

Continuing Professional Development (CPD) Process Decisions

Executive Summary and Recommendations

Introduction

During the course of the CPD process analysis work a number of discussion points have arisen which require decisions to be made by the Education and Training Committee.

Summary

There has been a considerable amount of work undertaken since March 2007.

- A detailed project plan with timescales and deliverables designed.
- A further workshop was held with Digital Steps to complete the requirements gathering and costings for the LISA development.
- Assessors requested to submit sample CPD profiles.
- A CPD assessment day has been arranged for the 27 June 2007 where initial training will be delivered and assessing of sample CPD profiles will occur. The day will enable HPC to perform a CPD financial and resource impact analysis.

Decisions

Several detailed operational questions were raised in the paper considered by the Education and Training committee at its meeting in March 2007. These questions have now been considered by the Executive, who have also sought legal advice. Information arising from these questions is presented below for the Committee's consideration and approval.

- 1) If a registrant is denied the right to defer their CPD assessment, should they have the ability to appeal the decision?

The Executive recommends that a registrant should not have a right of appeal against the decision not to defer their audit. This is because the decision to allow a deferral is an internal, operational decision made by HPC based on the circumstances that are presented by the registrant, and not a decision made on the basis of provisions in the Health Professions Order.

However, if a registrant's application to defer their CPD audit was not accepted, and their registration was then not renewed (either because their profile did not meet the standards, or because they had not participated in the audit process) then the decision not to renew registration would be subject to HPC's normal appeals process: first to the Council, and then if necessary to the Courts.

- 2) If a registrant lapses after having been selected for CPD but then applies to return to the register within two years, should they be requested to demonstrate their CPD?

The Executive recommends that a registrant in this position should be asked to demonstrate evidence of their CPD as part of their application for readmission to the Register. Legal advice confirms that we should first ask the registrant for a profile to demonstrate that they were undertaking CPD during the two years proceeding the date their registration was lapsed. If this is not possible, then we may ask the applicant to provide a profile with evidence of any relevant CPD activity that they are currently undertaking. Each application can be considered on its own merits.

- 3) If a registrant lapses after having been selected for CPD but then applies to return to the Register after two years, should the returners to practice policy take precedence over CPD?

The Executive's recommendation is that a registrant, who has lapsed from the Register and has been out of practice for more than two years, should be asked for evidence of their CPD (as above) and also be required to meet the Council's standards for returning to practice. This would ensure consistency between applications for readmission, and ensure that applicants were not able to avoid the Council's requirements for returners.

- 4) At any point during the CPD process if a registrant were to have an allegation made against them should all CPD processing cease until the allegation had been resolved?

The Executive's recommendation is that the HPC's duty to protect the public from registrants whose fitness to practise may be impaired takes priority over the Council's CPD audit process. Therefore, if an allegation is received, the processing of any CPD profile received should cease, and the registrant should be held on the Register (as is currently the case) until the allegation has been dealt with appropriately.

- 5) If a registrant were to fail CPD but had not yet been removed from the Register and were to have an allegation made against them in the interim, all CPD processing would cease, and the F2P case would be heard. Would another decision then need to be made regarding CPD?

The Executive's recommendation is that the Council has been clear from the outset that its CPD process is separate from the fitness to practise process, and that participation in the CPD audit (although linked to fitness to practise) is not revalidation, or a 'guarantee' of ongoing fitness to practise. Therefore, if a decision has previously been made that a registrant's profile did not

demonstrate that their CPD met the Council's standards, even after any fitness to practise case has been disposed of, the original decision regarding CPD and renewal would still stand, and registration would be lapsed.

- 6) What would happen in the case where a registrant had failed CPD, but had not been removed from the Register, an F2P case then found that they must remain on the Register with conditions of practice? This would effectively mean that the CPD decision had been annulled.

The Executive's recommendation is similar to that of the last question: that regardless of the outcome of an FTP case, the decision made regarding the CPD profile still stands. Therefore if a panel directed that a registrant was fit to remain on the Register, with conditions of practice, that registrant would still be lapsed from the Register after the hearing.

- 7) If a registrant were to be selected for CPD, then had an allegation made against them that did not result in them being removed from the register, they would not be requested to complete their existing CPD assessment, should they be marked to be automatically selected during the next audit period?

The Executive's recommendation, based on legal advice received, is that if a registrant in this position sent in a profile, then it would be processed in the normal way. However, if a profile was not received, they would not be lapsed from the Register, but would instead be selected automatically in their profession's next CPD audit.

Background papers

1. Continuing professional development and your registration
2. Your guide to our standards for continuing professional development
3. Continuing Professional Development – Consultation paper
4. Continuing Professional Development – Key decisions

Appendices

Appendix 1 – CPD notification process
Appendix 2 – CPD audit and assessment process
Appendix 3 – Possible CPD LISA statuses

Date of paper

30th May 2007

Appendix 1 – CPD Notification process

Date	Ver.	Dept/Cmte	Doc Type	Title	Status	Int. Aud.
2007-03-15	a	POL	PPR	CPD Notification process	Draft DD: None	Internal RD: None

Day 0
New professional cycle



-3 months
Send renewal form & notification

-1 month
Send final renewal form & reminder

+7 days
Send 1st reminder
“You have 28 days to comply”

+35 days
Send 2nd reminder.
“You have 14 days before you are lapsed”

