

Consultation Document

**On proposed 2020 Continuing Professional
Development Framework**

October 2019

**Consultation will run from 29 October 2019
until 12 noon on 21 January 2020.**

The Pharmaceutical Society of Northern Ireland

- 1 The Pharmaceutical Society of Northern Ireland is the regulatory body for pharmacists in Northern Ireland.
- 2 Our primary purpose is to ensure that pharmacists in Northern Ireland are fit to practise, keep their skills and knowledge up to date and deliver high quality safe care to patients and the public.
- 3 It's the organisation's responsibility to protect and maintain public safety in pharmacy by:
 - Setting and promoting standards for pharmacists' admission to the Register and for remaining on the Register;
 - Maintaining a publicly accessible Register of pharmacists and pharmacy premises;
 - Handling concerns about fitness to practise of pharmacists, acting as a complaints portal and acting to protect patients and the public; and
 - Ensuring high standards of education and training for pharmacists in Northern Ireland.

This Consultation

- 4 This is a consultation on the Pharmaceutical Society NI's proposed 2020 Continuing Professional Development (CPD) Framework for pharmacists which, when adopted, will replace the current Framework.
- 5 The Pharmaceutical Society NI is required by its legislation¹ to outline the 'form and manner' by which pharmacists can meet the requirements for CPD. This means that the Pharmaceutical Society NI must define what CPD a pharmacist must do and how this is submitted for consideration and assessment.
- 6 In considering the issues raised, please read the proposed CPD Framework in conjunction with this consultation document.
- 7 There are five supplementary draft guidance documents associated to the proposed CPD Framework supplied with this consultation. These are to aid the understanding of the operation of the CPD processes. The supplementary draft guidance documents are not being consulted on in this exercise and are subject to change to reflect the final Framework adopted by Council.

¹ Article 4A Pharmacy (Northern Ireland) Order 1976 (as amended).

- 8 There are three pieces of legislation that relate to the CPD Framework. These are:
- Article 4A of the Pharmacy (Northern Ireland) Order 1976 (as amended).
 - The Council of the Pharmaceutical Society of Northern Ireland (Continuing Professional Development) Regulations (Northern Ireland) 2012.
 - The Council of the Pharmaceutical Society of Northern Ireland (Continuing Professional Development) (Amendment) Regulations (Northern Ireland) 2013.

How can I respond to this Consultation?

- 9 Respondents can find the Continuing Professional Development Framework Consultation and all documents relating to the consultation on the Pharmaceutical Society NI website:
<http://www.psni.org.uk/publications/consultations/>
- 10 Respondents will be asked to complete a response template based on the questions outlined in the consultation document. This can then be sent by email to consultations@psni.org.uk. Hard copy responses can be sent to: CPD Framework Consultation, Pharmaceutical Society of Northern Ireland, 73 University Street, Belfast BT7 1HL.
- 11 This 12-week consultation starts on 29 October 2019 and will end at 12 noon on 21 January 2020. Responses received after this date may not be considered.
- 12 For information on responding to this consultation, please contact Mark Neale at consultations@psni.org.uk or telephone 028 9032 6927.

Consultation Questions

- 13 We would welcome any views you wish to submit on the questions below:
- Q1 Does the CPD framework 2020 clearly set out the annual CPD requirements for pharmacists?**
- Q2 Do you agree with the proposed approach of having a focused core framework document with operational matters covered off in supplementary draft guidance documents?**

- Q3** Do you agree with the proposal to amend the selection criteria for CPD portfolios selected for assessment? This would include:
- a percentage, agreed by Council, of all CPD portfolios submitted; and
 - all or a random percentage of all submitted CPD portfolios in the groups of pharmacists identified for focused selection and assessment.
- Q4** The 2020 Framework enables the Registrar to require certain groups of pharmacists joining the Register to make an early in-year CPD portfolio submission, in lieu of a submission at the end of the CPD year. Does this provide a proportionate approach in the management of risk?
- Q5** Do you agree with the proposal to reduce the assessment criteria from 9 to 6, all being essential?
- Q6** Amount of CPD in annual submission:
- a) Do you agree with the proposal to standardise the number of CPD cycles to be submitted to between 4 and 10; and
 - b) that 30 hours of actual CPD learning activity be submitted, thereby removing the current allowance for writing up time?
- Q7** Pass mark:
- a) Do you agree with the proposal to change the overall pass mark to 50% to bring greater consistency with postgraduate qualifications?
 - b) Do you agree that it is reasonable to change the pass mark which needs to be met to 50% in terms of both the number of CPD cycles and the number of CPD hours?
- Q8** Type of CPD - Do you agree with the 2020 Framework requirements detailing that at least 50% of both CPD cycles and hours submitted must relate to scheduled reflective practice?
- Q9** Do you agree that no more than 25% of CPD cycles and hours may be evaluated using simulated practice or application to future practice?

