



UKPHR

Public Health Register

Protecting the public – improving practice

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UKPHR guidance on CPD scheme for practitioners

PURPOSE OF THIS GUIDANCE

UKPHR has a mandatory CPD requirement to which all practitioner registrants must adhere.

As UKPHR's CPD policy statement sets out, registrants are expected to keep their learning and development up to date. You are expected to exercise your professional judgement and responsibility in deciding how best to do this.

The CPD requirement supports practitioner registrants by setting a framework within which you may decide how to keep your learning and development up to date. It sets the framework by reference to four key principles. Registrants are required to familiarise themselves with these key principles:

- (1) Meet the minimum requirement of 15 hours of relevant CPD per year, together with reflective comment for each CPD activity, and a minimum of 75 hours over a 5-year cycle, to include CPD relevant to the UKPHR four areas of practice.
- (2) Link at least one-third of the minimum required CPD to UKPHR's four areas of practice and link at least half of the minimum required CPD to a Personal Development Plan (PDP).
- (3) Keep records of your CPD, including reflective comments, as you may be required to produce them in order to comply with UKPHR's audit processes.
- (4) Read and sign the annual registration declaration statement to state, amongst other matters, that you are aware of the CPD requirement and are participating accordingly, understanding that serious or persistent failure to meet the requirements of the CPD policy will put your registration at risk.

UKPHR requires you to make an annual declaration to confirm that you are keeping your learning and development up to date and hence remain fit to practise. The statement you must declare makes explicit reference to the CPD requirement and seeks confirmation that learning activity is being undertaken and a record of it is being kept.

The Registrar will audit those records so that UKPHR can be satisfied of your compliance.

THE CPD REQUIREMENT

UKPHR stresses that it is the individual registrant's responsibility to keep learning and development up to date and to identify individual learning needs and decide upon the manner of meeting those needs.

The Registrar does not mandate a set way of identifying learning and development needs nor how best to meet those needs. You will have individual needs and how to meet them depends on what they are and how you are placed to be able to meet them.

The Registrar is however clear that the professional obligation to undertake learning and development applies continuously. This is apparent in the name "*Continuing Professional Development*".

The Registrar recognises that guidance can usefully be given to assist practitioner registrants to plan their learning and development activity. In addition, some minimum requirement has to be stated so that those who wilfully fail to discharge their professional responsibility can be held to account.

It is in this context that the CPD policy sets out a minimum requirement for completing 15 hours learning activity a year, and a minimum of 75 hours over a period of five years. It applies equally whether you are employed full-time or part-time, self-employed or out of work including retired. It is being on the register that attracts the obligation, not work status.

The requirement to complete at least 15 hours of activity annually makes for a minimum required CPD activity of 75 hours over a five-year cycle. The minimum requirement was set for the following reasons:

1. The five-year cycle will match the registration cycle, which requires re-registration every five years. At re-registration every registrant must produce evidence of compliance with the CPD requirement as well as up to date appraisal. In due course, it is anticipated that re-registration will be superseded by revalidation and CPD will be an important element of revalidation also.
2. An annual target to complete a minimum of 15 hours learning activity helps you to keep on track to meet the five-yearly CPD requirement.

The 15 hours and 75 hours' totals are minima and both must be met or surpassed.

The quantum was set by reference to research carried out for UKPHR prior to designing the CPD policy. This research included a survey of practitioners and a review of CPD requirements in comparative professional settings. It also takes into account the professional view of the Faculty of Public Health.

CORE AREAS OF PRACTICE

In selecting CPD activity, you are guided by the CPD requirement to have regard to the need to undertake learning by reference to UKPHR's four core areas of practice and your Personal Development Plan (PDP).

You should be familiar with the four core areas of practice from when you prepared a portfolio for assessment. You should have an annual PDP when you are in work.

The practitioner registration scheme was designed by UKPHR with input from the public health community. It took as its starting point what was then the Public Health Skills and Careers Framework (it is today called the Public Health Skills and Knowledge Framework).

The designers also took account of the National Occupational Standards for health and the NHS Key Skills Framework.

As a result of this work, the standards set for the practitioner registration scheme enable UKPHR, through registering practitioners, to assure their professional competence to work autonomously (in other words, without the need for direct supervision).

This explains why UKPHR's CPD policy refers to the four core areas of practice.

Setting a requirement that, over a five-year cycle, a minimum of one-third (25 hours) of the minimum 75 hours of CPD activity must be undertaken in respect of these four core areas is a means of ensuring that that your professional competence, established at the time of first registration, has been maintained. The quantum of one-third is based on the research which underpins UKPHR's CPD policy.

Setting a requirement that, over a five-year cycle, a minimum of half (37.5 hours) of the minimum of 75 hours of CPD activity must be undertaken by reference to your PDP is a means of ensuring that the quality of your public health practice is maintained and enhanced in a work setting. The quantum of half is based on the view of the Faculty of Public Health.

