

**Guidance on checking Continuous Professional Development
Returns for 2016/ 17 and auditing requirements**

**Guidance for chiropractors on the process the
GCC takes to check CPD returns**

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**General
Chiropractic
Council**



Contents

Contents	Page
Introduction	3
Checking CPD summary records	3
Annual CPD auditing of a percentage of registrants	9
Other related areas	12
Do you need more information?	13

Introduction

How do you confirm I have undertaken CPD?

We confirm that CPD has been undertaken in two ways:

1. we check the CPD summary record that every one of our registrants submits to confirm that they have met the requirements of the CPD scheme
2. we audit the CPD of a percentage of our registrants each year to check that what they have claimed on their CPD summary form can be backed up by evidence.

Why do you check my CPD?

We carry out this checking and auditing to:

- emphasise the importance of CPD in maintaining registration
- deter any registrants who may see this as an unimportant part of professional life
- provide assurance to the public that chiropractors as professionals, and we as the regulator, take ongoing professional development seriously and are committed to patient safety and care.

Checking CPD Summary Records

What happens when I submit my CPD summary record?

When a chiropractor sends in their CPD summary record, either online or by post, we check to see that the individual is able to confirm that s/he has met the requirements of the CPD scheme that year. We do this as soon as possible after receiving the CPD summary record. This check is then logged in our system.

Who does the checking and how do they do this?

Our CPD Rules talk solely about the Registrar in relation to CPD. Of course, in reality this is undertaken by administrators with the Registrar having the final decision making powers. Trained CPD assessors check each CPD summary record to confirm that all of the requirements of the CPD scheme have been met.

If an assessor is unsure about any aspect of a return, they discuss it with a senior member of staff.

The process is quality assured by someone who is not directly involved in the process themselves. Their role is to sample a percentage of the decisions that have been made on the returns to ensure that there is consistency over time and across the people involved in the process.

What criteria are used to check the returns?

We use the following criteria to check each CPD summary return.

1. The individual has submitted their CPD return by the deadline of 30 September – our CPD year runs from 1 September to 31 August each year so individuals need to submit their forms by the end of the following month which is the last day of September.
2. The CPD record contains all the necessary information. Specifically that the registrant:
 - a. has completed and recorded at least one complete learning cycle as follows:
 - i. reflecting on and assessing learning needs and interests within the context of professional practice
 - ii. planning how to meet their identified learning needs or interests and recording this in a personal development plan
 - iii. undertaking CPD in accordance with the personal development plan
 - iv. evaluating the CPD undertaken and its effectiveness in meeting the learning needs or interests they identified
 - b. has undertaken at least 30 hours of learning, of which at least half – 15 hours – is learning with others
 - c. is claiming activities as CPD which relate to his/her professional learning and development
 - d. has confirmed that the CPD summary form is a fair and true record of their CPD.
3. The CPD summary form that has been submitted changes across years to reflect the changes that will occur in an individual's professional development needs.
4. If a paper CPD record has been submitted, we confirm that it is legible enough for us to check it.

Why are you no longer checking the categories of CPD relating to improving patient care or developing the profession?

In the past we have asked registrants to state whether their CPD related to improving patient care or developing the profession. Through our research, we have found that these categories are confusing to registrants and there is a lack of clarity across the profession as to what they mean. The categories as such are not included in our current CPD Rules (dated 2004) although are referred to broadly within the general definition of CPD.

As the Rules do not specifically require registrants to specify which category their learning falls into, the Council decided at its meeting on 31 March 2015 that from now onwards we will not ask registrants to categorise their learning in this way.

Unfortunately until we gain greater clarity from the Government about when we might change the current Rules or when broader healthcare professional regulation will be changed, we have little room for manoeuvre with changing other aspects of our CPD scheme.

We will continue to use the definition in the Rules to guide our decisions on CPD. The Rules define CPD as:

“CPD means training which comprises lectures, seminars, courses, practical sessions, individual study or other activities undertaken by a registered practitioner which could reasonably be expected to advance his professional development as a chiropractor or contribute to the development of the profession of chiropractic”.