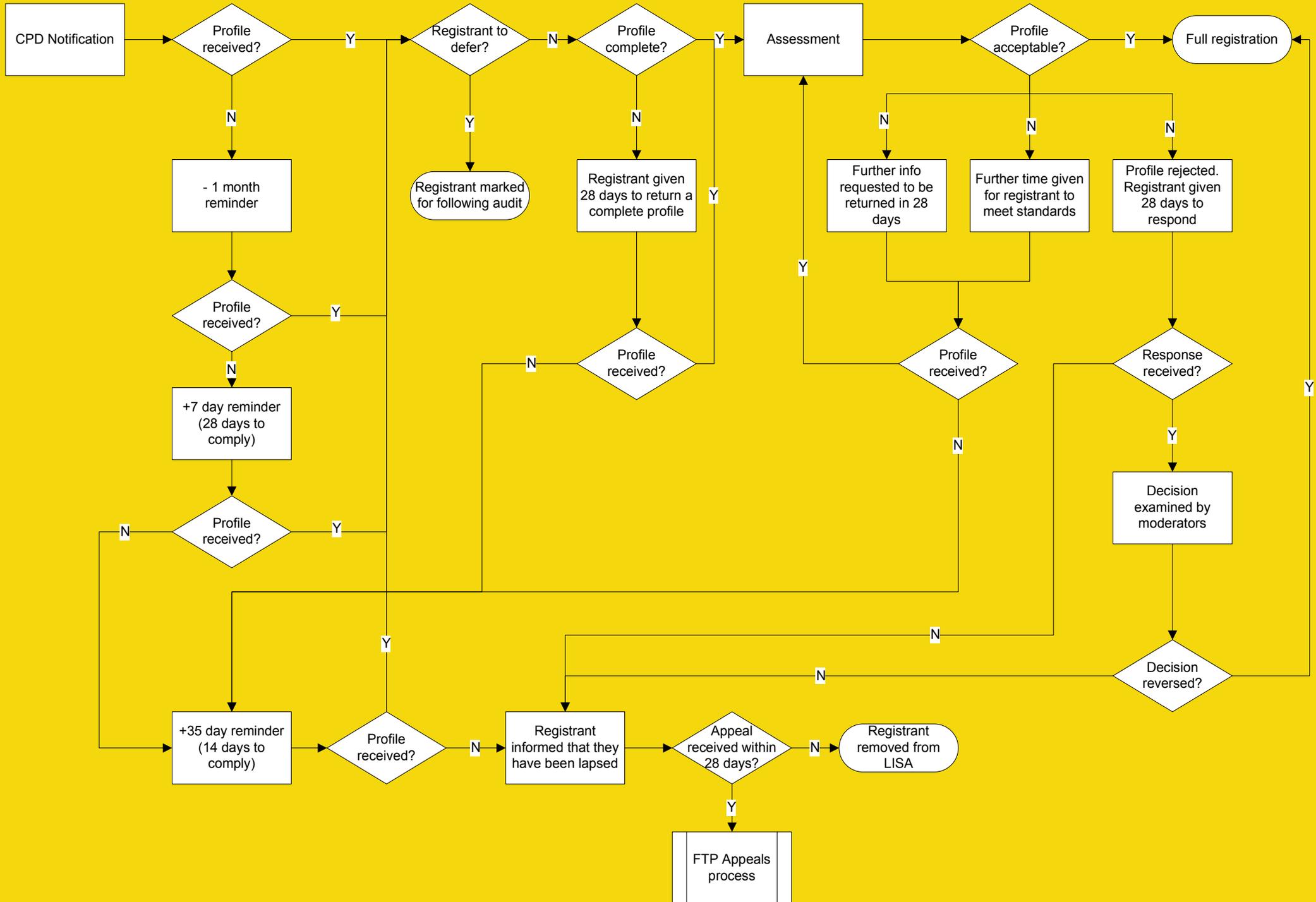
+49 days
Send lapsing letter.
“You have been lapsed you have 28 days to appeal”

+77 days
Registrant removed from LISA

Appendix 2 – CPD Audit and Assessment Process

v1.1

CPD Processing - High Level



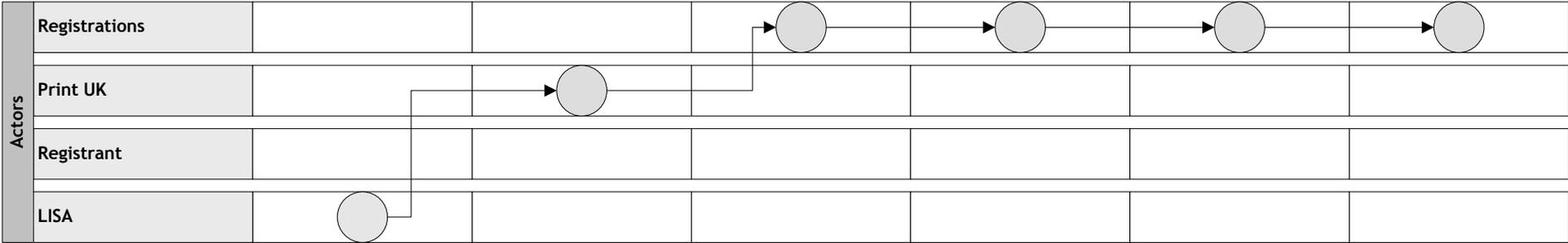
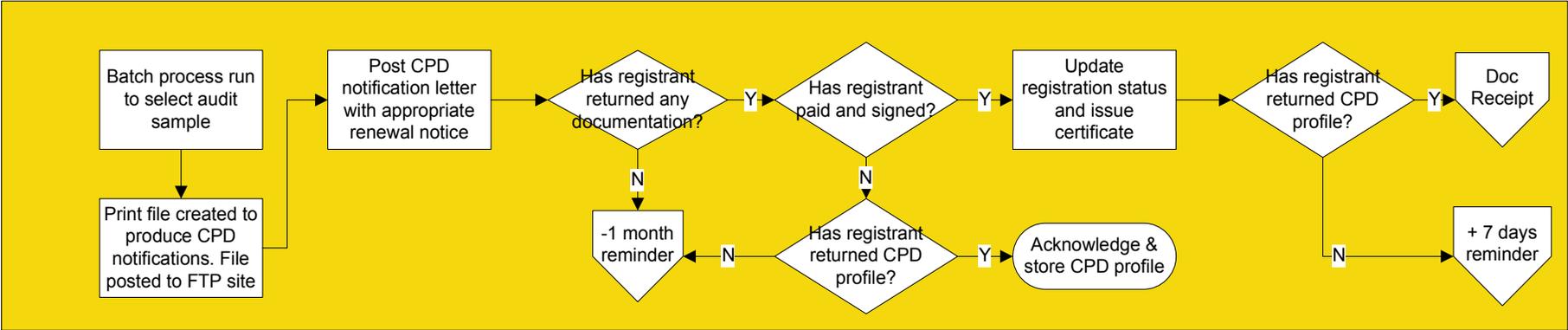
CPD Processing

