PROVISION OF EVIDENCE GUIDELINE – 2021-23 CPD CYCLE

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1.   INTRODUCTION

These guidelines have been made pursuant to the ACEM Continuing Professional Development (CPD) Participation policies to **provide guidance** on the nature and type of documentation to be uploaded for the purposes of meeting CPD audit requirements.

Your evidence will need to verify:

Hours-based activities:	Procedural Skills activities:
• your **participation** in the activity, and • the **duration** of the activity (for hours-based activities), and • the **date(s)** the activity occurred (month and year)	• your **participation** in the activity, and • the **mode** of the procedural skill (i.e. performed, taught or supervised), and • the **date(s)** the activity occurred (month and year)

The evidence provided must align with the activities entered in your CPD record in *My ACEM*. If there is a discrepancy between the evidence provided and the activities recorded, you will be asked to provide further evidence or your record may be modified to align with the evidence provided.

Please note that:

1.   **Patient and/or colleague identity and confidential information must be excluded from all evidence.**

2.   You **are not** required to record or upload evidence of most College activities, or those activities with ACEM CPD Activity Approval. The College records participation in these activities on behalf of members. For instance, if you have:

    2.1.   participated in a face-to-face or teleconference/video-conference College activity (for example meetings, examinations etc);

    2.2.   registered for and attended a College event (for example the Annual Scientific Meeting);

    2.3.   conducted trainee Workplace-based Assessments (WBAs) (i.e. ITA, DOPS, CbD, Mini-CEX, Shift Report, LNA) within the *My ACEM*;

    2.4.   you have completed ACEM online educational resources;

    2.5.   participated in an ACEM CPD Approved Activity (for example SMACC) and you have submitted your ACEM identification number to the activity Provider. In the case whereby you have not identified yourself as an ACEM member and provided your ACEM identification number, then this activity may not have been recorded on your behalf.

3.   You **are** required to upload evidence of College activities in the following circumstances:

    3.1.   you have participated in a College activity where an ACEM staff member is not present to verify the amount of time spent on the activity (for example: online committee work, site accreditation preparation);

4.   In the case of audit, you may be asked to submit further evidence verifying the information recorded in your CPD record, such as:

    • a letter from an appropriate authority (i.e. DEM, DEMT, senior FACEM, Administrative authority), that must be on letterhead, signed and dated from a person or persons who had either oversight of your work or participation in the relevant activity, and can verify the date(s), Activity Type and duration (if hours-based).

        or

    • a Statutory Declaration (for procedural skills only)

5.   All non-English documents submitted as evidence of CPD activity must be translated into English by an accredited interpreter.

6.   For the purpose of an ACEM CPD audit, and to meet requirements set by the applicable regulatory body, CPD participants must retain evidence of all CPD activities for a minimum of five (5) years.

7.   The following lists (refer sections 2 to 5 below) are a **guide** of the types of evidence required for a CPD record audit, set by the CPD Committee. However, all audits are conducted on a case-by-case basis and additional evidence may be requested.

2.   EDUCATIONAL ACTIVITIES

Activity Type	Examples of evidence
Group discussions participation *e.g. Balint group, Informal group discussion, Journal Club*	In the *Activity comments* field record: • name of discussion group; and • discussion date(s); and • location of group meeting(s). or Upload a logbook/record containing the above information.
Lectures, seminars, grand rounds attendance etc.	Upload a letter from the activity organiser on letterhead certifying your role, duration and date(s). or Upload both of the following: • event program; and • verification of attendance (e.g. certificate of attendance, registration receipt etc.)
Online group learning *e.g. blogs, forums, discussion threads, journal clubs, webinars, videoconferences, social media discussions via Twitter, Facebook LinkedIn*	In the Activity *comments* field record: • the type of social media; and • discussion topics. or Upload a logbook/record containing the above information.
Online educational activity - Podcasts, e-learning modules, medical questions etc.	In the Activity *comments* field record: • name of online educational activity (e.g. FOAMed, LITFL etc.) or Upload a logbook/record containing date(s), duration and name of online educational activity. or Upload a certificate of completion.
Online educational activity – Webinars, online workshops	In the Activity *comments* field record: • name of online educational activity (e.g. etc.) and Upload confirmation of registration containing date(s), duration and name of webinar. or Upload a certificate of participation.