We describe how we interpret this more fully in our guidance on CPD (2016/ 17) - it can be summed up as learning and development undertaken by a chiropractor that is related to the profession of chiropractic.

What happens after the returns have been checked?

There are two outcomes to our check of CPD returns:

1. the CPD summary record meets all of the criteria – in which case we will notify registrants as soon as we have completed our check of their summary.
2. the CPD summary record does not show that all of the criteria have been met – if this is the case, we ask the registrant for further information.

Why do you ask chiropractors to supply further information?

If what was initially submitted does not show that all of the CPD criteria have been met, we ask for further information.

What sort of further information might be required?

The further information we require can take different forms depending on which of the criteria have not been met.

- If you have not completed all of the relevant parts of the form (eg you have not signed your CPD statement), then we ask you to do so and resubmit the form.
- If the information you have submitted is too general to identify if the criteria have been met, then we will ask you for more specific information.

For example, if someone states that their learning need is ‘to improve their practice’ we will ask them to amend their learning need to clarify on which particular aspects of their practice they were focusing. Or if they make a very general statement about the learning activities they have undertaken (eg I went to a conference), we will ask for the summary to be amended to describe how this meets the CPD requirements. Or we will ask someone to clarify any learning cycle or the nature of any learning activities that do not appear to relate to their professional practice as a chiropractor.

- If you have included activities as CPD that do not relate to your professional learning and development, then we will ask if you have actual learning activities to meet the hours requirements.

For example, an individual might suggest that they undertook some teaching so this was CPD, however this is not for them a learning activity (although it would have been for the people who were being taught). The individual has probably undertaken other learning that they can use in place of their original suggestion, such as the activities they undertook to prepare for their teaching, which might include making sure the content was up-to-date.

Once the further information has been received, it is subject to the same checks as described above.

1. If the return, including the additional material that has been submitted, meets the criteria then you will be signed off. CPD assessors will do this when the additional material clearly meets the criteria, or, if there is still some doubt, they involve the Director of Education, Registration and Standards. The decision is recorded and you will be told of the outcome.
2. If, having gained further information and supporting statements, it is still unclear that the CPD return meets all of the criteria then:
 - a. you will be asked to provide a statement in support of your initial or subsequent return to enable it to be more clearly understood – you do not have to do this but are encouraged to do so
 - b. the information - the CPD summary and any supporting statement - is referred to the Registrar for a final decision consistent with Rule 6 of the GCC (CPD) Rules 2004.

What if circumstances make it difficult for me to complete my CPD?

If you have exceptional circumstances, for example, an illness or bereavement making it difficult for you to complete the CPD requirements, you may apply to the Registrar for changes to your CPD requirements in that year.

If the Registrar agrees that your circumstances are exceptional, you may be given either some additional time for your CPD to be undertaken or a reduction in the number of CPD hours you have to do in that year. Such a decision applies only to the CPD year in question and is not transferable to other CPD years.

You should inform us about any such problems as soon as you can by filling in the application form available on our website [[here](#)]. This gives you the opportunity to tell us about the issues you are facing in completing your CPD in that year. Do not wait until the end of the CPD year to apply for a modification to the requirements.

If the Registrar needs to look at my CPD return, what do they consider?

If it is necessary to involve the Registrar in considering your CPD return, she will look at all of the information that has been provided by you in order to come to an informed decision. The information will include:

- the CPD summary record
- any supporting statements that you have submitted
- any extenuating circumstances that you have experienced.

The Registrar has a range of options available when making the decision, including:

1. accepting the CPD on the balance of the evidence provided – this might include advising you that you need to improve your CPD summary record in future years
2. waiving all or part of the CPD requirement for that year if you are able to show that you have exceptional circumstances
3. inviting you to provide a further and final statement to inform the Registrar's decision
4. issuing you with a final warning to provide the information within 14 days (as set out in the CPD Rules 2004). After the 14 days has ended, the Registrar will make a final decision based on all of the information provided. The decision will be:
 - a. accepting that the information submitted meets the CPD requirements
 - b. waiving all or part of the CPD due to exceptional circumstances
 - c. referring you to the Investigation Committee
 - d. removing you from the Register.