Level 1

Process runs at any time between -3 months and -1 month

CPD
Notification

Level 2



Narrative	<p>Automated Batch process run on renewing profession. Process will select random sample of either 2.5% or 5% from registrants who have been on the register for 2 years or more. Process will, in addition to the audit sample, select all registrants who have deferred in a previous CPD cycle.</p> <p style="color: blue;">LISA record stamped with unique CPD number. Only one CPD number per registrant</p>	<p style="color: blue;">Notification letter will explain process and will include a proforma for the registrant to fill in - this will be stamped with CPD number.</p> <p style="color: blue;">LISA moves CPD progress tracking status to -3 month notification sent</p>	<p>Registrant continues along standard renewal route, but will also receive a CPD reminder</p>	<p>If a registrant fails to pay and sign they will continue along the standard renewal route.</p> <p>If they submit a CPD profile when returning an incomplete renewal form this will be acknowledged and stored but will progress no further until renewal is complete.</p> <p>If no CPD profile is received they will receive an additional reminder with the final renewal notification</p>	<p>All registrants selected for CPD will be registered conditionally until the CPD assessment is complete & once they have paid and signed. LISA must be able to recognise whether a registrant has been selected for CPD as this will drive the status they go into when they renew through the ICR process.</p> <p>LISA will reflect this status, but it will not be evident on the online register or on the certificate.</p>	<p style="color: blue;">Once the registrant has successfully completed CPD, LISA will be updated.</p> <p style="color: blue;">If the registrant loses their proforma they will be able to request a new proforma as they can request a new renewal form</p>
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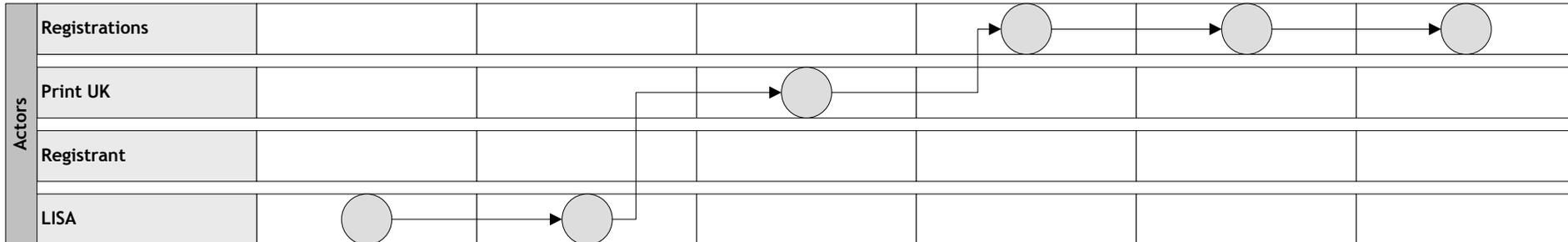
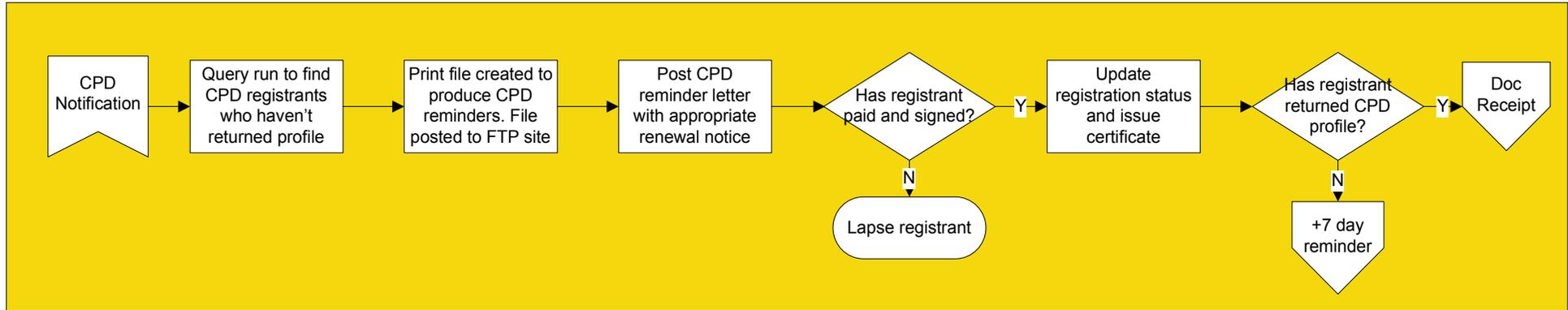
CPD Processing

Level 2

Process runs at any time between -1 month and day 0

-1 month CPD reminder

Level 3



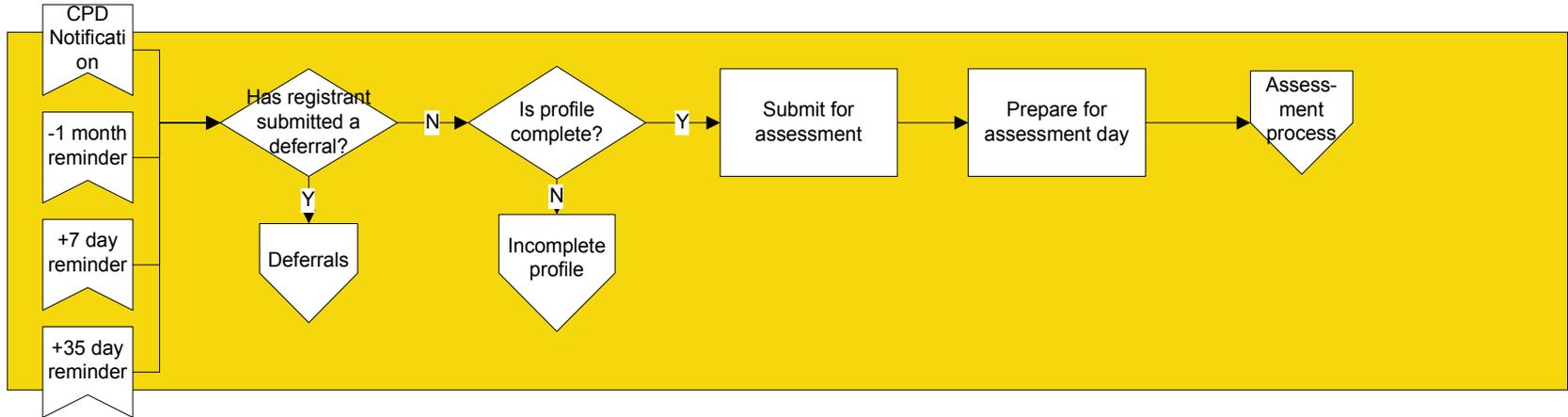
Narrative	Query will pick up all registrants that have not returned a CPD profile.	LISA moves CPD progress tracking status to -1 month notification sent	Reminder letter and new proforma will be sent	Regardless of whether a registrant has returned a CPD profile, if they do not pay and sign they will be lapsed on day 1 of the new professional cycle as per usual	All registrants selected for CPD will be registered conditionally until the CPD assessment is complete. LISA and the certificate will reflect this status, but it will not be evident on the online register. Once the registrant has successfully completed CPD, LISA will be updated

