

January 2017

## Guidance for practitioner registrants: CPD, re-registration and revalidation

### Preamble

In this guidance we shall be referring to:

**CPD** Continuing Professional Development is a mandatory requirement of registration through which UKPHR places an ongoing responsibility on registrants to keep their public health knowledge and practice up to date, thereby maintaining their competence and improving the quality of public health practice.

**Annual renewal** Every year every registrant is required to renew her or his registration by making payment of an annual registration fee and making a declaration in relation to their practice, conduct and health. The latter declaration is part of UKPHR's assurance process in monitoring fitness to practise and promoting improvement in the quality of public health practice.

**Re-registration** In addition to annual renewal of their registration, all registrants are required, once every 5 years, to undergo re-registration. UKPHR operates re-registration for all specialist and practitioner registrants. Requirements are:

- Up to date annual renewal fee
- Annual declaration
- Production of evidence that the appropriate CPD requirement has been met for the preceding 5 years;
- Production of an annual appraisal (UKPHR does not specify professional or workplace appraisal) that has taken place within 12 months of re-registration;
- Production of a Personal Development Plan (PDP) dated within 12 months of re-registration;
- In the case of the appraisal and the PDP both documents should be signed off by a public health specialist who is registered by the General Dental Council, the General Medical Council (GMC) or UKPHR.

The purpose of re-registration is to conduct a more rigorous check than at each annual renewal so as to monitor fitness to practise and promote improvement in the quality of public health practice.

## Revalidation

As conducted under its statutory duties, the GMC operates revalidation of all its registrants. GMC describes revalidation as the process by which all licensed doctors are required to demonstrate on a regular basis that they are up to date and fit to practise in their chosen field and able to provide a good level of care. As long ago as 2010, UKPHR decided in principle that once GMC introduced revalidation for its registrants, UKPHR ought to introduce revalidation for its registrants. The key difference for UKPHR is that there is no statutory underpinning for its revalidation scheme. UKPHR intends to introduce revalidation in place of its existing re-registration process over the next three years.

## Background

**Practitioner registration** is a more recent operation for UKPHR than specialist registration. The first practitioner registrations took place in 2011.

**A CPD requirement** specifically designed for practitioner registrants was introduced in July 2014. UKPHR's CPD requirement is for practitioner registrants to complete a minimum of 75 hours learning activity over a period of five years. This requirement equates to 15 hours of activity annually but is expressed as a five-yearly minimum requirement in order to match the 5-year re-registration cycle and to provide registrants with flexibility in achieving compliance. At least one-third (25 hours) of the minimum 75 hours of CPD activity must be undertaken in the four core areas of practice (as set out in UKPHR's standards for practitioner registration).

The Registrar's first audit of compliance showed that in general practitioners take seriously their responsibility to maintain and improve their professional competence through CPD. However, the flexibility created by not specifying an annual minimum number of hours led to wide variation in performance. As a result, the Registrar emphasised that, whilst flexibility will be maintained, practitioners should aim to complete a minimum of 15 hours CPD each year. In this way, practitioners can keep on track year by year to meet the 5-year requirement of 75 hours CPD minimum and avoid the two extremes of completing a substantial proportion of the 75 hours at the start or end of the 5-year period.

Compliance is the personal responsibility of every practitioner registrant. It requires the keeping of a log of CPD activity and writing brief reflective notes to accompany each individual CPD learning activity undertaken. UKPHR is assured of compliance in two ways:

1. At every annual renewal of registration every practitioner registrant must make a self-declaration that the CPD requirement is being met; and
2. At 5-year re-registration every practitioner registrant must produce evidence of compliance with the CPD requirement, usually the evidence produced will be the registrant's CPD log.

The first **re-registrations of practitioners** commenced in 2016.

In some early cases of practitioner re-registration, registrants have informed UKPHR of their difficulty in complying with UKPHR's requirement for their appraisal and PDP to be signed off by a public health specialist registered by the General Dental Council, GMC or UKPHR.

For those few practitioner registrants experiencing difficulty, reasons have included: there was no such specialist registrant in the workplace where they worked or there were special circumstances making it inappropriate for a specialist registrant to be asked to sign off a registrant's appraisal and PDP.

In these few instances to date, the Registrar has considered requests for approval of a different arrangement for sign-off and these requests have been considered on a case-by-case basis.

To date, the small number of difficulties that have arisen have been experienced by practitioner registrants. No such problems have been reported to UKPHR by specialist registrants but should such problems arise in future the Registrar would equally consider the circumstances of the individual specialist registrant concerned and consider whether to accept an alternative arrangement.

## Guidance

This guidance sets out UKPHR's CPD and 5-yearly re-registration requirements (the latter soon to be succeeded by revalidation). It describes the Registrar's ability to be flexible in the event that individual registrants might experience difficulty in complying with UKPHR's re-registration requirements.

It is necessary on applying for re-registration for all registrants to produce evidence of an appraisal and a PDP, both dated within 12 months of the due date for the individual registrant's re-registration.

UKPHR expects that both the appraisal and the PDP will have been signed off by a public health specialist who is registered by the General Dental Council, GMC or UKPHR. The reasons for this include: to enable UKPHR to have assurance that the person signing off the appraisal and PDP (a) has knowledge of the registrant and (b) has public health knowledge and skills sufficient to recognise good public health practice.

A registrant who applies for re-registration and who:

- > Is able to comply with requirements for fee payment, annual declaration and CPD: **AND**
- > Is able to produce an appraisal and a PDP both dated within 12 months of re-registration; **BUT**
- > Is unable to obtain sign-off on one or both documents by a requisite registered public health specialist

should alert UKPHR as soon as possible to the difficulty.

A registrant who is unable to obtain sign-off of an appraisal and/or a PDP by a requisite registered public health specialist will be expected to make a request in writing to UKPHR for the Registrar to consider making an alternative arrangement.

The registrant must state why it is not possible, not practical or otherwise inappropriate for the registrant to comply with UKPHR's requirement as to sign-off.

In any such case the registrant may ask UKPHR to accept alternative sign-off arrangements in support of re-registration and any such request will be considered by the Registrar on its individual merits.

In any case where the Registrar considers whether to accept alternative sign-off arrangements, the Registrar may, in order to protect the integrity of the register, impose such conditions as the Registrar thinks fit or refuse the request.

A registrant who is dissatisfied with a decision of the Registrar may make an appeal to UKPHR's Appeals Panel.

*The Registrar is appointed by the Board and is the Officer accountable to the Board for the integrity of the register and for the quality assurance of the processes for the assessment, registration, fitness to practise, revalidation and restoration of individuals.*

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