Activity Type	Examples of evidence
Scientific meetings, conferences	**ACEM scientific meetings, conferences:** ACEM activities will be recorded, and evidence provided on your behalf. Please check your records. **ACEM approved scientific meetings, conferences:** ACEM approved CPD activities will be recorded, and evidence provided on your behalf. Please check your records. **Non-ACEM scientific meetings, conferences:** Upload both of the following: - verification of attendance (e.g. Minutes of meeting, certificate of attendance); and - event program or meeting agenda, including duration. or Upload a letter from the meeting/conference organiser on letterhead certifying your attendance at the meeting/conference including duration and date(s).
Workshops and courses *e.g. Clinical supervision, communication skills, cultural safety, health advocacy, leadership and management, medical expertise, mentoring, prioritisation and decision making, procedural skills based, professionalism, scholarship & teaching, teamwork and collaboration*	**ACEM workshops:** ACEM activities will be recorded, and evidence provided on your behalf. Please check your records. **ACEM approved workshops:** ACEM approved CPD activities will be recorded, and evidence provided on your behalf. Please check your records. **Non-ACEM workshops**: Upload both of the following: - event program; and - verification of attendance (e.g. certificate of attendance). or Upload a letter from the workshop/training organiser on letterhead certifying your attendance at the workshop/training including duration and date(s).
Presentation and facilitation *e.g. Academic meetings, ACME course facilitator, conferences, EMET teaching, hospital department meeting, training, workshops etc.*	**ACEM presentation and facilitation:** ACEM activities will be recorded, and evidence provided on your behalf. Please check your records. **ACEM approved activities:** ACEM approved CPD activities will be recorded, and evidence provided on your behalf. Please check your records. **Non-ACEM or unrecorded ACEM approved activity:** Upload event program including your name, the date (s), and session(s) duration. or Upload letter from the activity organiser on letterhead certifying your role, duration, and date(s).
Formal Study *e.g. short courses*	In the Activity comments field record: All of the following: - confirmation of enrolment (including provider name); and - course/subject details; and - if complete, certificate of completion.

Activity Type	Examples of evidence
Postgraduate *e.g. Post graduate certificate/short course, post graduate degree (Diploma, Masters, PhD)*	Upload all of the following: • confirmation of enrolment (including provider name and date of enrolment); and • course/subject details, date(s) and duration; and if complete, certificate of completion.
Reading *e.g. ACEM materials (guidelines etc.), articles, journals, medical healthcare news articles, medical textbooks, review of literature etc.*	In the Activity *comments* field record: • Name of publication(s) or articles. 　or Upload subscription receipt for journal. 　or Upload a logbook/record containing date(s), duration and name of reading material(s). 　or Upload a copy of literature review, clearly dated or a list of the articles reviewed.
Supervision – Assessment and Feedback *e.g. Direct observation of procedural skills (DOPS), In-training assessment (ITA), mini clinical exam (Mini CX), review trainee progress, SIMG assessment, structured interview, structured references, trainee learning needs analysis (LNA), trainee shift report, work-place based assessment (WBA)*	**ACEM assessment and feedback:** ACEM activities will be recorded, and evidence provided on your behalf. Please check your records. *In the first instance, evidence of the activity will be sought on your behalf by College staff however you may be required to submit further evidence.* **Non-ACEM assessment and feedback:** Upload a de-identified copy of the assessment. 　or Upload a letter from the DEM on letterhead certifying your role in assessment(s) including date(s) and duration.
Supervision - Examinations *e.g. Invigilator or observer, practice exam, site organiser, trial/mock exams*	**ACEM examinations:** ACEM activities will be recorded, and evidence provided on your behalf. Please check your records. **ACEM Approved activities:** ACEM activities will be recorded, and evidence provided on your behalf. Please check your records. **Non-ACEM examinations:** Upload a letter from the examination organiser on letterhead confirming your role in the examination, date(s) and duration.
Supervision - Mentoring *e.g. coordinating a mentoring program, developing a mentoring program, meeting with mentees*	Upload the proposal to implement a mentoring program. 　or Upload the program evaluation. 　or Upload a logbook/record outlining date(s) and duration of meetings with mentee(s). 　or Upload a letter from the DEM or equivalent authority on letterhead certifying your role, duration and date(s).