These two requirements are not mutually exclusive. It is possible, indeed likely, that some CPD learning that is relevant to the core areas and your PDP. Matching your CPD learning to both at the same time means that the CPD activity can count towards both requirements.

SELECTION OF CPD ACTIVITY

UKPHR is not a provider of CPD learning and has no plans to become a provider. UKPHR has no plans to produce a list of approved providers, nor a list of approved CPD activities. The reasons for this have already been explained: the individual needs of registrants, exercise of professional judgement and responsibility and the diversity of learning needs and how to meet them.

However, UKPHR has an interest in at least two aspects of CPD provision, namely:

- (1) The quality of CPD learning undertaken by its registrants; and
- (2) The availability of sufficient, appropriate CPD learning activities for all registrants.

The Registrar will monitor the quality of CPD undertaken by registrants through auditing. If the Registrar has concern that audit evidence suggests that a learning activity was poor quality, further information will be requested. It may result in the Registrar giving guidance to the individual registrant for the future, challenging the provider and/or issuing supplemental guidance for all registrants.

UKPHR is not going to bestow its approval on specific activities or particular providers.

The Registrar would, however, expect you to ask yourself:

- Are the aims and objectives of the activity clear?
- Will attendance be verified?
- Will there be a CPD certificate at the end?
- Are there opportunities to ask questions?
- Is it possible to give and receive feedback?
- Are the activities subject to quality assurance?

This is not an exhaustive list of the matters you will weigh up in deciding what CPD learning activity to undertake but the answers to these questions should help with assessing quality.

Similarly, the following is not an exhaustive list of types of CPD activity but describes a range of activities which may feature in your CPD log.

The types of CPD activity that UKPHR might expect registrants to undertake include:

1. *Learning as part of your job*
2. *Group work, seminars and journal clubs*
3. *Conferences, workshops and educational meetings*
4. *Formal courses*
5. *Private study and reading*
6. *Public health audit, appraisal and reflective practice*
7. *Training, teaching, examining and preparation time*
8. *Research*
9. *Organisational development activities*
10. *Inspection and review activities*

The Registrar will communicate with known CPD providers and monitor their and other providers' learning activities with a view to being satisfied that there is sufficient availability and diversity of CPD learning activities to enable registrants to meet the CPD requirement.

UKPHR will also take every opportunity to communicate the CPD requirement to registrants' employers and urge them to support their employees in meeting their CPD requirement.

CPD AND APPRAISAL AND PERSONAL DEVELOPMENT PLANNING

We require your CPD learning to be linked to your PDP. We also recommend that your CPD activities should be linked to your work appraisals.

A practical reason for this is that UKPHR's re-registration process also links to PDP and appraisal.

It is for you to decide how best to link CPD activity with work-focussed objective-setting.

The Registrar stresses that there is no suggestion at all that UKPHR is asking or expecting you to share their personal information regarding your CPD records with an employer, commissioner of your services or other funders or managers.

You are entitled to keep such personal information which you share with the Registrar private and confidential, as between you and your employer or other work contacts.

However, making links may reduce record-keeping burdens and streamline work-related learning and development.

Some registrants do not have an employer to help link CPD with PDP and appraisal (you may be self-employed, temporarily unemployed, on a career break, including maternity, paternity and adoption leave or retired from full-time work). Alternatively, your employer may be a very small organisation with no infrastructure for linking CPD with PDP and appraisal.

In these cases, UKPHR encourages innovative ways of matching CPD to work-focussed objective-setting and certainly peer support is one such method.

COMPLIANCE WITH THE CPD POLICY AND REFLECTIVE NOTES

As a professional, you are expected to be responsible and manage your learning and development so as to comply with the CPD requirement.

We require you to keep a log of CPD learning activity undertaken together with evidence of the activities and your reflective comments on the learning and development achieved.

These requirements apply in respect of all the minimum 75 hours of CPD learning over the five-year cycle. Exceptionally, you may self-certify CPD learning in cases where there is no separate evidence that can be produced for a limited amount of the total CPD requirement.

UKPHR's CPD policy explains that self-certification in place of separate evidence in excess of 15 hours of CPD learning will attract the Registrar's scrutiny.

For CPD learning beyond the minimum 75 hours required, these requirements represent good practice and so you are recommended to continue to keep a log, together with evidence and reflective comments.

The concept of reflective practice centers on the idea of lifelong learning in which you analyse experiences in order to learn from them. It is therefore important that you take time systematically to reflect on the learning gained through your CPD activities as this is more likely to embed the learning within your subsequent practice. Because of this, the production of reflective notes about your learning is fundamentally the most discriminating form of evidence of effective CPD.

UKPHR wishes to remain non-prescriptive regarding the format in which reflection can take place, indeed recognising that numerous models of reflection exist, therefore individual preferences will determine your chosen methods. We do, however, require you to write a reflective note of approximately 150 words for each CPD activity you undertake.

