:

ACAM CPD Home membership is available to non-exempt medical practitioners in Australia at www.acam.org.au. It is not limited to members and fellows of ACAM but is open to those whose academic and clinical practices are aligned with the Australasian College of Aesthetic Medicine.

Objective

To outline how ACAM CPD Home:

- complies with Australian data protection law and follows good practice;
- protects the rights of members, fellows, subscribers, office staff and course merchants;
- is transparent about what ACAM stores and processes individuals' data;
- and describes how ACAM protects itself from the risks of a data breach;
- and, demonstrates how ACAM is adequately insured in the event of data breach.

DEFINITIONS:

Background

ACAM CPD Home is committed to maintaining the accuracy, availability, integrity, and confidentiality of all the data it collects, stores, and utilises in conducting its business operations as a CPD Home. This included the provision of CPD services to its subscribers, members, and fellows, as well as meeting its obligations as an accredited CPD Home.

ACAM CPD home collects a range of data about individuals and organisations with whom it does, or may do, business with. It collects this data to:

- support subscribers to meet their CPD requirements;
- make strategic decisions about its operations, educational and membership management;
- improve its education, member benefits and services;
- create the knowledge to undertake informed decisions about available educational content; and
- meet its reporting requirements to the, Medical Board of Australia (MBA); Australian Medical Council (AMC); and The ACAM Board



Purpose

The purpose of this policy is providing guidance and direction on the management of ACAM CPD Home data collection and management throughout the information lifecycle as well as demonstrating how ACAM CPD Home complies with the current laws, policies and confidentiality.

Scope

This policy applies to all subscribers, course merchants, contractors, and employees of ACAM CPD Home.

PROCEDURES:

Data Governance

ACAM CPD Home aims to manage our data assets securely, safely, effectively, and efficiently. With a focus on continuous improvement, the Data Management Committee contributes to decisions on the collection and management of data, proactively defines data rules, resolves data issues, and fosters an organisational approach to data handling.

Data Management Committee

The Data Management Committee reports to the Association Manager and ACAM board.

The Committee consists of the following:

- Association Manager (also Data Protection Officer)
- IT Manager and Web Project Lead
- Project Lead and Medical Education Officer
- And will include Business Unit Heads including the Association Manager.

Management

What we collect

ACAM CPD Home will only collect information and data relating to individuals or organisations it does or may do business with. Or those businesses and individuals that its directly related to or as reasonably necessary for one or more of the ACAM CPD Home functions or educational activities.

The types of information the ACAM CPD Home will typically collect:

- name(s), postal and street addresses and phone numbers;
- identifying information such as date of birth
- email addresses;
- bank account or credit card details (for subscriber or learning provider payments);
- professional details, including type of professional qualification, career stage (i.e. in training, specialisation completed);
- AHPRA registration number;



- scope of practice, clinical or to other position, work setting (i.e. private practice, hospital setting), areas of education and future educational aims, completed and undertaken CPD activities and certification or documentation relating to CPD activities;
- PLAN professional develop plan and learning reflections;
- details of service and learning purchases, including learning module completions and views;
- ACAM membership status;
- complaints, disputes and other data relating to matters;
- information and requests for special consideration, or exceptional circumstance consideration in relation to CPD;
- web-based interactions including IP addresses and utilised device information for as well as date and time of web or email interactions.

Why we collect it

We collect this information to:

- maintain up to date records concerning CPD subscribers and course merchant providers;
- to communicate effectively with members, fellows, subscribers, course merchant providers and governing bodies to meet the CPD Homes reporting obligations (i.e. AMC, MBA);
- to provide supporting evidence analysis service delivery, improvement and provision of services to subscribers, to coordinate and manage staffing activities and load; and
- to provide transparency for delivery of activities, CPD Home management and expenses.

Uses and conditions for processing.