Activity Type	Examples of evidence

Teaching
 	
e.g. Bedside teaching, emergency medicine tutorials, grand rounds.
	Upload a document noting the following:
	• date(s); and
	• location(s); and
	• details of the session(s)
	   or
	Upload a letter from the DEMT, teaching coordinator or event organiser on letterhead certifying your role, date(s) and duration.
	   or
	Upload a teaching schedule clearly identifying your role, date(s) and duration of teaching.
	   or
	Upload copy of the presentation, session plan or short outline of the program, identifying you as the author, the date(s), and duration.

Preparation *e.g. Clinical trial, grant application, mentoring program, presentations, proposal, session plans etc.*	Upload both of the following: • copy of any presentations, session plans, grants etc.; and • documentation showing evidence of your involvement, the date(s) and duration.

Peer Discussion
 	
e.g. Academic Meetings, Mentor/Mentee Meetings
	ACEM meetings:
	ACEM activities will be recorded, and evidence provided on your behalf. Please check your records.
	
	Non-ACEM meetings:
	Upload minutes of meeting including your name as participant, date and duration of activity.
	   or
	Upload a certificate of attendance.
	   or
	Upload a letter from the meeting organiser on letterhead certifying your participation, the date(s) and duration of the meeting/activity.
	
	Mentor/Mentee meetings:
	Upload a logbook/record outlining date(s) and duration of meetings with mentor/mentee(s).

Review of Guidelines e.g. ACEM Materials	Upload the following: • copy of the guidelines developed; and/or • evidence of your involvement (e.g. meeting minutes, correspondence between developers, letter from lead developer or DEM on letterhead).

Activity Type	Examples of evidence

Research
 	
e.g. Adjudicating trainee research paper, conducting, reviewing, survey development
	ACEM research:
	In the Activity comments field record:
	• name of the research project; and
	• summary of your role in the review/adjudication
	In the first instance, evidence of the activity will be sought on your behalf by College staff however you may be required to submit further evidence.
	
	Non-ACEM research:
	Upload a document noting the following:
	• research question; and
	• methodology; and
	• governing organisation.
	    or
	Upload a letter from hospital or organisation on letterhead certifying your research role or your role as project supervisor, duration and period of the research.
	    or
	Upload evidence from the event coordinator, or organisation of your participation as an adjudicator
	• verification of your role (e.g. invitation to adjudicate etc.), the date and duration; and
	event program (if applicable).

Peer Review of Educational Activities
 	
e.g. ACEM item writing, ACEM materials, Best of Web EM resources review, examination questions, journal articles, literature review, textbooks
	ACEM reviewing and editing:
	In the Activity comments field record:
	• name of activity; and
	• your role as editor, reviewer or editor (e.g. Best of Web EM reviewer etc.).
	In the first instance, evidence of the activity will be sought on your behalf by College Staff however you may be required to submit further evidence.
	
	Non-ACEM reviewing and editing:
	Upload all of the following:
	• list of the article(s) reviewed/refereed; and
	• link to online articles or copy of the articles;
	    or
	Upload a copy of literature review, clearly dated.
	    or
	Upload a letter from the author, editor or organiser on letterhead certifying your role, duration and dates of the activity.

Activity Type	Examples of evidence
Writing, editing and refereeing *e.g. Curriculum, eLearning activities, examination questions, guidelines, journal articles, teaching materials, textbook*	**ACEM writing and editing workshops:** ACEM activities will be recorded and evidence attached on your behalf. Please check your records **ACEM writing and editing off site:** In the Activity comments field record: • name of the ACEM materials • Relevant ACEM Committee or group the materials relate to. **Non-ACEM writing, editing and refereeing:** Upload both of the following: • copy of the curriculum, teaching materials or guidelines etc.; and • evidence of your involvement, the date(s), and duration (e.g. meeting minutes, correspondence between developers). or Upload a letter from the author or organisation on letterhead certifying your role in the development, review or refereeing of materials, date(s) and duration.