Q10 Does the 2020 Framework provide enough clarity on the number of cycles and hours required for CPD submissions made in the Remediation process and requirements for meeting the standard?

Q11 Are there any aspects of our proposals that could result in equality and diversity implications for groups or individuals based on one or more of the following categories? If yes, please explain what could be done to change this.

- **Age**
- **Gender**
- **Disability**
- **Pregnancy and maternity**
- **Race/Ethnicity**
- **Religion or belief**
- **Political Opinion**
- **People with dependents**
- **Sexual orientation**
- **Marital Status**

Q12 Do you have any other comments about the proposed 2020 CPD Framework?

It is important that you provide reasons for your answers so the Council of the Pharmaceutical Society NI can understand the rationale for your views. A response template for completion is available on the Pharmaceutical Society NI website.

Accessibility of information

- 14 If you have difficulties accessing the documentation or you need us to assist you to respond to this Consultation, please contact us and we will do our best to address the issue.
- 15 If you wish your response to remain confidential, indicate this in your response and the Pharmaceutical Society NI will generally respect this request. However, the information you provide may be subject to disclosure under the Freedom of Information Act 2000.

How will we respond to Consultation feedback?

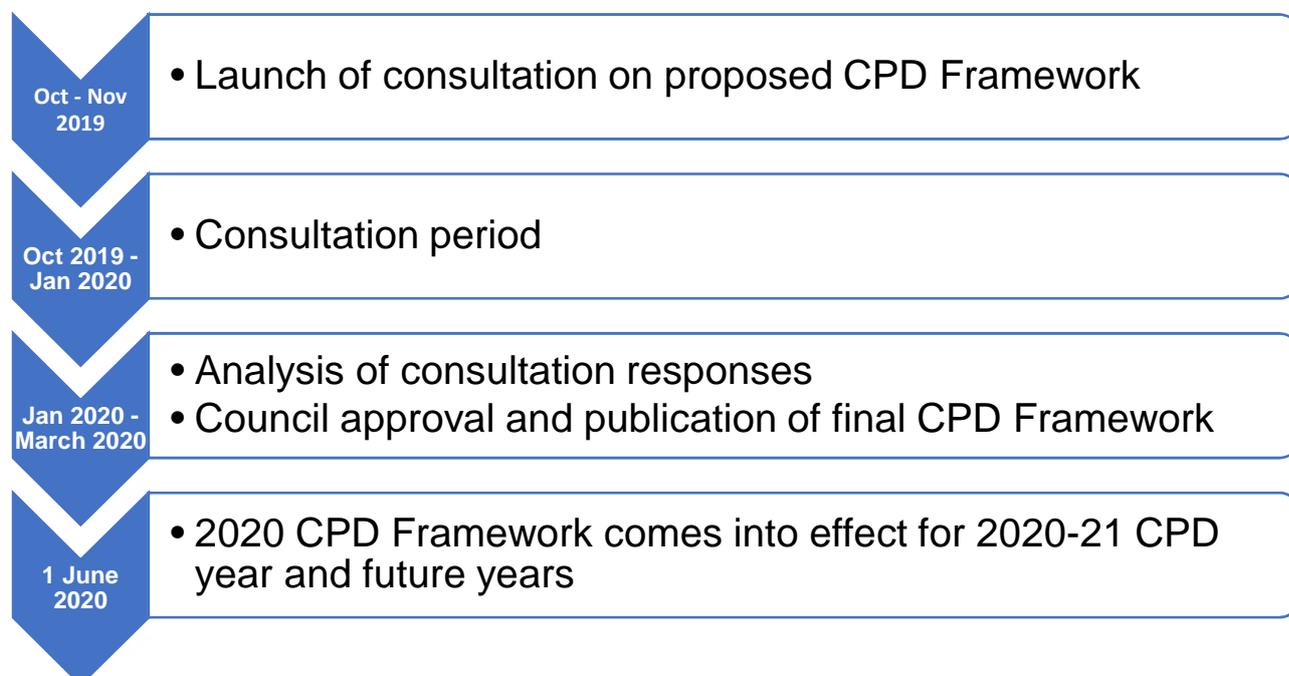
- 16 Once the consultation period ends, all consultation responses will be considered and a report analysing the consultation responses will be produced and published on our website.
- 17 The Council of the Pharmaceutical Society NI will consider all the consultation responses and, based on the feedback received, will decide if and how the Continuing Professional Development Framework might be amended.

- 18 The 2020 Continuing Professional Development Framework will subsequently be approved and published by the Council of the Pharmaceutical Society NI. It is anticipated that it will come into effect on 01 June 2020 for the 2020-21 CPD year.

Proposed 2020 Continuing Professional Development (CPD) Framework

- 19 The current CPD Framework will remain in place for the June 2019 – May 2020 CPD year.
- 20 The requirement for an annual CPD submission based on reflective practice is now well established. This review seeks to ensure the Framework remains fit for purpose and fit for the future including any future role it may play if Continuing Fitness to Practise or Revalidation for pharmacists is taken forward.
- 21 Following consideration of the consultation responses, it is envisaged that the 2020 Framework will be agreed by Council by early 2020.