CPD Home processes data as outlined in the following examples: Outcome/Use	Processing required	Data to be processed	Conditions for processing	Evidence of lawful basis
Outcome/Use	Processing required	Data to be processed	Conditions for processing	Evidence of lawful basis
Newsletter	Quarterly monthly email mailout of newsletter	Email Mail Merge (Informz) name and email address from subscriber database	Consent – implied unless advised otherwise.	Subscribers can unsubscribe from newsletter. Date of ceasing subscription and reason for

				recorded on subscriber file.
Audit Report	Quarterly primary and secondary audits reports run of CPD activity	Report on subscribers: <ul style="list-style-type: none"> • Presence of a personal development plan • Hours of CPD activity record 	Consent - implied	Signed on as a subscriber
Notifications	Quarterly email mail merge	At risk subscribers as per Audit policy identified by audit report and an email using those names and emails. Notification reflects the failed parameters as per Audit Policy	Consent - implied	Signed on as a subscriber. Subscribers can unsubscribe from CPD Home. Date of ceasing subscription and reason for recorded on subscriber file.
Personal contact	Inactive at-risk subscribers phoned	Secondary audit report identifies no activity in response to notification email	Consent – sought at time of contact	Date and time Recorded in subscriber file
CPD Statement of Completion	4th quarter audit report identifies compliant subscribers	Presence of written CPD Plan including goals reflection, and 100% of required CPD Hours completed	Consent - implied	Signed on as a subscriber
Applications for special consideration	Application received and put to CPD Advisor Panel for	Reasons for special consideration	Consent - implied	Application received
Outcome/Use	Processing required	Data to be processed	Conditions for processing	Evidence of lawful basis
<i>Consideration given</i>				



Granting an exemption, variation, or deferral	Notification of request outcome	Correspondence to subscriber using their name and address. Populating data field in subscriber record to indicate an exemption, variation or deferral	Consent - implied	Application received
Complaints	Record date, time and nature of complaint	Correspondence to subscriber Name and email address Population of Data Complaint Register	Consent - implied	Complaint received

How we collect it

- Most of the information collected will be provided directly by the subscriber or the course merchant provider engaging engage with ACAM CPD Home either as a subscriber, member or fellow or the course merchant dashboard.
- Subscribers will be required to create a personal account with the ACAM CPD Home requiring an alpha-numerical password (minimum 7 characters, including at least one letter and number),
- All communication be screened to ensure they are not spam or scam, and will be advised that in joining the ACAM CPD Home they accept the ACAM CPD Home terms and conditions, new subscribers will also be directed to the ACAM privacy policy.
- Subscribers who are ACAM members or fellows will be able to login in to CPD Home using their ACAM log in.
- ACAM CPD Home may collect personal information indirectly via publicly available sources such as social media, websites, directories and databases.
- In addition, personal information may also be collected indirectly while providing a service or during the management of a complaint. This personal information may include information provided by authorised representatives of an individual; previous CPD activity supporting documents; from CPD Home staff or other service providers; regulatory bodies authorities and bodies, professional or specialist societies or associations.



Consent

Subscribers, members, fellows and course merchant providers have the choice to engage or not engage with CPD Home. If they choose to engage they are implicitly consenting to ACAM CPD Home collecting and utilising their personal and professional information for the purposes outlined above.

Anonymity and pseudonymity

There is no option of anonymity and pseudonymity for ACAM CPD Home subscribers, members, fellows or course merchant providers. It is impractical for ACAM CPD Home to operate and meet its reporting and obligations without knowing for whom it is providing a CPD Home service.

Storage

- ACAM will retain member and users' personal information for five years upon membership becoming inactive. All data will be kept securely stored in Sydney, on the cloud at Amazon Web servers' level S3 simple service where all additional membership, subscription, data records and other personal information will be kept.
- Subscribers, members, fellows and course merchant provider information is stored by way electronic systems based in the Cloud under our control and password protection.
- ACAM's has taken appropriate steps to protect the security of the information it holds, including protections against unauthorised access, viral or other electronic intrusions, fire, theft or loss.
- We require any contracted providers of IT services to do the same.
- Our contracts with contracted providers of IT services require them to protect the privacy of your information when held on either their servers and/or the Cloud. Our contractors are also required to comply with the Privacy Act 1988 (Cth);
- In addition, ACAM carries data breach insurance policy.

