

Consultation on sampling continuing professional development records for review

September 2016

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The deadline for responding to this consultation is Monday 31 October 2016.

About the GPhC

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in England, Scotland and Wales. It is our job to protect, promote and maintain the health, safety and wellbeing of members of the public by upholding standards and public trust in pharmacy.

Our main work includes:

- setting standards for the education and training of pharmacists, pharmacy technicians, and approving and accrediting their qualifications and training
- maintaining a register of pharmacists, pharmacy technicians and pharmacies
- setting the standards that pharmacy professionals have to meet throughout their careers
- investigating concerns that pharmacy professionals are not meeting our standards, and taking action to restrict their ability to practise when this is necessary to protect patients and the public
- setting standards for registered pharmacies which require them to provide a safe and effective service to patients
- inspecting registered pharmacies to check if they are meeting our standards.

Overview

The GPhC is consulting until **Monday 31 October 2016** on a new approach to calling in continuing professional development records – completed by pharmacy professionals – for review. You can find out more about how we do this at the moment by going to:

www.pharmacyregulation.org/education/continuing-professional-development

We are the regulator for pharmacists, pharmacy technicians and registered pharmacies in Great Britain. It is our job to protect, promote and maintain the health, safety and wellbeing of members of the public, and in particular those who use or need the services of pharmacy professionals or the services provided at a registered pharmacy.

One of the ways we do this is by requiring **all** pharmacists and pharmacy technicians to carry out continuing professional development (CPD) activities every year. We also ask registrants to keep records of their CPD activities and submit them for review, usually every five years.

99.7% of all the pharmacy professionals' records we checked over the last five years met our requirements at the first attempt.

We have learnt that our present approach of checking all pharmacy professionals every five years

is not proportionate or effective at bringing about the professional behaviours of recording and reflecting upon learning and development activities.

In future we do not want to call in the CPD records of all pharmacy professionals. Instead, we want to randomly select a smaller sample of pharmacy professionals each year, and ask them to submit their records for review. We also want to continue to select pharmacy professionals who have had difficulty meeting our requirements, to make sure they have improved their recording of activities.

We have evidence from research and a pilot study in 2016 to show that this is likely to mean that pharmacy professionals will still carry out and record their CPD activities. The new approach will allow us to focus our attention toward the 0.3% who find it more challenging to meet our requirements.

This consultation document has two sections:

What we are changing and why: this explains what we do now and what we propose to do. It sets out what we have taken into account when considering making the change; and it explains why we want to make a change.

The change to the continuing professional development framework: this includes the draft change to the CPD framework and what it means in practice.

The consultation process

We have considered a range of information in developing this consultation: in particular **the feedback we received from our review of our present CPD requirements**. We now want to test our thinking to make sure our new approach meets the expectations of pharmacy professionals and the people using pharmacy services. Please let us know what you think about the proposal described in this document.

The consultation will run for six weeks and will close on Monday 31 October 2016. During this time we welcome feedback from individuals and organisations. We will send this document to a range of stakeholder organisations, including professional representative bodies, employers, education and training providers, and patients' representative bodies.

We hope you will read this consultation and consider responding. You can get more copies of this document on our website at: **www.pharmacyregulation.org/continuing-professional-development-2016-consultation** or you can contact us if you would like a copy of the document in another format (for example, in a larger font or in a different language).

How to respond

You can respond to this consultation in a number of different ways. You can fill in the questionnaire at the end of this document or go to **www.pharmacyregulation.org/continuing-professional-development-2016-consultation** and fill in an online version there.

If you fill in the questionnaire in this document, please send it to:

- **consultations@pharmacyregulation.org** with the subject 'Sampling CPD records for review'

or post it to us at:

- **Sampling CPD records for review
Consultation response
CPD Team
General Pharmaceutical Council
25 Canada Square
London
E14 5LQ**

Comments on the consultation process itself

If you have concerns or comments about the consultation process itself, please send them to:

- **feedback@pharmacyregulation.org**

or post them to us at:

- **Governance Team
General Pharmaceutical Council
25 Canada Square
London
E14 5LQ**

Please **do not** send consultation responses to this address.

Our report on this consultation

Once the consultation period ends, we will analyse the responses we receive. The council will receive the analysis at its meeting in December 2016, and will take the responses into account when considering the final changes we want to make to our current CPD framework document.

We will also publish a summary of the responses we receive and an explanation of the decisions taken.

You will be able to see this on our website

www.pharmacyregulation.org

Part 1: What we are changing and why

We are consulting on a change to paragraph 3.1 of our CPD framework document. We are proposing a small change to the wording which will change our approach to checking the CPD records of pharmacy professionals.