CPD Processing

Level 2

Document receipt

Level 3

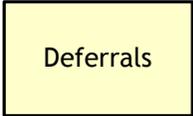


Actors	Registrations	●	→ ●	→ ●	→ ●	
	Partner Manager				→ ●	
	Automated Process				→ ●	
	CPD assessor					

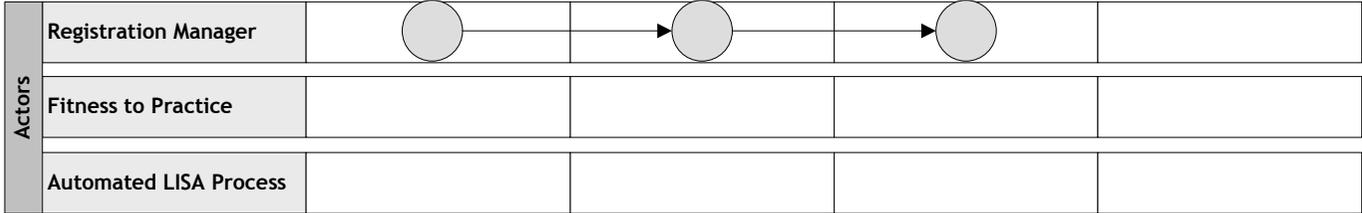
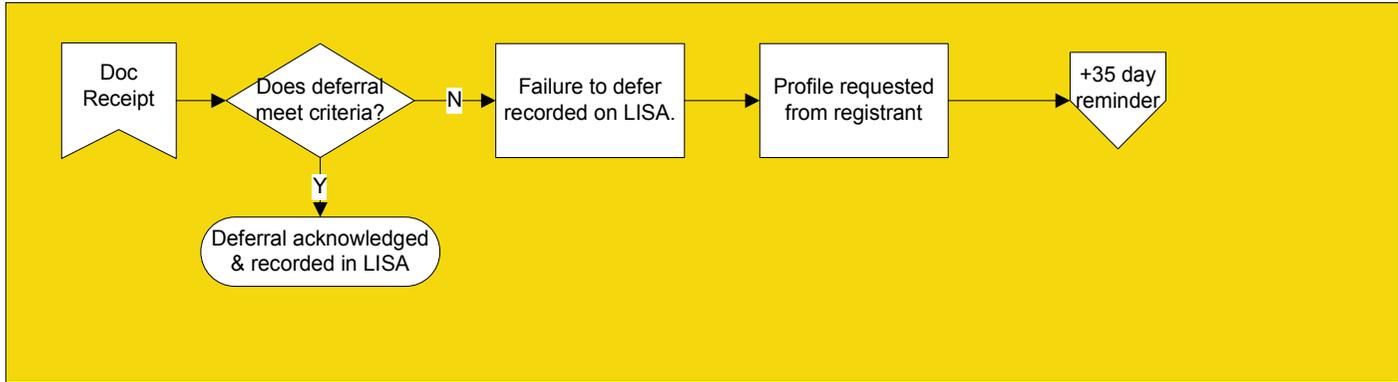
Narrative	<p>If registrant has submitted a request for a deferral this is assessed by HPC.</p>		<p>Standard letter sent to registrant informing them that profile has been received.</p> <p>CPD progress tracking status changed to Complete profile received & tracking date stamped by LISA</p> <p>Profile scanned and uploaded to registrant's record</p>	<p>Date of assessment input into LISA query & stored on control sheet</p> <p>Query run on LISA to select X number of profiles (dependent on number of profiles that can be done in one day)</p> <p>2 assessors assigned to each registrant (1 same part of register) dependent on availability of assessors & number of assessments that can be done in 1 day - names of assessors recorded on control sheet</p>	<p>Profiles of registrants selected downloaded into a printable file.</p> <p>CPD progress tracking status changed to Under scrutiny</p>
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CPD Processing

Level 2



Level 3



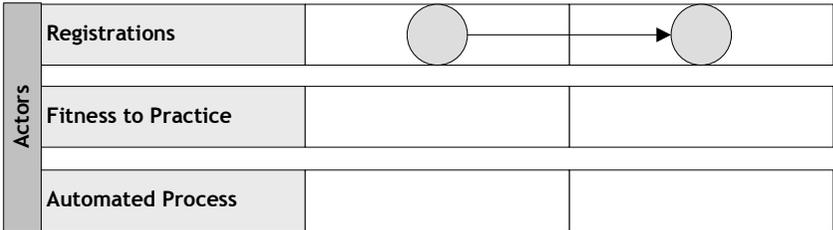
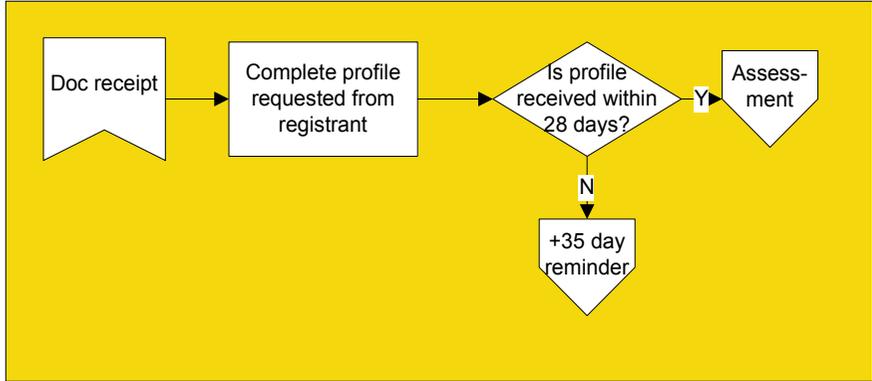
Narrative	<p>Registration Manager scans & uploads deferral letter & chooses Deferred as the CPD status. This status will only be accessible by Reg Managers. Status date stamped by LISA.</p> <p>Record greyed out. Only FTP and Reg managers can change status to reactivate record. Persists until next professional cycle.</p> <p>All registrants who defer will automatically be chosen for audit in the next professional cycle</p>	<p>Deferral rejection reason entered into free text field, CPD progress tracking changed to deferral rejected. Tracking date stamped by LISA.</p> <p>All reminders will be sent based on tracking date NOT professional cycle date.</p>	<p>Standard letter selected and relevant tick boxes selected</p> <p>Letter printed and posted to registrant.</p> <p>Registrant effectively returns to the beginning of the cycle.</p>	
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CPD Processing