Management and retention

- All personal information collected by CPD Home is managed in a responsible and secure manner, in compliance with the *Privacy Act 1988*.
- ACAM generally keeps your personal information active for as long as is reasonably required to enable ACAM to meet your needs and our obligations as a CPD Home.
- When a subscriber lapses to a non-subscriber status, all the information that ACAM CPD Home holds about them will be no longer accessible from 1 July the year following the CPD year in which the individual ceased to be a subscriber.
- ACAM keeps subscriber, members and fellows records and other personal information on file to enable ACAM to undertake statistical and historical analysis and reporting.
- As part of our data security, we fully backup and archive our electronic databases weekly, with a Point-in-Time snapshot taken every day.



Access to personal information

- All subscribers, members and fellows (current and former), ACAM representatives and representatives of course merchants can access what personal information we hold about them by contacting the CPD Home team by email: notification@acam.org.au;
- All subscribers, members and fellows will be able to download a record of their individual CPD activities for a CPD Year.
- This information will be archived each year at six months (December of each year) from the end of each CPD Year and retained for up to 7 years.
- Only authorised CPD Home representatives will have access to subscriber's, members and fellows personal information where that access is necessary for the provision of ACAM CPD Home services. For example, when supporting a subscriber at risk of not meeting their CPD requirements.

Correcting personal information

- ACAM CPD Home subscribers, members and fellows can easily update their information by visiting www.acam.org.au or by contacting the ACAM CPD Home team by email: MEofficer@acam.org.au;
- ACAM CPD Home will update and replace contact details for representatives or staff of course merchant providers as advised.

Disclosure of personal information

- ACAM CPD Home will not disclose personal information without an individual's express written consent except:
- when personal information is required to facilitate access to required high-level learning,
- when personal information is required reporting subscriber, member or fellow compliance with the ACAM CPD Home Program to the MBA; and
- where required by or authorised to do so under a governing state, territory or federal law.

Sensitive information

- Aside from identifying if a subscriber, member or fellow is a member of ACAM for accessing discounted rates on ACAM CPD Home courses, ACAM CPD Home does not routinely collect any sensitive information about its subscribers, members or fellows or course merchant providers representatives.
- Where sensitive information may be provided to ACAM CPD Home by the subscriber, member or fellow themselves, course merchant representative, or their authorised representative of the subscriber, member, fellow or course merchant representative (such as when applying for special consideration, exceptional circumstances) all information and data will be treated confidentially and will only be retained for as long as is necessary.



Unsolicited information

- No unsolicited personal or sensitive information about another individual will be retained by ACAM CPD Home.
- Should ACAM CPD Home receive unsolicited personal or sensitive information about an individual, the Data Protection Officer will assess if ACAM CPD Home could have collected the information if it had solicited it.
- If the Data Protection Officer ascertains that the data could have been collected via the ACAM CPD Home, it will notify the individual concerned in line with ACAM protocols.
- Where the ACAM CPD Home is not the source, the information will be at a minimum de-identified, redacted, or as lawful and reasonable to do so, destroyed.

Communications and Direct marketing

- ACAM CPD Home will use personal information collected from subscribers, members and fellows and course merchant provider representatives to contact them:
- where, as a subscriber, member of fellow or course merchant representative they are at risk of not completing their ACAM CPD requirements;
- and to keep them informed about ACAM CPD Home services, products, events and publications;
- and, to survey subscribers, members, fellows and course merchant providers to inform them about ongoing improvements to ACAM CPD Home offerings and services.

Other than for communications which ACAM CPD Home may be legally required to issue, or which are required as per our obligations as an accredited CPD home to communicate to subscribers, members, fellows or course merchant providers will have the ability to unsubscribe from the communication if they no longer wish to receive such information. Upon unsubscribing, the individual will be asked to indicate their reason for unsubscribing to help inform quality improvement efforts and a confirmation email will be sent.

Data sharing and cross-border disclosure

- ACAM CPD Home will not sell or license your information.
- ACAM CPD Home may from time-to-time report on the operations, services and activities of the ACAM CPD Home to other committees or organisations associated with ACAM. All reports will utilise de-identified and aggregated data only.
- Where an ACAM CPD Home subscriber, member or fellow undertakes course or education with one of our certified course merchant providers ACAM will notify the course merchant provider so they can for example issue a certificate of completion.
- Where a subscriber signs on to ACAM CPD Home via the ACAM website their details will be verified.