To support you and give you guidance on making reflective notes, some key questions you may want to consider when making reflective comments are:

- 1. Why did I choose this activity for my CPD?*
- 2. What did I learn from this activity, experience or event?*
- 3. How am I going to apply this learning in my future practice?*
- 4. What am I going to do in future to further develop this learning and/or meet any gaps in my knowledge, skills or understanding?*

SPECIAL CIRCUMSTANCES

In some circumstances, you may find participation in CPD activity difficult or impossible for a period of time. You should contact the Registrar as soon as you are aware of any such circumstances.

Situations where such circumstances may be foreseeable include: working less than full-time, sick-leave, maternity/paternity leave, adoption leave or other career breaks.

Practitioners working less than full-time have the same CPD requirement as practitioners working full-time, on the grounds that everyone needs to be 100% competent.

Any deficit in CPD should be made up over the remainder of the five-year cycle if possible. This may be achieved prospectively (where appropriate), retrospectively (for example, after a return to work) or a combination.

Where a work absence is for more than a year, advice from the Registrar should be sought.

In all such circumstances the Registrar will be as flexible as possible in helping you to:

- Remain compliant with the CPD requirement;
- Restore your compliance; or
- Exceptionally, complete a reduced CPD requirement.

If you find yourself in any such situation, you should self-certify as much CPD learning as appears justifiable in terms of the learning achieved. Any shortfall to be made up should be discussed with the Registrar.

You may be eligible for exemption from some or all of the CPD requirement if you participate in another organisation's CPD scheme which has been recognised as acceptable to UKPHR: documentary evidence must be provided.

AUDITING

UKPHR is committed to right-touch regulation. Right-touch regulation describes the approach UKPHR adopts in all the work it does.

It is the approach that the Professional Standards Authority (PSA) encourages health professional regulators to work towards, and UKPHR's register is accredited by PSA.

According to the PSA:

Right-touch regulation means always asking what risk we are trying to regulate, being proportionate and targeted in regulating that risk or finding ways other than regulation to promote good practice and high quality healthcare. It is the minimum regulatory force required to achieve the desired result.

UKPHR's CPD policy requires you to collect, retain and produce evidence, if and when requested, with this approach in mind.

The Registrar will audit practitioner registrants' records. You should expect a request to produce records for examination and in this event you must produce your CPD log within 4 weeks from the date of the request.

The requirement for you to keep CPD records has been in place since the inception of UKPHR's CPD policy (July 2014). Therefore, there is no expectation that you will produce CPD records from earlier than July 2014.

The Registrar shall be guided in carrying out audit activity by intelligence gathered through registrants' annual declarations, registrants' and others' comments received by UKPHR and through surveillance.

The Registrar will have regard to any patterns of slips below acceptable standards of public health practice and the effect of carrying out some element of random checking.

Audit activity will, therefore be continuous but the amount of audit activity in any given year will be determined by the application of these factors.

If you avail yourself of the Faculty's online CPD system, including its auditing, we would not wish to burden you with two audits within a single year. Therefore, if you receive an audit request from UKPHR within 12 months of having completed satisfactorily a CPD audit completed by the Faculty, tell us and we will waive our audit. This approach will also apply if you record your CPD learning with another professional body which operates an equivalent system.

UKPHR ACTION IN THE EVENT OF POTENTIAL AND ACTUAL NON-COMPLIANCE

The phrase “serious and persistent failure” is in widespread use by regulators. A regulator will intervene where there is evidence of potential non-compliance that is more than minor.

Factors taken into account in determining whether the non-compliance is more than minor include the serious nature of the conduct highlighted and whether the same or similar non-compliance has happened before.

The intervention encompasses investigation, obtaining evidence and considering that evidence. It includes obtaining registrants’ comments and considering those comments.

The matter may be resolved at this stage by taking no further action, taking corrective action short of a referral to a Fitness to Practise Panel (for example, a direction to put right the non-compliance) or, in appropriate cases, referral to a Fitness to Practise Panel.

The actions of the Registrar and the Fitness to Practise Panel are governed by UKPHR’s rules, including the Fitness to Practice Rules.

The rules provide appeal procedures and remedies:

Fitness to Practise Rules:

<http://www.ukphr.org/registration/fitness-to-practise-rules-2/>

ADDITIONAL INFORMATION

In keeping with UKPHR’s commitment to continuous improvement, the Registrar will have in place a process for regularly reviewing the CPD policy for its effectiveness and to ensure that it remains relevant to the best of public health practice and thereby ensuring public protection.

Many registrants are also registered with other health and social care regulators, including dentists, doctors, environmental health practitioners, nurses and pharmacists. These dual registrants may be burdened by two CPD schemes (not to mention two registration fees).

UKPHR is conscious of the desirability of reducing duplication and overlap – not just for the benefit of registrants in keeping regulatory burdens manageable but also for maintaining effective public protection by avoiding uncertainty, misunderstanding and the potential to “fall between the gaps” amidst two differing regulatory bodies.

UKPHR has previously negotiated Memoranda of Understanding (MoU) with the General Dental Council and the General Medical Council. UKPHR will also discuss with other regulators whether similar MoUs can be agreed with them.