Level 2

Incomplete profile

Level 3



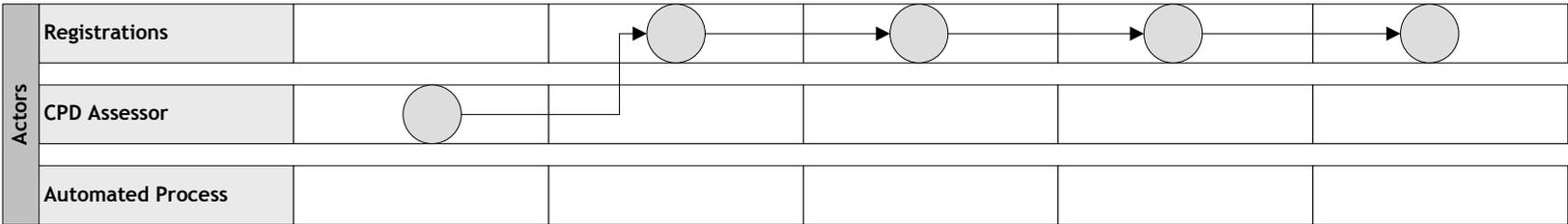
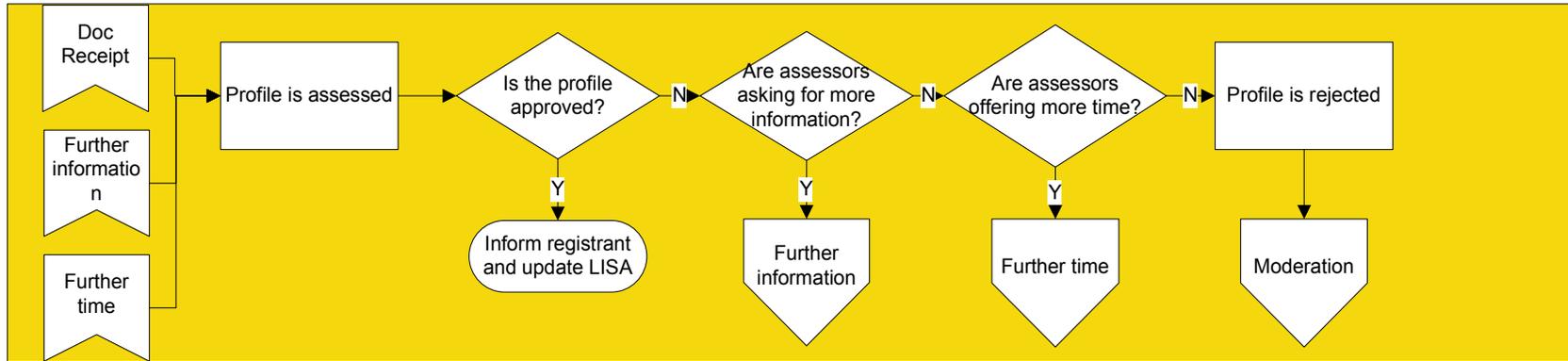
Narrative	Standard letter template accessed. Information missing tickboxes selected.	Reminders will be sent out based on the date that is entered NOT on the professional cycle date
	Letter printed and posted back to registrant with profile.	Registrant effectively returns to the beginning of the cycle.
	Change CPD progress tracking status to Incomplete profile received and tracking date stamped by LISA	

CPD Processing

Level 2

Assessment process

Level 3

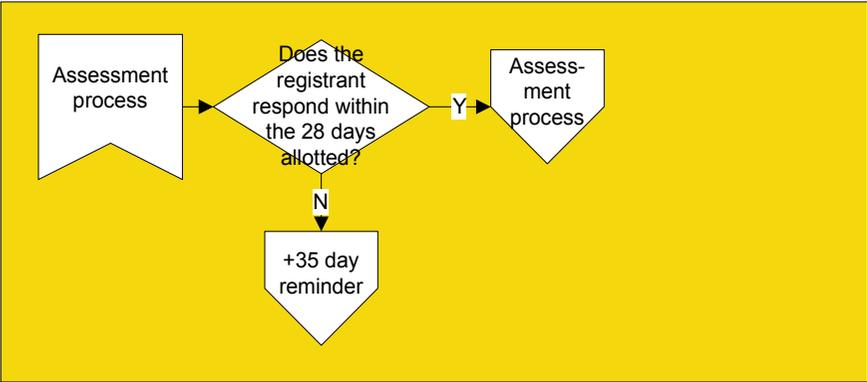


Narrative	<p>The profile is assessed by 2 CPD assessors.</p> <p>One of the assessors will be from the same profession as the registrant.</p>	<p>CPD status changed to accepted.</p> <p>LISA marks registrant to be included in batch run to send out CPD accepted letter.</p> <p>LISA automatically updates registration status to Registered rather than Conditionally Registered.</p>	<p>If the assessors are unable to make a decision based on the information provided they will ask for more information to be submitted so a decision can be reached.</p> <p>Standard letter sent to registrant informing them of information required. Tracking status changed to Under Scrutiny - Further Information. Tracking status date stamped by LISA.</p> <p>All reminders based on the tracking date NOT professional cycle.</p>	<p>An assessor will decide to give up to a further 3 months.</p> <p>Standard letter sent to registrant informing them they have x amount of time to meet standards. Date of Further time deadline entered. Tracking status changed to Under Scrutiny - Further Time. Tracking status date stamped by LISA.</p> <p>All reminders based on the tracking date NOT professional cycle.</p>	<p>If the assessors feel that the profile does not meet the standards, and feel additional time would not be sufficient to bring it up to standard it will be rejected.</p> <p>Standard letter sent to registrant informing them of outcome. Tracking status changed to Rejected awaiting comment. Tracking status date stamped by LISA.</p> <p>All reminders based on the tracking date NOT professional cycle.</p>
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CPD Processing