ACAM CPD Home in line with its reporting requirements as an accredited CPD Home will provide compliance reports on ACAM CPD Home subscribers to the MBA. At a minimum



this report will include the subscriber's AHPRA number and a status indicator of "compliance".

Use of government related identifiers

CPD Home when reporting on subscriber compliance to the MBA will utilise the subscriber's AHPRA Number (as provided by the subscriber) to identify them to the MBA.

Security measures

- Subscriber information is accessible to individual subscribers via their password protected login.
- Subscribers are responsible for maintaining the security of their password. Passwords:
- cannot contain the user's account name or parts of the user's full name that exceed two consecutive characters
- must be at least eight characters in length
- must contain characters from three of the following four categories:
 - English uppercase characters (A through Z)
 - English lowercase characters (a through z)
 - base 10 digits (0 through 9)
 - non-alphabetic characters (for example, !, \$, #, %)
- Use of and access to subscriber, member and fellow information is restricted to authorised ACAM CPD Home representative, such as the ACAM CPD Home Medical Education Officer. ACAM CPD Home representatives are required under their conditions of contracts to be aware of and comply with ACAM's privacy policy and procedures.
- Multi-factor authentication is utilised across all data and systems access points.
- ACAM CPD Home data is securely stored in the Cloud using best practice security standards. ACAM also maintains firewalls for itself.
- All incoming emails and attachments are scanned for any malicious content. ACAM CPD Home representatives are also provided with regular security awareness training to prevent any compromise to our systems through cyber-attacks of any kind.
- The data ACAM hold's in ACAM's electronic databases is fully backup and archived weekly, with a Point-in-Time snapshot taken every day to facilitate any required data restoration. ACAM blocks access to the ACAM CPD Home system from malware and unauthorised overseas IP addresses.

ACAM CPD Home is required to email personal (including any sensitive) information or confidential information we will encrypt and password protect the email to ensure the security of its contents.

As per our Data Breach Response Plan anyone who collects, accesses, maintains, distributes, processes, protects, stores, uses, transmits, disposes of, or otherwise handles personally identifiable information or Protected Health Information (PHI) of ACAM CPD Home subscribers, members and fellows is required to notify Association Manager if they know or



suspect there has been a data breach. See our Data Breach Response Plan for our process on handling a data breach.

Automated processes

ACAM CPD Home will use automated processes for Monitoring subscribers' compliance with their CPD requirements. Notifying 'at risk subscribers' via a pre-populated email identifying:

- whether a CPD Plan is in place;
- how many hours of ACAM CPD activity have been completed within one CPD year;
- percentage (%) of recorded activities for which supporting documentation has been uploaded along with:
 - reminder of obligations under the ACAM CPD Home Program;
 - required action; and
 - contact details for the ACAM CPD Home Support Officer; and
 - reporting subscribers' compliance to the MBA
 - transferring subscriber, members or fellows data upon moving to a new CPD Home
 - reporting number of incoming and outgoing subscribers, members and fellows.

The integrity of automated notification emails will be randomly audited by the ACAM CPD Home representative before each mailout.

Data transfer

ACAM CPD Home subscribers, members and fellows with multiple scopes of practice may need more than one CPD home to meet their MBA CPD requirement. To meet the needs of these subscribers ACAM CPD Home provides a data import and export service to facilitate the transfer of a subscriber's details and CPD records from one CPD home provider to another.

Outgoing subscriber

Subscriber, member and fellow data upon request of the office arrange exporting to a CSV file for easy configuration and importation by an alternate CPD home. The data extraction including the individual's:

- name
- AFPRA number
- professional details
- written professional development plan (PLAN)
- record of completed CPD Activities
- accrued CPD Hours
- CPD Statement of Completion (where available).



An additional extraction of an individual's uploaded supporting documentation is also available upon request to the Medical Education Officer. The .CSV file, along with a copy of any uploaded supporting documents, will be sent to the subscriber by encrypted email.

Incoming subscriber

Data received for an incoming subscriber is scanned for any malicious content before being compiled into compatible data sets for importation into the new subscriber's record upon request.

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. Please also refer to our Data Transfer Policy.