The Registrar will make a record of the decision and the reasons for it and you will be informed of the outcome.

What happens to people who don't submit a CPD return?

All chiropractors must complete their CPD record summary and submit it to the GCC by the deadline of 30 September. Administrators monitor who has submitted a CPD return and who has not.

Once the 30 September deadline is reached, administrators issue a final warning notice on behalf of the Registrar to any registrant for whom a CPD summary form has not been received. The final warning notice states clearly that the CPD record summary must arrive at the GCC offices within 14 days from the date of the warning notice.

If your CPD record summary does not arrive with the GCC within that 14 day notice period, you are removed from the Register without further notice. This means that it is no longer possible for you to practise as a chiropractor legally in the UK.

Is there a right of appeal about CPD decisions?

There is a right of appeal for any individual who is removed from the Register for not meeting their CPD requirements or for not submitting a CPD return. Click [[here](#)] for more information.

Do individuals who are under investigation for disciplinary matters still need to submit their CPD return?

Yes. Any chiropractor who is on the Register still needs to carry out CPD and submit a CPD return by the 30 September. They will be treated in the same way as any other registrant in relation to CPD.

However if the individual fails to submit their CPD summary record, or further evidence if they have been included in the sample for auditing purposes, then this failure will be referred to the regulation team so it may be considered as a possible additional complaint. If such circumstances were to arise, the Registrar would not remove the chiropractor from the Register due to issues related to their CPD as the investigation and disciplinary process would take precedence.

Annual CPD auditing of a percentage of registrants

Every year we audit the CPD of a percentage of chiropractors to confirm that they can back up - with evidence - what they have stated on their CPD summary form.

How do you decide who should be included in the audit?

We use a random sampling approach for the audit. It is computer generated with those included for audit having completed a full CPD year. The GCC does not deliberately include any individual chiropractor in, or exclude them from, the audit. The size of the sample varies from year to year depending on the capacity of the staff.

Every year administrators run a computer programme, to generate a sample of the register using registration numbers. The random selection for the audit is carried out before the end of the CPD year and is not linked to the checking of CPD returns.

From the registration numbers in the sample, we identify the chiropractors we need to contact to ask them to provide evidence for the audit.

When is a chiropractor told that they are included in the CPD audit?

We let the chiropractors who are to be included in the audit know that they will need to send additional information that CPD year. We do this in early August so if you are selected you have two months in which to provide the information. This is to give you enough time to get any additional information together and send it to us, preferably electronically.

We use the same date for submitting the information for the audit as we do for the CPD summary form – 30 September – so that is easy for everyone to remember.

It also helps to emphasise to everyone in the profession that the audit is a general check of compliance and is not the same as asking individuals to provide more information about their own individual CPD.

What is checked in the audit?

The GCC (CPD) Rules 2004 state that CPD should consist of:

“the completion of at least 30 hours of CPD of which at least 15 hours shall involve the verifiable... participation of the registered chiropractor in learning with others”.

We use this statement as the basis of the audit and ask chiropractors to provide evidence of the 15 hours of learning with others that they have included in their CPD summary form. We do this because:

- this should be something that is relatively easy for chiropractors to provide
- it is a practical aspect of the scheme that can be checked.

What evidence do I need to send you if I am included in the audit?

We ask chiropractors to provide evidence of at least 15 hours of learning with others that is directly related to what has been included in their CPD record summary.

We ask for:

1. one piece of evidence for each learning activity included in the CPD summary record
2. evidence that is from a third party who can verify the individual's participation in the activity.

Examples of evidence that we accept are:

- copies of certificates
- letters of attendance
- letters from other chiropractors or other healthcare professionals when the activity has been more informal (eg a local study group to discuss patient cases)
- emails sent to us directly from the person verifying the CPD.

Each piece of evidence must show:

1. your name as it appears on the Register
2. the date (or dates) of the learning activity
3. the title and/or a description of the learning activity
4. confirmation of your attendance at the learning activity.

We do not accept as evidence (because they cannot be verified):

- emails from the person verifying forwarded to us by someone else
- copies of minutes.

Is there anything I can do to help the process?