Further information

Level 2



Level 3

Actors	Registrations		
	CPD Assessor		
	Automated Process		

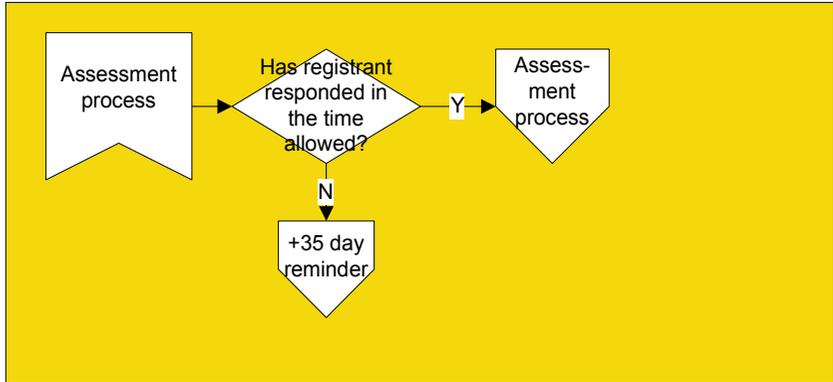
Narrative		
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CPD Processing

Level 2

Further time

Level 3



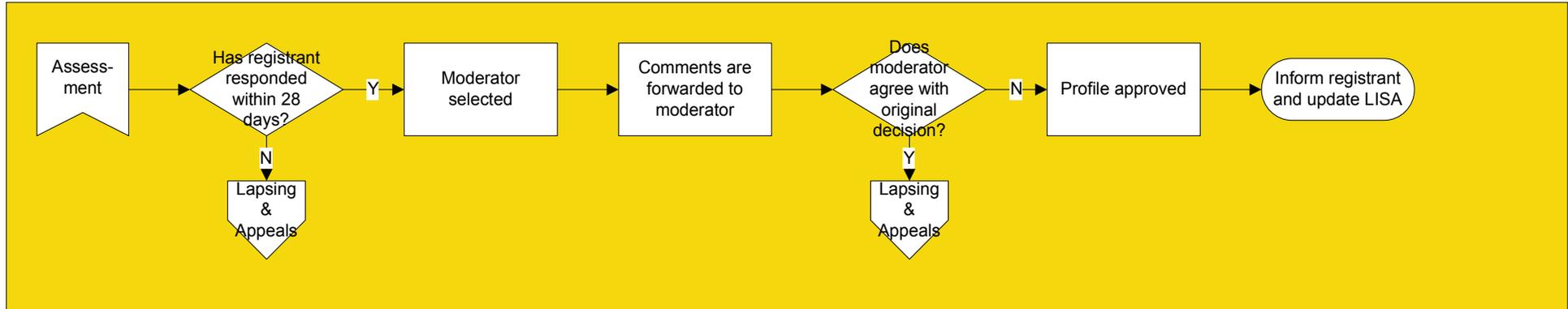
Actors	Registrations		
	Print UK		
	Registrant		

Narrative		
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CPD Processing

Level 2

Moderation



Level 3

Actors	Registrations					
	Moderator					
	Registrant					

Narrative	Batch run moves all registrants into CPD progress tracking status Rejected - 28 day appeal period.	Comments scanned and uploaded into LISA Moderator name stored in LISA.	Moderator provided with CPD profile and proforma for comments and decision	Moderator proforma scanned and uploaded CPD progress tracking status changed to Rejected - 28 day appeal period.	Decision recorded in free text field	Standard letter sent to registrant.
	Anyone in this CPD progress tracking status will be immune from 'administrative' lapsing (same behaviour as those under investigation)	CPD progress tracking status changed to Rejected under moderation. Date stamp entered into Date sent for moderation field		Anyone in this CPD progress tracking status will be immune from 'administrative' lapsing (same behaviour as those under investigation)		CPD progress tracking status changed to Complete CPD status changed to Accepted. LISA automatically moves registration status to Registered, rather than Conditionally registered

Appendix 3 - Possible Registrations System Statuses

DRAFT

Date	Ver.	Dept/Cmte	Doc Type	Title	Status	Int. Aud.
2007-03-15	a	POL	PPR	Possible LISA CPD statuses	Draft DD: None	Public RD: None

Straight-forward processing

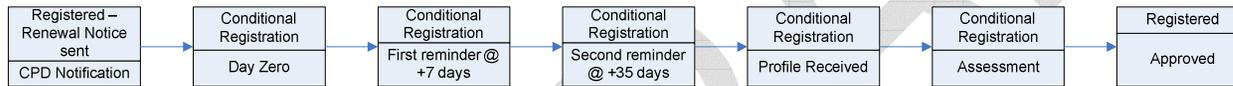
Straight forward registration with profile received before day zero



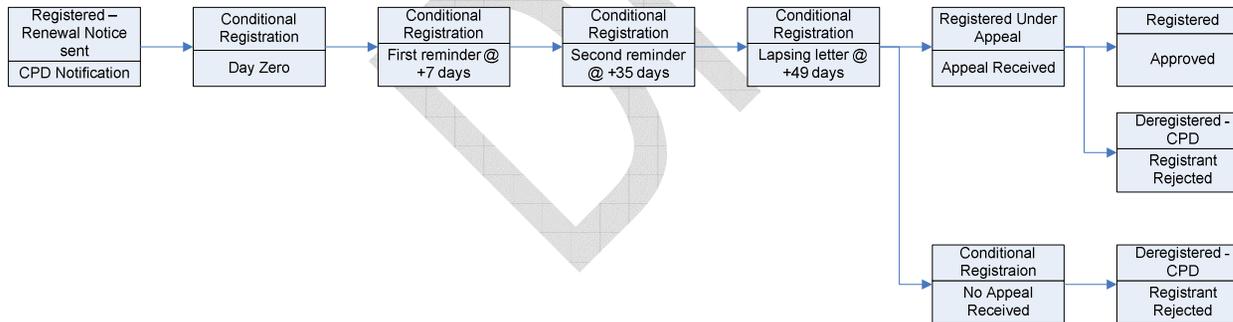
Straight forward registration with profile received after day zero