3.   PROCEDURAL SKILLS

Activity Type	Examples of evidence
Airway, Breathing, Circulation and Scope of Practice Skills (performed, taught or supervised in a clinical or simulated environment)	**ACEM activities:** For procedural skills that were *supervised* as part of the FACEM Training Program, in the Activity comments field record: • FACEM WBA (DOPS). *In the first instance, evidence of the activity will be sought on your behalf by College staff, however you may be required to submit further evidence.* **ACEM Approved activities:** ACEM approved activities will be recorded and evidence attached on your behalf. Please check your records. **Non-ACEM activities:** *Documentation must certify your completion of, and the mode (performed/taught/supervised) of each procedural skill:* Upload a letter from the DEM or equivalent authority on letterhead, listing the skills entered in your CPD record, the mode, and the date(s). or Upload a certificate of completion (for simulated skills). Include a copy of the course program showing the procedural skill completed. or Upload a statutory declaration, listing the skills entered in your CPD record, the mode, and the date(s).

4.   REVIEWING PERFORMANCE

Activity Type	Examples of evidence
Review of Standards Adherence - Accreditation visits for hospital/training sites *e.g. Accreditation visits to sites as observer or site inspector for ACEM or other institution, preparation for site accreditation.*	**ACEM site accreditation visit:** ACEM activities will be recorded and evidence attached on your behalf. Please check your records. **ACEM site accreditation preparation:** Upload a letter from the site inspection organiser or the hospital on letterhead certifying your role, the date(s) and duration. **Non-ACEM site accreditation visit/preparation:** Upload a letter from the site inspection organiser or the hospital on letterhead certifying your role, the date(s) and duration of the site accreditation visit.
Review of Standards Adherence/Measure *e.g. Review of standards adherence*	Upload a copy of the audit or A letter from the DEM or equivalent authority on letterhead certifying your role, duration and date(s).
Review of Non-clinical Guideline *e.g. Non-clinical guideline development and implementation*	Upload both of the following: • copy of the guidelines developed; and/or evidence of your involvement (e.g. meeting minutes, correspondence between developers, letter from lead developer or DEM on letterhead).
Review of Clinical Guidelines *e.g. Clinical guideline development and implementation*	Upload both of the following: • copy of the guidelines developed; and/or evidence of your involvement (e.g. meeting minutes, correspondence between developers, letter from lead developer or DEM on letterhead).
Review of Medical Records *e.g. Case-based discussions (CbD) as an assessee, joint review of cases, peer review of cases, presenting case for peer review.*	Upload an ACEM Peer Review record form(s). or Upload a de-identified record of peer review completion and outcome certifying your role, the date(s) and duration.
Supervision *e.g. Providing feedback to assessee as an assessor.*	**ACEM activities will be recorded on your behalf** (Please check your records) or Upload a de-identified record of peer review completion and outcome certifying your role, the date(s) and duration.
Peer Review of Performance *e.g. Direct observation as a reviewer or reviewee, WBA's and ITA's as an assessee, structured conversation, patient feedback, Regular Practice Reviews (RPR) as reviewee.*	Upload a short summary of the review, showing evidence of your involvement, the date(s) and duration. or Upload a de-identified record of peer review completion and outcome certifying your role, the date(s) and duration.

Activity Type	Examples of evidence
Peer Review of Performance *e.g. Balint group*	In the Activity *comments* field record: • name of discussion group; and • discussion date(s); and • location of group meeting(s) or Upload a logbook/record containing the above information
Annual Conversation *e.g. Structured Conversation*	Upload an ACEM Annual Conversation form or Upload a short summary of the Annual Conversation, showing evidence of your involvement, the date(s) and duration.
Performance Reviews e.g. Regular Practice Review RPR) as a reviewer.	Upload a short summary of the review, showing evidence of your involvement, the date(s) and duration.
Peer discussion of cases, critical incidents, safety and quality reviews. *e.g. Complaint review, team debrief session.*	Upload an ACEM Peer Review record form(s). or Upload a de-identified record of peer review completion and outcome certifying your role, the date(s) and duration.
Peer discussion of cases, critical incidents, safety and quality reviews. *e.g. AMC accreditation/assessment.*	**AMC accreditation visit:** ACEM activities will be recorded, and evidence provided on your behalf. Please check your records. Non ACEM: Upload a letter from the DEM or equivalent authority on letterhead certifying your role, duration and date(s).
Peer discussion of cases, critical incidents, safety and quality reviews. *e.g. College committee meeting, professional organisation committee meeting, senior ED staff meetings.*	**ACEM meetings:** ACEM activities will be recorded, and evidence provided on your behalf. Please check your records. **Non-ACEM meetings:** Upload minutes of meeting including your name as participant, date and duration of activity. or Upload a certificate of attendance. or Upload a letter from the meeting organiser on letterhead certifying your participation, the date(s) and duration of the meeting/activity.
Peer Review of journal articles *e.g. As an author of a journal article.*	Upload all of the following: • list of the article(s) reviewed/refereed; and • link to online articles or copy of the articles; or Upload a copy of literature review, clearly dated. or Upload a letter from the author, editor or organiser on letterhead certifying your role, duration and dates of the activity.