To help the CPD process, and to make it as painless and possible, the best thing for you to do is:

1. include on your CPD summary record the learning activities that you have undertaken with others – we know that the vast majority of chiropractors do much more CPD than we ask them to and we are really pleased about this. However, as a regulator we focus on checking that individuals have met the requirements. We consequently focus on ensuring that 15 hours, which is the minimum number of hours that we require chiropractors to learn with others, can be evidenced.

Making sure that the summary CPD record includes at least 15 hours learning with others that can be easily evidenced will probably save you and us time.

2. check that you have one piece of evidence for each learning activity with others on your CPD summary record
3. confirm that each piece of evidence contains all the necessary details.

You must not:

1. fax through evidence of your record as this can be a very unreliable method
2. submit circumstantial evidence (eg receipts, travel documents, personal lecture notes) as these only imply involvement in a learning activity and do not verify it
3. submit textbooks (as these do not provide evidence of attendance at a learning event or evidence of learning)
4. submit original documents (as there is a risk of them getting lost in transit).

What criteria do you use to assess the audit evidence?

We use the following criteria to assess the evidence supplied.

1. You have submitted your audit evidence to support your CPD return by the deadline of 30 September.
2. There is sufficient audit evidence to cover 15 hours of learning activities with others included on the CPD summary record.
3. The evidence has been supplied by a third party who has verified your participation in the learning activity.
4. Each piece of evidence shows:
 - a. your name as it appears on the Register
 - b. the date (or dates) of the learning activity
 - c. the title and/or a description of the learning activity
 - d. the length of time of the learning activity (if possible)
 - e. confirmation of your attendance at the learning activity.

What audit process do you use?

When the evidence is received by us, we check that the audit evidence received matches the CPD summary return in relation to the 15 hours of learning with others. Once this has been confirmed, we check that the evidence meets all of the criteria.

If the audit of the evidence meets all of the criteria, then you will be told as soon as possible that everything is in order and has been signed off.

If the evidence does not meet the criteria, we contact you to ask for further information or evidence.

What is the timescale?

As we audit evidence of participation in learning with others while we are checking the CPD record summaries, this takes some time to do. If you do not hear from us quickly, there is no need to be concerned as the process is time-consuming.

What happens if I cannot provide evidence of what they have claimed?

We have found over all the years that we have been running this scheme that this is an extremely unusual occurrence. Most, if not all, chiropractors are able to produce evidence of their learning with others with little difficulty.

If we did find that you did not appear to have the evidence for the learning activities with others that you had claimed, then you would be asked to amend your CPD summary record to include additional learning with others and provide the evidence related to these activities.

Why don't you check the quality of the learning cycles that people submit?

We are interested in individuals using learning cycles to improve their practice over time. However we think there are better ways to help individual chiropractors to use a cycle of learning in their own development than by checking and auditing. This is why we are investing in improving our guidance and producing examples of good practice for chiropractors to use. We think this will be more helpful to the profession at this point in time and will also have improved benefits for patients.

Other related areas

How do you use the learning from checking and auditing CPD?

We use the learning from looking at CPD returns in a number of ways including:

- to help evaluate how well the CPD scheme is working and where there appear to be issues - deciding to no longer require registrants to specify whether learning falls within the two CPD categories of improving patient care and developing the profession is one example of this as monitoring over a number of years showed that the categories were not well understood across the profession
- to identify if we can improve our guidance and the support we give to chiropractors – this is why we have decided to develop some examples of good practice related to learning cycles with the aim of encouraging individuals to make better use of them in their professional development
- to see if we need to improve our processes and how we communicate them to the profession and the public – hence this guidance note.

How can I find out about how chiropractors generally have approached their CPD?

Every year we publish a report on how chiropractors have approached their CPD. This includes some very broad statistics on the process, broad learning points and the issues encountered. The aim of the report is to provide:

- feedback to chiropractors on what is working well and areas for possible improvement
- information to members of the public on how the vast majority of the chiropractic profession take their CPD very seriously and how well the CPD scheme is functioning.

Do you need more information?

If you have any questions about the CPD return or CPD audit, contact the Registrations team on: 0207 713 5155. Or email: cpd@gcc-uk.org