Straight forward registration where reminders need to be sent after day zero

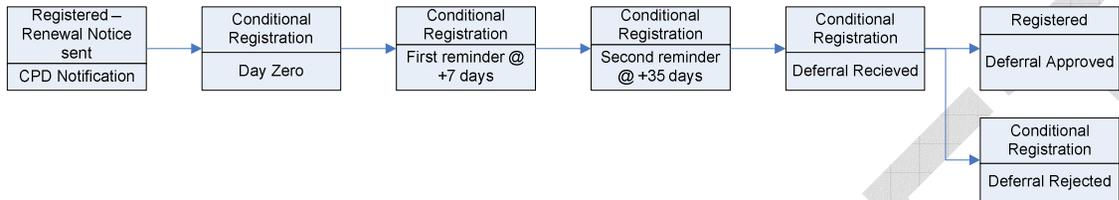


Registrant fails to submit a profile but appeals when receives notification of deregistration

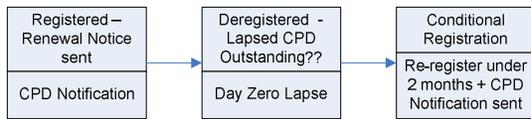


Deferrals and Lapsing

Registrant submits a deferral



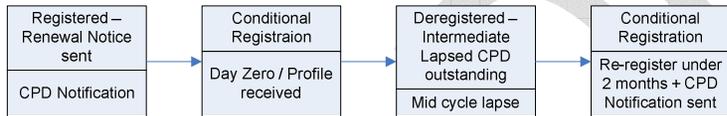
Registrant lapses at the end of the professional cycle and returns to the register in under 2 months



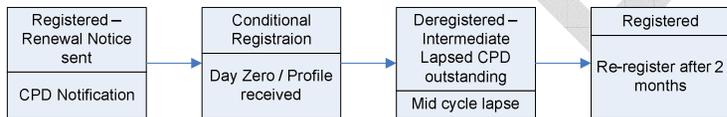
Registrant lapses at the end of the professional cycle and returns to the register in over 2 months



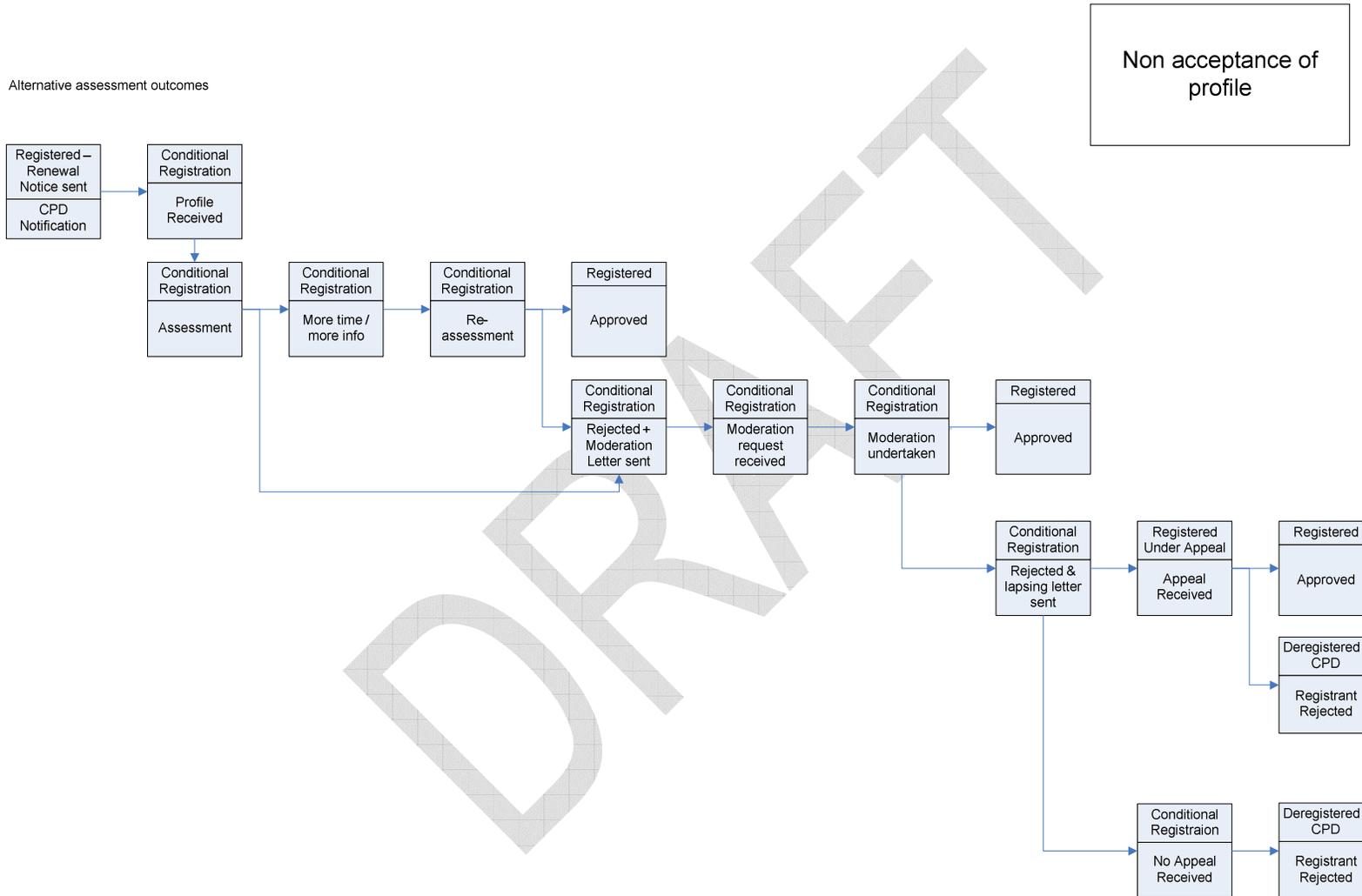
Registrant lapses mid - cycle and returns to the register in under 2 months



Registrant lapses mid - cycle and returns to the register in over 2 months



Alternative assessment outcomes



Non acceptance of profile

Date
2007-03-15

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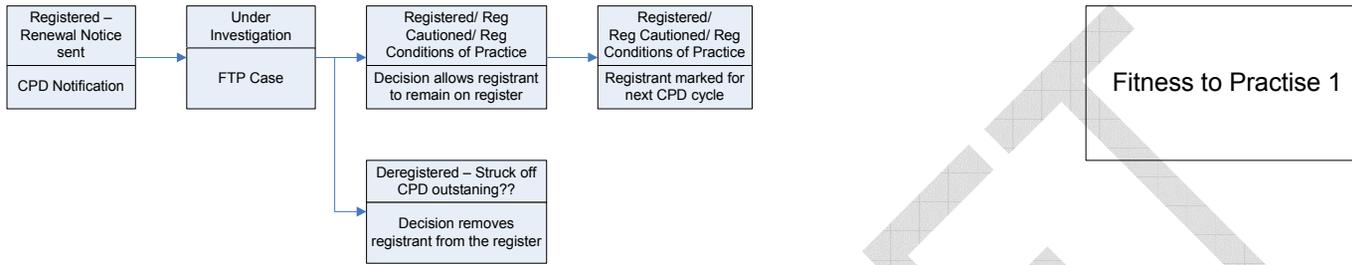
Doc Type
PPR