Activity Type	Examples of evidence

Peer Review of Educational Activities	**ACEM research:**
	In the Activity comments field record:
	• name of the research project; and
	• summary of your role in the review/adjudication
	In the first instance, evidence of the activity will be sought on your behalf by College staff however you may be required to submit further evidence.
	
	Non-ACEM research:
	Upload a document noting the following:
	• research question; and
	• methodology; and
	• governing organisation.
	    or
	Upload a letter from hospital or organisation on letterhead certifying your research role or your role as project supervisor, duration and period of the research.
	    or
	Upload evidence from the event coordinator, or organisation of your participation as an adjudicator
	• verification of your role (e.g. invitation to adjudicate etc.), the date and duration; and
	• event program (if applicable).
	Curriculum:
	Upload both of the following:
	• copy of the curriculum developed; and/or
	evidence of your involvement (e.g. meeting minutes, correspondence between developers, letter from lead developer or appropriate authority on letterhead).

Reflection on Professional outcomes. *e.g. CPD plan preparations, CPD plan review and reflection, professional development goal setting, strategic planning.*	Complete Professional Development Plan via 'Professional Development Plan' section in your **My ACEM portal**. or Upload a copy of the work-place professional development plan, clearly dated.

Survey Completion - participant	• Upload a copy or a web link of the completed survey.
	    or
	• A summary of the survey, showing evidence of your involvement, the date(s) and duration.
	    or
	In the Activity *comments* field record:
	• name of the survey
	• a web link to the survey
	• name of organisation
	description.

Reflection on Professional outcomes	**Mentor/Mentee meetings** • Upload a logbook/record outlining date(s) and duration of meetings with mentor/mentee(s).

Activity Type	Examples of evidence
Audit of Medico-legal reports *e.g. Doctor's medico-legal reports - AMP*	Upload a short summary of the review, showing evidence of your involvement, the date(s) and duration.
Multi-source feedback; performance appraisals	Upload a de-identified record of peer review completion and outcome certifying your role, the date(s) and duration.

Meetings
 	
e.g. Hospital or professional organisation committee, M&M, critical incident monitoring, trauma, strategic planning and review etc.
	ACEM meetings:
	ACEM activities will be recorded, and evidence attached, on your behalf. Please check your records.
	
	Non-ACEM meetings:
	Upload minutes of meeting including your name as participant, date and duration of activity.
	    or
	Upload a certificate of attendance.
	    or
	Upload a letter from the meeting organiser on letterhead certifying your participation, the date(s) and duration of the meeting/activity.

Peer review *e.g. 360 degree appraisals and feedback, direct observation, multi-source feedback, WBA (assessee)*	Upload an ACEM Peer Review record form(s). or Upload a de-identified record of peer review completion and outcome certifying your role, the date(s) and duration.
Peer review of cases *e.g. case-based discussions, discussion groups, joint review of cases, review of charts, team debrief etc.*	Upload an ACEM Peer Review record form(s). or Upload a de-identified record of peer review completion and outcome(s) certifying your role, the date(s) and duration.
Professional Practice Review *e.g. patient feedback and quality improvement, providing feedback to assessee, review doctors' medico-legal reports, scope of clinical practice review etc.*	Upload a short summary of the review, showing evidence of your involvement, the date(s) and duration.
Regular Practice Review *e.g. regular practice reviews as reviewee or reviewer*	Upload a short summary of the review, showing evidence of your involvement, the date(s) and duration.

5.   MEASURING OUTCOMES

Activity Type	Examples of evidence

Audit (AMP)
 	
e.g. Clinical quality, documentation & communication, educational activities, patient flow, workforce, etc.
	Upload a completed ACEM Audit of Medical Practice record form.
	      or
	Upload a similar record of audit completion and audit outcome(s) certifying your role, the date(s) and duration of the Audit of Medical Practice.
	      or
	Upload a letter from the audit lead, DEM etc. on letterhead certifying your role, the date(s) and duration of the Audit of Medical Practice.