Roles and Responsibilities

Data Protection Officer

ACAM CPD Home's Data Protection Officer (DPO) is Ms Purich secretary@acam.org.au

The DPO is tasked with:

- informing and advising the ACAM association management and board and CPD Home representatives of data protection issues and risks, and of their obligations under the Privacy Act 1988;
- documenting, maintaining and developing the organisations data protection policy and related procedures;
- embedding ongoing privacy measures into corporate policies and operational activities throughout ACAM CPD Home and within each business unit that processes, accesses, or utilises personal data;
- monitoring compliance with the Privacy Act 1988, including managing internal data protection activities, advising on data protection impact assessments; training staff and conducting internal audits;
- checking and approving contracts or agreements with third parties that may handle ACAM CPD Home sensitive data; and
- being the first point of contact for supervisory authorities and for individuals whose data is processed.

IT Manager

The IT Manager is responsible for:

- ensuring all systems, services and equipment used for storing data meet acceptable security standards;
- performing regular checks and scans to ensure security hardware and software is functioning properly; and
- evaluating any third-party services ACAM CPD Home is considering using to store or process data to ensure their compliance with obligations under the regulations.



CPD Home Support Officer

The CPD Home Support Officer will be the Medical Education Officer in addition to their responsibilities as ACAM CPD Home representative will:

- randomly audit automated notification emails to check their integrity prior to any mailout;
- keep a record of the audit, including audit date, number audited, audit results and any remedial action required.
- Action requests from subscribers, members and fellows upload and download their CPD information into a .csv file.

ACAM CPD Home Staff

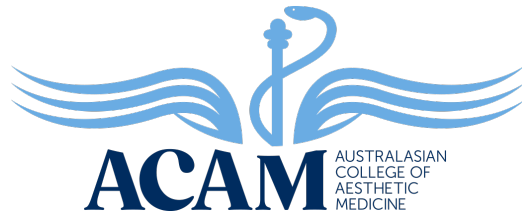
Our representatives are responsible for:

- undertaking ACAM CPD Home provided training around data, security and privacy protection;
- abiding by the ACAM CPD Home's security protocols;
- using the email address and or mobile number provided by the subscriber for interactions with ACAM CPD Home; and
- except where required as a ACAM CPD Home function or by law, not disclosing any personal information of a subscriber, member or fellow or learning provider representative to another person, entity, or organisation without their express consent.

Subscribers, members and fellows

Each subscriber, member and fellow is responsible for:

- providing or creating a login name and password;
- securing and managing their password to the ACAM CPD Home page;
- all activities that occur under their login name;
- accurately providing within the ACAM CPD Home page there:
 - personal details in their profile
 - payment details in their profile;
 - ensuring the de-identification of any patient in any clinical audit reports;
 - ensuring that any third party named in any peer review documentation relevant to a CPD activity is aware the document will be uploaded to your record in the ACAM CPD Home page;
 - immediately notifying ACAM CPD Home of any unauthorised use of their login name or any other breach of security;
 - the security of any data provided to them for transferring to an alternate CPD Home;
 - not using the ACAM CPD Home page as the sole repository of their ACAM CPD information; and
 - regularly printing their ACAM CPD Statement of Completion (when available) and/or downloading their My CPD Report and saving the .zip file to their personal files for each ACAM CPD Year.



Compliance

CPD Home has the following measures in place to ensure and demonstrate compliance with the *Privacy Act 1988*:

- ACAM Privacy Policy - available on ACAM CPD Home website
- Subscriber User Terms – available on ACAM CPD Home website
- Data Breach Response Plan.

Related Documents / Legislation

The following documents are related to this policy.

AMENDMENTS/REVIEW:

‘Review or Amended by the Management Committee (23 July 2023)’

‘Endorsed by Management Committee (31 July 2023)’

RELATED DOCUMENTS

1. ACAM CPD Home Privacy Policy
2. ACAM CPD Home Data Breach Response Plan.
3. Glossary of Terminology

REFERENCES:

[The Privacy Act 1988](#)

File: ACAM Policy and Procedural Manual/Policy Manual Complete/Updated Policies/ACAM Data Management Policy 15-250723

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