# HETI CPD HOME

# RECORDS MANAGEMENT: PROCESS STATEMENT

## 1  INTRODUCTION

HETI CPD Home is a new portal which collects, tracks and reports member CPD data. It is part of the broader HETI IT infrastructure and is subject to the same enterprise level policies and procedures as other systems.

## 2  PURPOSE

This process document describes how the Guidelines for Records Management at HETI will be implemented at program level and provides parameters for data storage, transfer and disposal for member CPD records.

## 3  SCOPE

This process document relates only to the HETI CPD Home portal and not to any other HETI or NSW Health program or system.

## 4  DATA GOVERNANCE AND PRIVACY

Governance of HETI systems is the responsibility of the Corporate Support and Business Partnerships Portfolio. Information Services will be responsible for:

- Security
- Technical support
- Software updates
- Liaison with the developers for any enhancements

As part of NSW Health, HETI CPD Home is subject to a number of policies relating to records management, including:

- NSW Health Cyber Security Policy
- HETI Privacy Policy
- HETI Records Management Guidelines (see Appendix 1)
- Guidelines for Protected Records and Dissemination Limiting Markers at HETI
- NSW Standard on Digital Recordkeeping
- NSW State Records Act 1988 as administered by State Records NSW

# 5  DATA COLLECTION

HETI CPD Home only collects enough data to identify and communicate with members about CPD matters, and to fulfil regulatory reporting requirements. It also uses CPD data for tracking progress against CPD requirements, offering assistance for those at risk of non-compliance, for audit and for evaluation purposes.

Personal information will be provided by members at registration and includes:

- Name
- Contact details – phone and email address
- AHPRA registration number – to determine eligibility and for reporting purposes to MBA
- Stafflink ID – to determine eligibility
- Postgraduate Year level – to determine eligibility
- Initial CPD data – activities completed prior to signing up with HETI CPD Home as well as supporting documentation will be logged and uploaded by members

Throughout the year, it is expected that information pertaining to CPD activities and supporting documentation will continue to be logged and uploaded by members and collected by HETI CPD Home.

HETI CPD Home may also collect the following information:

- Feedback in the form of surveys to inform program evaluation
- Information relating to reconsiderations, reviews and appeals
- Information relating to complaints
- Information about whether a member has been granted/ refused an exemption or variation
- Detailed and summary reports from audits

HETI CPD Home will not store credit/ debit card information.

# 6  DATA ACCESS

Access to member CPD records is restricted:

- Members can view, edit and download only their own records.

- Only HETI CPD Home staff and IT managers have access to the portal. Records will not be available to all HETI staff. Admin user logins will be personalised to HETI CPD Home staff.

- Records will not be shared by HETI CPD Home with other HETI or NSW Health programs unless requested by the CPD Home member.

# 7  SECURITY

Security is managed by HETI in accordance with the *HETI Data Management Guidelines* and *NSW Health Cyber Security Policy.*

A *HETI CPD Home* data breach response plan is outlined in the HETI Business Continuity Plan.

Members are responsible for protecting the secrecy of their passwords and system access to the HETI CPD Home.

## 8  CONSENT TO USE OF DATA

As a condition of joining, members consent to the use of their CPD information to inform tracking mechanisms, program management and governance, communications, audit, evaluation and reporting.

HETI CPD Home will not share your personal information with other members or LHDs. It will only share the minimum necessary information required to fulfil its reporting obligations to regulators.

## 9  RETENTION AND TRANSFER

HETI CPD Home will retain member CPD records for the duration of their membership and until six months after the end of the CPD year in which a member cancels their subscription, subject to any applicable requirements in the State Records Department Guidelines.

A yearly compliance report will be submitted to the MBA to certify whether or not members have satisfied CPD requirements. The information submitted will be the minimum required to comply with MBA requirements.

When a membership is terminated, HETI CPD Home will provide a full download to the member of their CPD records. The member is responsible for retaining these records and uploading them to their new CPD home.

## 10  DISPOSAL

Upon transfer (and confirmation of transfer) of the records to a member who has cancelled their subscription, HETI CPD Home will delete the record in June of the year following cancellation, subject to any applicable requirements in the State Records Department Guidelines. This will assist ex-members in case they lose or misplace records during transition to a new CPD home in the event they are audited by the Medical Board of Australia.

HETI CPD Home will delete records immediately after transfer to a cancelling member if the member requests this action in writing.

## 11 RELATED POLICIES

As part of NSW Health, HETI CPD Home is subject to a number of policies relating to records management, including:

- NSW Health Cyber Security Policy
- HETI Privacy Policy
- HETI Records Management Guidelines
- Guidelines for Protected Records and Dissemination Limiting Markers at HETI

- NSW Standard on Digital Recordkeeping

## 12 CONTACTING HETI CPD HOME

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