Figure 1: Timeline for development of proposed CPD Framework



- 22 The first year that CPD submissions will be made under the 2020 Framework will be by 31 May 2021 for the 2020-2021 CPD year.

Key changes in the 2020 CPD Framework

- 23 This consultation document should be read in conjunction with the proposed 2020 Framework and outlines the key changes that are proposed as follows:
- i) a shorter, focused Framework document supported by separate operational guidance;
 - ii) clarification on exemptions and applications for extenuating circumstances;
 - iii) selection criteria of submitted portfolios for assessment;
 - iv) changes to CPD cycles, CPD Hours and pass mark to meet the required CPD standard;
 - v) changes to the amount of CPD that must be evaluated within current scope of practice and amount that can be evaluated in the context of simulation or application in future practice;
 - vi) changes to the balance between scheduled/pre-planned CPD and unscheduled CPD;
 - vii) streamlining of criteria against which assessment takes place;
 - viii) clarification of the requirements for remediation; and
 - ix) changes to requirements for those joining the register after more than 12 months out of pharmacy practice or for those who have left through voluntary removal in a previous CPD year without making a CPD submission.

Figure 2: Key changes between Current and proposed 2020 CPD Frameworks

Current CPD Framework	Proposed 2020 CPD Framework
<ul style="list-style-type: none"> ■ 50 pages including operational and legislative detail ■ Difficult for patients and pharmacists to navigate 	<ul style="list-style-type: none"> ■ 12 pages with supporting operational guidance documents ■ More focused and understandable for patients and pharmacists ■ Clear diagrams on the high-level requirements and essential criteria
<ul style="list-style-type: none"> ■ Automatic entitlement (upon application) to partial exemption for those on Register less than 6 months 	<ul style="list-style-type: none"> ■ No automatic entitlements. All extenuating circumstances applications will be considered by the Registrar on basis of evidence submitted

<ul style="list-style-type: none"> ■ 10% of all portfolios assessed 	<ul style="list-style-type: none"> ■ Percentage of random selected portfolios decided by Council ■ A proportion from identified risk groups including late submitters, pharmacists changing pharmacy sector, those returning to Register after voluntary removal or more than a year out of practice.
<ul style="list-style-type: none"> ■ Re-joiners out of practice over 12 months provide a PDP on return ■ Re-joiners having voluntarily removed themselves from the register in a previous CPD year could re-join without making a CPD submission 	<ul style="list-style-type: none"> ■ Re-joiners may be required to make an early in-year CPD portfolio submission ■ Those who re-join Register having previously been granted voluntary removal during a CPD year may be required to make an early, in-year, CPD submission after re-joining
<ul style="list-style-type: none"> ■ 9 assessment criteria (5 essential, 4 non-essential) 	<ul style="list-style-type: none"> ■ Merged into 6 essential criteria
<ul style="list-style-type: none"> ■ Minimum 30 hrs of CPD including 5 hours write-up time to be submitted ■ Minimum 4 CPD cycles. No upper limit on number of cycles to be submitted 	<ul style="list-style-type: none"> ■ Minimum 30 hours CPD to be submitted. No write-up time is now assigned ■ Between 4 and 10 CPD cycles to be submitted
<ul style="list-style-type: none"> ■ Pass mark of 40% 	<ul style="list-style-type: none"> ■ Pass mark of 50% in line with postgrad qualifications
<ul style="list-style-type: none"> ■ Pass mark only applies to cycles 	<ul style="list-style-type: none"> ■ Pass mark applies to both the number of cycles <u>and</u> the number of hours i.e. 50% of each must be passed
<ul style="list-style-type: none"> ■ In theory, 100% of cycles and hours could be evaluated and closed using simulated practice or application to future practice 	<ul style="list-style-type: none"> ■ 75% of cycles and hours submitted must be evaluated and closed within the context of current work scope and environment ■ Not more than 25% can be evaluated and closed in context of simulated environments or application to future practice
<ul style="list-style-type: none"> ■ In theory, a pharmacist could submit 100% unscheduled CPD cycles and hours ■ Not all criteria applied to unscheduled CPD cycles 	<ul style="list-style-type: none"> ■ At least 50% of CPD cycles and CPD hours must be scheduled learning based on reflective practice ■ All criteria applied to all CPD cycles.

Legislative requirements for CPD Framework

- 24 Article 4A of the Pharmacy (Northern Ireland) Order 1976 requires the Pharmaceutical Society NI to include the following in the CPD Framework:
- the amount and type of CPD that must be undertaken;
 - the information pharmacists must provide about their CPD and the form and manner in which that information is to be provided;
 - when the information is to be provided (including any CPD relating to annotations or specialisms a pharmacist has);
 - the keeping of records about the continuing professional development undertaken by registered persons; and
- 25 The Pharmaceutical Society NI must also ensure that CPD undertaken is relevant to:
- the safe and effective practice of pharmacy; and
 - a learning need relevant to the individual's current scope of the practice of pharmacy including any specialist area of practice of that individual registered person and the environment in which they practise.