At the moment we usually check the CPD records of **all** pharmacists and pharmacy technicians every five years. This means pharmacy professionals are asked to submit their records of CPD at least every five years, but they are expected to be making records continuously.

We want to keep our approach the same (especially the expectation that recording is done continuously) **apart from** the way we call records for review. We want to randomly select **at least** 2.5% of pharmacy professionals (about 1 in 40) each year.

In developing this approach we took into account:

- what we heard through our review of our present approach which drew on the views of pharmacy professionals and the people who review their CPD records
- what we learnt from reviewing the records of everyone on our professional registers over the last five years
- what we plan to do as we continue to develop our wider approach to making sure that the standards for pharmacy professionals are met throughout their careers
- what other professional regulators do.

We think our proposed approach is more proportionate, effective, flexible, targeted and cost effective – as well as more in line with the expectations of the people who use pharmacy services and people working in pharmacy. However, we want to test this through this consultation.

We want to make this change because:

- 99.7% of pharmacy professionals over the last five years have met our CPD requirements at the first attempt.
- Pharmacy professionals have told us that they do CPD activities all the time, but tend only to record them every five years when we ask to review them. They also said that we needed to do things differently to encourage more regular recording of activities.
- In future we plan to introduce more checks to make sure all pharmacy professionals have recorded their CPD activities every year. We want our review of CPD to focus on giving better feedback to pharmacy professionals as individuals and as a group.
- Other regulators have a variety of approaches, but many use a sampling approach already. Given what we know about how well pharmacy professionals do when we ask them to submit records it seems sensible and proportionate for us to adopt a similar approach.
- Our pilot study in 2016 shows us the new approach is more proportionate and effective.

Part 2: The change to the continuing professional development framework

Introduction

The only change we are proposing to the CPD framework document is to the text shown in **bold** in paragraph 3.1. This reads:

‘The GPhC may ask you to submit a CPD record for review at any time. **Normally, this will happen every five years**, but in some cases you may be asked to submit your CPD record for review more frequently than this, for example if you have been required previously to undertake remedial measures following a review of your CPD record or if you have a history of poor compliance with any of our standards.’

We want to change this paragraph to read:

‘The GPhC may ask you to submit a CPD record for review at any time. **Usually, we will call in the CPD records of a random sample of registrants each year. If you meet the GPhC’s CPD requirements we will not ask you again the following year.** In some cases you may be asked to submit your CPD record for review more frequently than this, for example if you have been required previously to undertake remedial measures following a review of your CPD record or if you have a history of poor compliance with any of our standards.’

These changes mean:

- We can focus our attention and resources on pharmacy professionals who find it harder to meet our requirements at the first attempt. And we can learn more about the reasons why they find it harder.
- Pharmacy professionals are still expected to continuously do and record CPD activities.
- We can use a sample to understand how well all pharmacy professionals are likely to be meeting our requirements and adapt our approach over time. For example, if more pharmacy professionals from a sample found it harder to meet our requirements we might review a bigger percentage the following year.
- Pharmacy professionals may be called more often than every five years but, usually, no more often than every two years.
- Pharmacy professionals may be called less often than every five years.
- We will introduce further checks in future for all registrants to make sure CPD is recorded yearly, and consult on these proposed changes in 2017.

How we will use your responses

After the consultation, we will publish a report summarising what we heard. We may quote parts of your response in that report or in other documents. But if you respond as a private individual, we will not use your name unless you say we can.

We may publish your response in full unless you tell us not to. If you want your response to stay confidential, you should explain why you believe the information you have given is confidential. However, we cannot guarantee that confidentiality can be maintained in all circumstances.

The GPhC may need to disclose information under the laws covering access to information (usually the Freedom of Information Act 2000).

If your response is covered by an automatic confidentiality disclaimer generated by your IT system, this will not in itself be binding on the GPhC.

Any diversity monitoring information you give us will be used to review the effectiveness of our consultation process. It will not be part of a published response.

Consultation response form

Response to the consultation on standards for pharmacy professionals

If you want your response to stay confidential, please explain why you think the information you have given is confidential. We cannot give an assurance that confidentiality can be maintained in all circumstances.

☐ Please remove my name from my published response

Please tell us if you have any concerns about our publishing any part of your response:

Background questions

First, we would like to ask you for some background information. This will help us to understand the views of specific groups, individuals and organisations and will allow us to better respond to those views.

Are you responding:

☐ as an individual – please go to section A

☐ on behalf of an organisation – please go to section B

Section A – Responding as an individual

Please tell us your:

name:

address:

email:

Where do you live?

- ☐ England
- ☐ Scotland
- ☐ Wales
- ☐ Northern Ireland
- ☐ other (please give details)

.....