Clinical Audit – Clinical results review e.g. Clinical quality, clinical trial, pathology/radiology/ultrasound/ x-ray.	Upload a logbook/record outlining date(s) and duration. or Upload a letter from the DEM or equivalent authority on letterhead certifying your role, the date(s) and duration of the Clinical Results Review
Review of Data *e.g. Individual/team and comparative data, benchmark performance against data sets*	Upload a deidentified copy of the data review including details of involvement or Copy of letter from DEM/ DEMT/ main investigator certifying and detailing involvement
Research	**Publishing data:** **ACEM research:** In the Activity comments field record: - name of the research project; and - summary of your role in the review/adjudication *In the first instance, evidence of the activity will be sought on your behalf by College staff however you may be required to submit further evidence.* **Non-ACEM research:** Upload a document noting the following: - research question; and - methodology; and - governing organisation. or Upload a letter from hospital or organisation on letterhead certifying your research role or your role as project supervisor, duration and period of the research. or Upload evidence from the event coordinator, or organisation of your participation as an adjudicator - verification of your role (e.g. invitation to adjudicate etc.), the date and duration; and event program (if applicable).

Activity Type	Examples of evidence
Peer discussions *e.g. Cases, critical incidents, safety and quality reviews, root cause analysis.*	Upload an ACEM Peer Review record form(s). or Upload a de-identified record of peer review completion and outcome certifying your role, the date(s) and duration.
Review of Clinical Guidelines *e.g. Clinical guideline development and implementation*	Upload both of the following: copy of the guidelines developed; and/or evidence of your involvement (e.g. meeting minutes, correspondence between developers, letter from lead developer or DEM on letterhead).
Review of medical records *e.g. Documentation and communication*	Upload a short summary of the review, showing evidence of your involvement, the date(s) and duration.
Peer Review of performance *e.g. Quality Improvements*	Upload an ACEM Peer Review record form(s). or Upload a de-identified record of peer review completion and outcome certifying your role, the date(s) and duration.
Mortality and morbidity review *e.g. Mortality and morbidity meetings as an attendee, inter-departmental case review and interpretation of findings.*	Upload minutes of meeting including your name as participant, date and duration of activity. or Upload a certificate of attendance. or Upload a letter from the meeting organiser on letterhead certifying your participation, the date(s) and duration of the meeting/activity.

6.   CPD EXEMPTIONS

Provision of evidence is a requirement for the approval of all exemptions, at the time of application.

In addition, provision of evidence is a requirement for the ongoing annual approval of Procedural Skills.

You **are not** required to upload this evidence as part of an audit, as the College has records of this evidence.

Activity Type	Examples of evidence
Annual exemption Temporary (6 month) exemption	Upload a medical certificate confirming period of absence. or Upload a letter on letterhead from treating clinician confirming the estimated due date(s) of confinement. or Upload confirmation of approved leave applications from employer including period of absence (e.g. Long service leave, parental leave, unpaid leave, study leave).

Activity Type	Examples of evidence

Procedural Skills exemption	Upload a contract of offer for non-clinical role from employer (for appointments within the current CPD year).
	    or
	Upload a confirmation of appointment letter from employer on letterhead stating non-clinical role (for appointments within the current CPD year).
	    or
	Upload a letter from employer on letterhead stating non-clinical role including start/finish date(s).

7.   DOCUMENT REVIEW

Timeframe for review: every two (2) years, or earlier if required.

7.1   Responsibilities

Document authorisation: CPD Committee
Document implementation: CPD Committee
Document maintenance: CPD Manager / General Manager, Governance and Standards

7.2   Revision History

Version	Date(s)of Version	Pages revised / Brief Explanation of Revision
v1	Aug-2018	Approved by CPD Committee
v2	Apr-2019	Amendments relating to guidance for 2020
v3	Oct-2020	Amendments relating to guidance for the 2021 CPD Year
v4	Dec-2021	Change of title of Document from CPD Year to CPD Cycle Amendments relating to guidance for the 2021-23 CPD Cycle
v4.1	June-2022	Revised to reflect change in terminology from 'Cultural Competence' to Cultural Safety'