Pre-Consultation and future role of CPD

- 26 The development of this 2020 draft CPD Framework has taken into account the pre-consultation engagement undertaken on this matter in 2018 and early engagement on the potential future development of a Continuing Fitness to Practise or Revalidation model for pharmacists in Northern Ireland, which the Council of the Pharmaceutical Society has determined to explore further.
- 27 It is intended that the CPD processes which are adopted following this consultation will form the cornerstone of any future development of Revalidation or Continuing Fitness to Practise for pharmacists in Northern Ireland.

Shorter, focused Framework

- 28 The current CPD Framework is a long document. It includes significant detail on operational matters and processes on how the Pharmaceutical Society NI will operationally manage the small numbers of pharmacists who do not comply with, or do not meet, the requirements of CPD submissions.

- 29 The 2020 CPD Framework is intended to be a focused document. It contains all the elements required by legislation. It provides clarity on what pharmacists must do for their CPD submissions to meet the required standard.
- 30 The 2020 Framework is designed to be more accessible to patients in understanding the form and manner of CPD that pharmacists take part in every year thereby helping to maintain confidence in the profession.
- 31 The 2020 Framework explains the exemptions that are available and how they can be applied for. It also outlines what will happen in the event of non-compliance or not meeting the required standard in assessment of CPD submissions.
- 32 Further detail on more operational matters will be found in supporting draft guidance as identified in Paragraph 88 of the 2020 CPD Framework document.

Questions

- Q1 Does the CPD Framework 2020 clearly set out the annual CPD requirements for pharmacists?**
- Q2 Do you agree with the proposed approach of having a focused core framework document with operational matters covered off in supplementary draft guidance documents?**

Changes and clarifications to the requirements for pharmacists to make a CPD submission and declaration

Clarification on exemptions and applications for extenuating circumstances

- 33 CPD is a legal requirement for pharmacists in Northern Ireland.
- 34 The legislation exempts pharmacists on the European Economic Area Visiting Practitioners list providing the Registrar is satisfied that they are undertaking the relevant CPD in their home state².
- 35 The legislation also provides for the Registrar of the Pharmaceutical Society NI to consider where a pharmacist has a 'reasonable excuse'³ not to fulfil some or all the CPD requirements. As a result, the Pharmaceutical Society NI provides a

² This is subject to any change in legislation that may result as a consequence of the UK leaving the European Union.

³ Article 2 (2) The Council of the Pharmaceutical Society of Northern Ireland (Continuing Professional Development) Regulations (Northern Ireland) 2012

means for pharmacists to make an application for extenuating circumstances where they consider they have a reasonable excuse.

- 36 There is no automatic exemption to CPD requirements based on extenuating circumstances. All of those seeking a full or partial exemption must make an application. Approximately 5% of registered pharmacists make an application each year.
- 37 The current Framework allows a small number of pharmacists to apply for a partial CPD submission based on the date during the year that they joined or re-joined the Register. This arbitrary date is potentially unfair.
- 38 The 2020 CPD Framework removes this anomaly. A pharmacist on the Register for a shorter period will be able to apply to the Registrar for consideration for extenuating circumstances.
- 39 This enables the Registrar to consider each application based on the evidence provided. The Registrar will then decide on whether to grant a full, partial or no exemption.

Selection of submitted portfolios for assessment

- 40 The Pharmaceutical Society NI could assess every CPD portfolio submitted annually. To do this would incur significant costs and would not be proportionate to the patient safety risk. Regulation needs to be proportionate and risk based. Every pharmacist is, however, required, by the 31st May each year, to submit a compliant CPD portfolio and to complete declarations in relation to their CPD. In order to be compliant, the submission must contain some key attributes around hours, cycles and content. If a pharmacist who has unsuccessfully applied for an exemption is subsequently subject to a Notice of Removal for non-compliance with CPD, they can follow the prescribed appeals process to the Statutory Committee of Council.
- 41 The Pharmaceutical Society NI will continue to take both a focused and randomised approach to the selection of portfolios that are assessed each year. All submitting pharmacists should assume that their portfolio has the potential to be assessed.

Random sample of registered pharmacists

- 42 Under the current Framework, the Pharmaceutical Society NI will select 10% of submitted portfolios each year for assessment. The portfolios are selected using a random number generator.
- 43 Under the 2020 Framework, the percentage of random portfolios will be decided each year by the Pharmaceutical Society NI Council and may change from year

to year. The number of randomly selected portfolios is likely to continue to make up the largest proportion of all portfolios assessed in a year.

- 44 It is important to note that the random selection process means that it is possible that the same pharmacist may be chosen for assessment in multiple years.