Title
Possible LISA CPD statuses

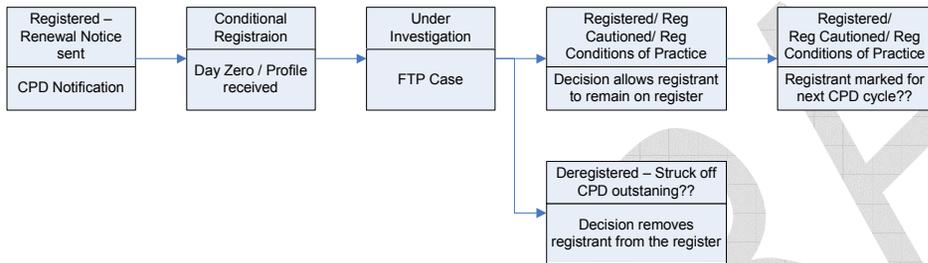
Status
Draft
DD: None

Int. Aud.
Public
RD: None

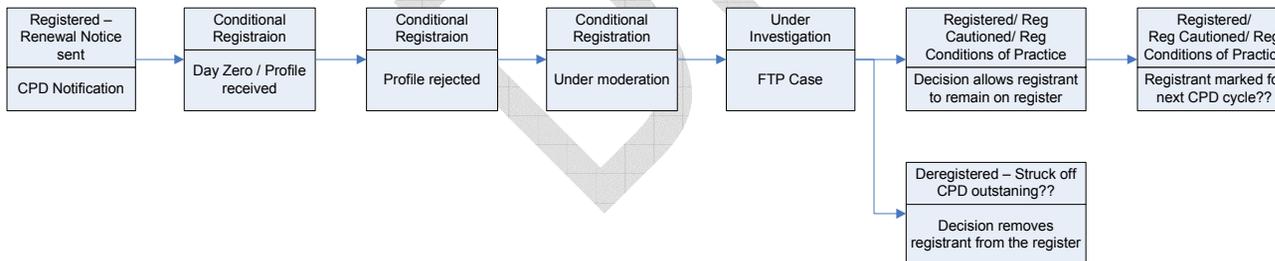
Registrant goes into FTP before a profile is received and whilst in renewal



Registrant goes into FTP after the profile has been received or after the end of the professional cycle



Registrant goes into FTP once the profile has been rejected and is being moderated



Date
2007-03-15

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Dept/Cmte
POL

Doc Type
PPR

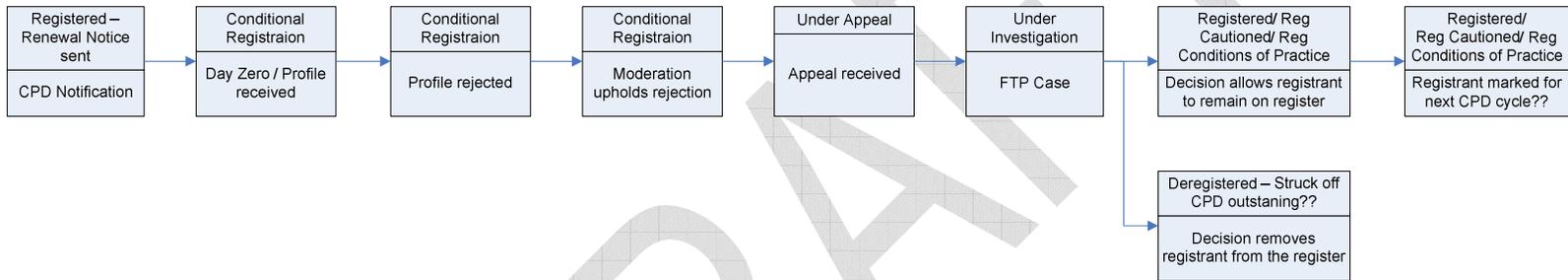
Title
Possible LISA CPD statuses

Status
Draft
DD: None

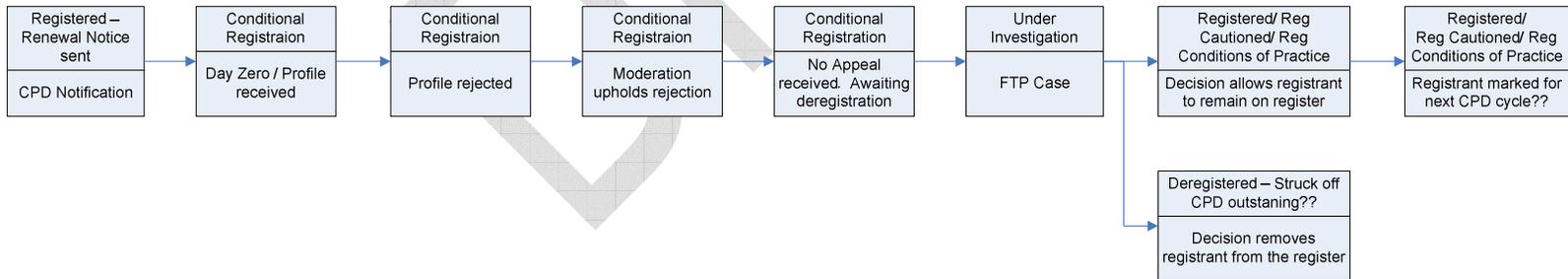
Int. Aud.
Public
RD: None

Fitness to Practise 2

Registrant goes into FTP when appealing decision to be de-registered due to an inappropriate profile



Registrant goes into FTP whilst awaiting to be de-registered due to an inappropriate profile (28 day appeal period)



Date
2007-03-15

Ver.
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Dept/Cmte
POL

Doc Type
PPR

Title
Possible LISA CPD statuses

Status
Draft
DD: None

Int. Aud.
Public
RD: None