Are you responding as:

- ☐ a member of the public
- ☐ a pharmacy professional – please go to section A1
- ☐ a pre-registration trainee
- ☐ a student
- ☐ other (please give details)

.....

Section A1 – Pharmacy professionals

Are you:

- ☐ a pharmacist
- ☐ a pharmacy technician

Please choose the option below which best describes the area you mainly work in:

- ☐ community pharmacy
- ☐ hospital pharmacy
- ☐ primary care organisation
- ☐ pharmacy education and training
- ☐ pharmaceutical industry
- ☐ other (please give details)

.....

Section B: Responding on behalf of an organisation

Please tell us your:

name:

job title:

organisation:

address:

.....

.....

email:

a contact name for enquiries:

contact phone number:

Is your organisation a:

☐ pharmacy organisation

☐ non-pharmacy organisation

Please choose the option below which best describes your organisation:

- ☐ body or organisation representing professionals
- ☐ body or organisation representing patients or the public
- ☐ body or organisation representing a trade or industry
- ☐ community pharmacy
- ☐ corporate multiple pharmacy
- ☐ independent pharmacy
- ☐ NHS organisation or group
- ☐ research, education or training organisation
- ☐ government department or organisation
- ☐ regulatory body
- ☐ other (please give details)

.....

Consultation questions

We are particularly interested in your views on the following points, although we welcome your comments on any issues that you want to raise about the change to the CPD framework.

Clarity

The changes we are making should be clear. Here is the amended paragraph with the new text shown in **bold**:

‘The GPhC may ask you to submit a CPD record for review at any time. **Usually, we will call in the CPD records of a random sample of registrants each year. If you meet the GPhC’s CPD requirements we will not ask you again the following year.** In some cases you may be asked to submit your CPD record for review more frequently than this, for example if you have been required previously to undertake remedial measures following a review of your CPD record or if you have a history of poor compliance with any of our standards.’

1 Is the amended paragraph clear?

Yes / No

1a What else, if anything, should be added to or removed from the paragraph?

Sampling

Asking for a sample of CPD records to review each year should encourage more regular recording of CPD activities. It will allow us to introduce more yearly administrative checks over time and focus our attention on pharmacy professionals who may find it harder to meet our requirements.

2 Do you agree with our new approach of taking a sample of registrants to review their CPD records?

Yes / No

2a If you do not agree with this approach, please explain why.

Equality analysis

We believe the change to the framework should have positive implications for people. We have not identified any implications that would discriminate against or unintentionally disadvantage any individuals or groups.

- 3 Are there any aspects of the change we are proposing that could have a negative impact on patients, members of the public, pharmacists, pharmacy technicians, or any other groups?**

Yes / No

- 4 Do you have any comments on the potential impact of the change to the framework?**

Equality monitoring

At the GPhC, we are committed to promoting equality, valuing diversity and being inclusive in all our work as a health professions regulator, and to making sure we meet our equality duties.

We want to make sure everyone has an opportunity to respond to our consultation on standards for pharmacy professionals. This equality monitoring form will provide us with useful information to check that this happens. You do not have to fill it in, and your answers here will not be linked to your consultation responses.

What is your ethnic group?

Please tick one box

White

- ☐ British
- ☐ Irish
- ☐ Other

Black or Black British

- ☐ Caribbean
- ☐ African
- ☐ Other

Mixed

- ☐ White and black Caribbean
- ☐ White and black African
- ☐ White and Asian
- ☐ other mixed (please give more information in the box below)

Asian or Asian British

- ☐ Indian
- ☐ Pakistani
- ☐ Bangladeshi
- ☐ other Asian (please give more information in the box below)
- ☐ Chinese or Chinese British
- ☐ Other ethnic group (please give more information in the box below)

What is your age?

Please tick one box

- ☐ under 20
- ☐ 20 – 29 years
- ☐ 30 – 39 years
- ☐ 40 – 49 years
- ☐ 50 – 59 years
- ☐ 60 + years

What is your gender?

Please tick one box

- ☐ Male
- ☐ Female
- ☐ Other

What is your religion?

Please tick one box

- ☐ None
- ☐ Christian
- ☐ Buddhist
- ☐ Hindu
- ☐ Jewish
- ☐ Muslim
- ☐ Sikh
- ☐ Other (please give more information in the box below)

Do you consider that you have a disability?

Please tick one box

- ☐ Yes
- ☐ No

Appendix A: Collated consultation questions

- 1 Is the amended paragraph clear?
 - 1a What else, if anything, should be added to or removed from the paragraph?
- 2 Do you agree with our new approach of taking a sample of registrants to review their CPD records?
 - 2a If you do not agree with this approach, please explain why.

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