Focused selection of portfolios

- 45 The Pharmaceutical Society (NI) may choose to focus its selection on specific areas or groups on the Register. This could include, for example, a group of pharmacists with an annotation or where there is evidence of an increased potential risk in the scope of practice.
- 46 Research commissioned⁴ by the Pharmaceutical Society NI prior to the introduction of current CPD Framework highlighted that there was a potentially higher risk from groups including those returning to pharmacy practice after an extended absence and those who were changing pharmacy sectors. The fast pace of change and the need for different approaches and skills in different sectors were among the key elements identified.
- 47 Where new evidence becomes available, the Pharmaceutical Society NI may, and has the authority to, choose to add or remove additional groups of pharmacists or sectors to the list of focused groups for selection of CPD submissions for assessment. At this stage, those groups that will be focused on may include pharmacists:
- making late CPD submissions (if accepted by the Registrar);
 - returning to pharmacy practice after an extended absence or returning to Register following voluntary removal in a previous CPD year where a CPD submission was not made;
 - changing pharmacy sector;
 - that have a previous history of non-compliance with CPD requirements.

Late submissions

- 48 Pharmacists can update the CPD portal any time during the year. This provides a real time opportunity to keep their CPD cycles maintained and up to date. Once the CPD submission portal opens, a pharmacist has up to two months to sort and select the cycles to include in their annual submission. This provides adequate time for all pharmacists to meet the 31 May deadline.
- 49 Legislation requires all pharmacists to meet the submission deadline. The benefits of this for planning and operational purposes include minimising the

⁴ [Assessing Risk Associated with Contemporary Pharmacy Practice in Northern Ireland](#), Denham Phipps, Peter Noyce, Kieran Walshe, Dianne Parker, Darren Ashcroft, University of Manchester, June 2011

impact on costs and, therefore, the annual retention fee. Any delay to the submission of portfolios can also impact on the random selection of portfolios for assessment.

- 50 Therefore, any pharmacist who misses the submission deadline may have their portfolio rejected or automatically assessed. In the past two years, this would have affected less than 0.7% of all submissions (average 15 per year).

Changing pharmacy sector

- 51 The legislation⁵ is specific that CPD must relate to the current scope of practice and environment. Therefore, any pharmacist notifying the Pharmaceutical Society (NI) of a change to their pharmacy sector during a CPD year may have their portfolio selected for assessment.
- 52 There is significant flexibility in the pharmacy workforce to change sectors. Modern healthcare policy and developments are also creating new and wider roles for pharmacists including the significant increase in recent years in the newly developed role of pharmacists in GP practices/Federations across Northern Ireland.
- 53 It is possible for pharmacists to move during their career between industry, community pharmacy, hospital pharmacy or GP practice or to become an Independent Prescriber. Such changes bring new ways of working, systems and practices. These are potential risks and, therefore, the pharmacist needs to ensure they are up to date.

Joining the Register after more than 12 months out of pharmacy practice

- 54 Pharmacy and healthcare are fast-moving health environments with changes to medication, uses and practice occurring all the time.
- 55 The focus of the CPD Framework is on what pharmacists need to undertake to demonstrate reflective practice and to meet the requirements for CPD. This is separate from any requirements that they must meet in terms of their application to join or re-join the Register and any fitness to practise matters.
- 56 Arguably, the longer a pharmacist has been out of practice the greater the risk regarding any loss of up to date knowledge, skills or awareness. It is in the best interests of both the pharmacist and patients that anyone returning to practice undertakes early CPD as part of their return to work, notwithstanding the additional training and induction support that employers should have in place. This is recognised by a range of professional healthcare regulators.

⁵ Article 4A (7) (b) (ii) Pharmacy (Northern Ireland) Order 1976

- 57 In considering the application, the Registrar will review whether other evidence has been provided.
- 58 Under the current Framework, pharmacists returning to the Register following an extended gap in pharmacy practice (more than 12 months) were requested to provide a Personal Development Plan. This does not assess the evaluation and completion of the CPD learning cycle.
- 59 Under the 2020 Framework, pharmacists re-joining the Register after more than 12 months out of pharmacy practice may be asked to make an early, in-year, CPD submission for assessment.
- 60 In each case, the number of cycles and hours may be specified by the Registrar as well as the date for submission.

Joining the Register from another register

- 61 Those joining the Register who have been practising pharmacy in another regulated environment will seek admission through the normal application process and the Certificate of Current Professional Standing and any other evidence provided.
- 62 At this time, it is not planned that practising pharmacists joining the Register with good standing from another recognised regulator will be required to undertake early submissions unless any evidence of increased risk emerges.

Returning to Register following previous voluntary removal

- 63 Applicants seeking to re-join the Register, having previously obtained voluntary removal from the Pharmaceutical Society NI Register during a CPD year, may be required to make a CPD portfolio submission for that CPD year, irrespective of how long they have been off the Register.
- 64 If the pharmacist re-joins the Pharmaceutical Society NI Register during a future CPD year, they may be required by the Registrar to make an early CPD portfolio submission for the CPD year they re-join.
- 65 In considering the application, the Registrar will review whether other evidence of CPD has been provided.
- 66 In each case, the number of cycles and hours may be specified by the Registrar as well as the date for submission.

Portfolios selected for assessment in focus groups

- 67 Pharmaceutical Society NI may select all or a proportion of submitted CPD portfolios in each of the focus groups of pharmacists.
- 68 For all of those selected for assessment in the focus groups, the same requirements will apply. If a submission is deemed, following assessment and verification, not to have met the CPD standard then those pharmacists will move forward to the remedial process.
- 69 Where a pharmacist considers that they have a reasonable excuse for non-submission of an early CPD submission then an application, with supporting evidence, should be made to the Registrar using the extenuating circumstances process.
- 70 If a pharmacist returning to the Register is required to make an early submission for assessment and meets the standard, they will be recognised as meeting their CPD requirement for that CPD year. They will not have to make a further CPD submission in the same CPD year or be selected for assessment again in the same CPD year.
- 71 The numbers affected by this would be small. Fewer than 50 former registrants return to the Pharmaceutical Society NI Register each year.

Questions

- Q3 Do you agree with the proposal to amend the selection criteria for CPD portfolios selected for assessment? This would include:**
- a percentage, agreed by Council, of all CPD portfolios submitted; and
 - all or a random percentage of all submitted CPD portfolios in the groups of pharmacists identified for focused selection and assessment.
- Q4 The 2020 Framework enables the Registrar to require certain groups of pharmacists joining the Register to make an early in-year CPD portfolio submission in lieu of a submission at the end of the CPD year. Does this provide a proportionate approach in the management of risk?**

Streamlining of Assessment Criteria

- 72 The CPD Framework has always had criteria designed as a reflective practice model based on the four stages of the CPD learning cycle (reflection, planning, action and evaluation). In the current CPD Framework, there are nine criteria against which each CPD is written up and subsequently assessed. However, four of the criteria are listed but are non-essential in terms of assessment. It is not considered that this provides sufficient clarity.
- 73 The 2020 Framework has simplified the nine criteria to six (see Figure 3). These six will all be essential criteria which will form the basis of how the pharmacist prepares the recording of each cycle.
- 74 It is considered that the proposed approach will provide greater clarity and consistency for registrants in preparation of CPD cycle submissions and for CPD Assessors in assessing portfolios.

Figure 3: Criteria for assessment of CPD cycles

	Current CPD Framework (Essential criteria in Bold)	Proposed 2020 CPD Framework (Essential criteria in Bold)
Reflection	Did the pharmacist: 1. Identify specific learning need(s)? 2. Describe why they wanted to learn about this?	1. Did the pharmacist identify specific learning needs? 2. Did the pharmacist describe why they wanted to learn about this (the context for the learning activity)?
Planning	Did the pharmacist: 3. Describe the activity/activities that they planned to undertake to meet these need(s)? 4. Indicate when they planned to complete these by?	3. Did the pharmacist describe, in the activity table, the learning activity/activities they completed to meet the learning needs?
Action	Did the pharmacist: 5. Provide a brief description of the learning activity/activities they completed to meet the learning needs? 6. Include a brief summary of what they learnt?	4. Did the pharmacist include a summary of what they had learnt?

Evaluation	<p>Did the pharmacist:</p> <p>7. Indicate if they have met their learning need(s)?</p> <p>8. Indicate how their practice has changed or will change as a result of their learning or how they have applied or will apply their learning?</p> <p>Finally, considering the CPD cycle in its entirety:</p> <p>9. Is it evident that their original learning need(s) have been addressed within the cycle?</p>	<p>5. Did the pharmacist evidence how their practice has changed or will change because of the learning or how they have applied or will apply their learning?</p> <p>6. Is it evident that the learning needs have been addressed within the cycle?</p>
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Question

Q5 Do you agree with the proposal to reduce the assessment criteria from nine to six, all being essential?

Changes for CPD cycles, CPD hours and pass mark to meet the required CPD standard

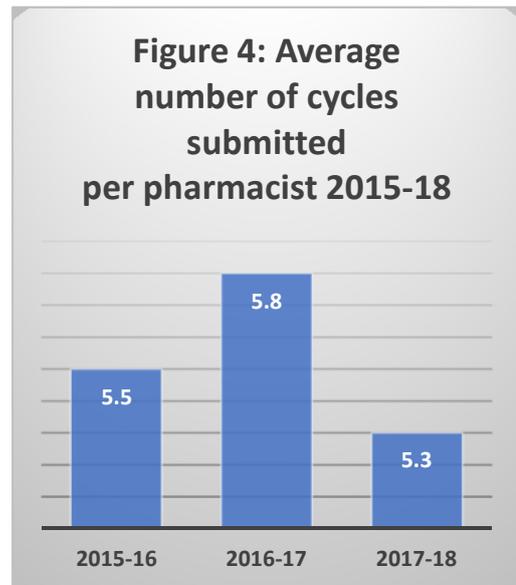
CPD submissions must include between four and ten cycles

- 75 The proposed Framework provides greater clarity and consistency by identifying the maximum number of cycles that pharmacists can submit in their annual CPD submissions.
- 76 The Pharmaceutical Society NI online CPD folder system facilitates a real-time record of all CPD undertaken in a form that enables it to be subsequently used in annual submission. The CPD Framework does not seek to assess every piece of CPD undertaken by pharmacists and recorded in the portal. The CPD submission is meant to provide a representative reflection of the CPD undertaken each year to keep skills, knowledge and practice up to date in line with the standard in the Pharmaceutical Society NI Code.
- 77 The 2020 Framework states that a pharmacist will provide a minimum of four and a maximum of ten learning cycles in a single CPD submission. This does not change the minimum number required but sets an upper limit on the maximum number of cycles that can be submitted.

78 A maximum of ten ensures that each CPD submission can include a blend of learning opportunities, including shorter time learning opportunities and those that require longer periods of reflection, planning, action and evaluation of the learning achieved, as a representative sample chosen by the Registrant.

79 Pharmacists will still be able to record as many cycles as they want to on their CPD folder but will only submit between four and ten cycles amounting to at least 30 hours.

80 This change should have a minimal impact on the making of submissions. The evidence from CPD submissions from 2015-18 show that between five and six cycles on average each year were submitted (see Figure 4).



Submissions must include 30 hours of CPD learning activity

81 The number of hours required for inclusion in a CPD submission remains unchanged. Irrespective of the number of cycles submitted, they must cover not less than 30 hours of CPD activity. A sample of 30 hours (equivalent to four full days) is regarded as a reasonable representative commitment of CPD activity to facilitate assessment.

82 The 2020 Framework does not include an allocation of five hours of writing-up time as a component of the 30 hours of CPD which the current Framework did. This then directs pharmacists to focus on the CPD activity and on their progression through the learning cycle. The stages of reflection, planning, action and evaluation are achieved through the learning activity recorded.

83 It may be that a pharmacist provides more than four cycles which amount to significantly more than 30 hours of CPD activity. If their portfolio is subsequently selected for assessment, the Pharmaceutical Society NI may ask the pharmacist to specify the cycles amounting to approximately 30 hours that they want to be considered for assessment purposes.

Changing of the pass mark and its application to both CPD cycles and number of CPD hours

- 84 The proposed CPD Framework changes the pass mark for successful completion of a CPD portfolio from 40% to 50% in line with the pass mark expected in postgraduate training programmes/courses.
- 85 It is suggested that it is reasonable for patients and the public to expect pharmacists to have successfully completed the learning cycle for at least half of the CPD submitted. The new pass mark reflects this.
- 86 The impact of this change would be minimal. In practice, the pass rate has always effectively been 50% for any pharmacist submitting the required four cycles, or anyone submitting six, seven, eight or nine cycles as 40% cannot be measured in whole cycles.

It is considered that it is reasonable and consistent that the pass mark applies to both the number of cycles and the number of hours to ensure that variation in cycle duration does not distort the result

- 87 Under the 2020 CPD Framework, a pharmacist must pass at least 50% of the submitted cycles. The cycles passed must also account for at least 50% of the total CPD hours submitted. This ensures that there is a qualitative and quantitative assessment to both cycles and hours.

Questions

Q6 Amount of CPD in annual submission:

- a) **Do you agree with the proposal to standardise the number of CPD cycles to be submitted to between four and ten; and**
- b) **that 30 hours of actual CPD learning activity be submitted, thereby removing the current allowance for writing-up time?**

Q7 Pass mark:

- a) **Do you agree with the proposal to change the overall pass mark to 50% to bring greater consistency with postgraduate qualifications?**
- b) **Do you agree that it is reasonable to change the pass mark to 50% in terms of both the number of CPD cycles and the number of CPD hours?**

Clarification of requirements for inclusion in CPD submission

Clarification of the amount of CPD that must be evaluated within current scope of practice and what can be evaluated in context of application to simulation or future practice.

- 88 As highlighted previously, the legislation⁶ states that CPD activity must relate to a pharmacist's current scope of practice and environment. At the heart of CPD is reflective practice where a pharmacist reflects on their own experiences in working to identify their learning and development needs.
- 89 It is recognised that in a fast-changing healthcare environment, it is not unreasonable for a pharmacist to evaluate and close some elements of CPD through simulated practice or recording how learning would be applied to future practice or a future role in pharmacy if it is not possible to close the learning in a CPD year. The 2020 Framework proposes to limit the amount so closed.
- 90 The proposed Framework proposes that at least 75% of all cycles and hours submitted must be evaluated and closed in the context of the pharmacist's current scope of practice and environment. This enables a pharmacist to submit up to 25% of their portfolio of cycles and hours evaluated and closed using simulated practice or by demonstrating the application of the learning to the potential future practice in their role, a new annotation or a role in a different pharmacy sector they plan to work in.

Annotations and specialisms including pre-registration tutors

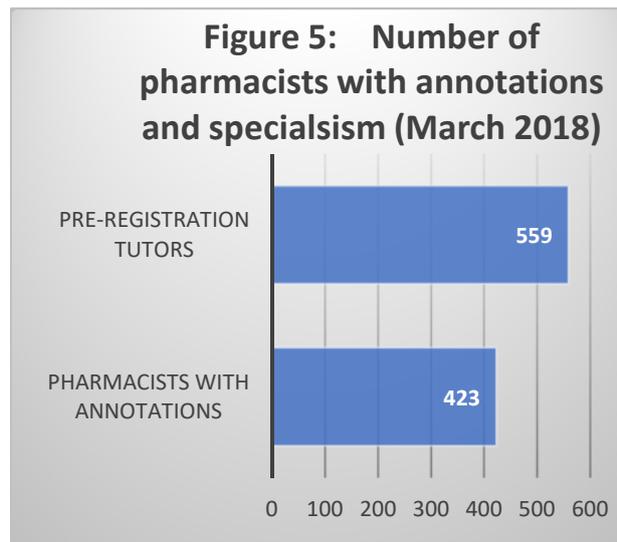
- 91 The Pharmaceutical Society NI Code⁷ is clear that pharmacists should only practise when they are competent and fit to do so and that they undertake CPD relevant to their scope of practice and keep their knowledge and skills up to date to the scope of practice.
- 92 Pharmacists have the right to have an annotation added to their practice for specific areas of work that they have been accredited for. For example, pharmacists who have completed an accredited Independent Prescriber course and meet the criteria for registration as an Independent Prescriber can have the annotation IP to note that they are an Independent Prescriber. Other pharmacists are pre-registration tutors, supervising the work of pre-registration pharmacists.

⁶ Article 4A (7) (b) (ii) Pharmacy (Northern Ireland) Order 1976

⁷ Standard 5.1, Maintain and Develop professional knowledge, skills and competence - Pharmaceutical Society NI Code

93 As Figure 5 shows, in March 2018, out of 2596 pharmacists on the register, 559 were pre- registration tutors. 423 had an annotation.

94 It is, therefore, important that those with annotations and pre-registration tutors demonstrate that they are undertaking CPD relevant to those areas of their practice. Pharmacists with annotations and/or those acting as pre-registration tutors should consider including CPD relevant to each to ensure the full scope of their practice and environment are covered.



Scheduled v Unscheduled

95 The legislation⁸ states that CPD activity should relate to an identified learning need relevant to a pharmacist's scope of practice, environment, annotations or specialism.

96 In the main, learning should be scheduled and planned in line with the principles of reflective practice for professionals. Learning needs will be primarily identified from reflection on the pharmacist's work, practice and environment including changes within the wider healthcare and pharmaceutical environment. This active and pre-planned learning is regarded as Scheduled CPD.

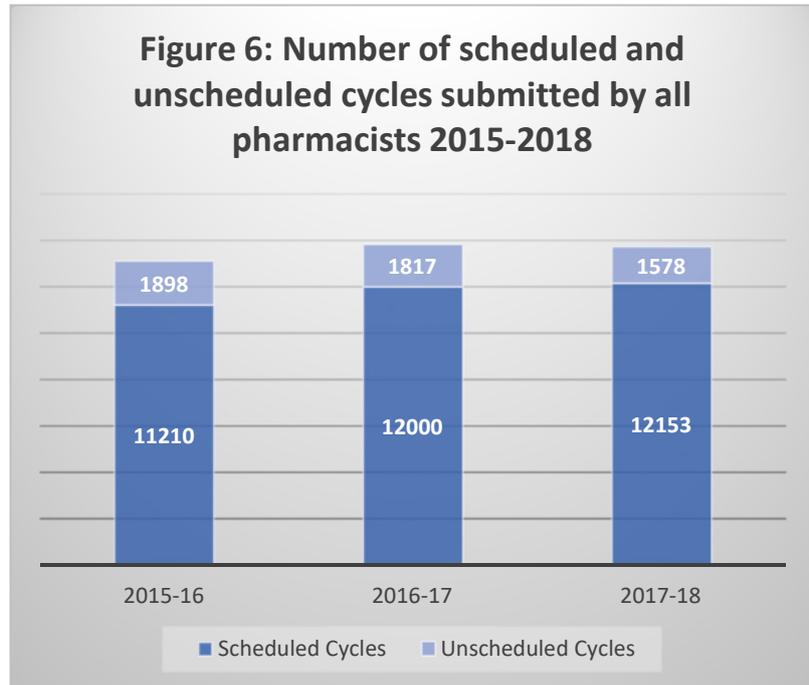
97 Unscheduled CPD is reactive practice where a pharmacist responds in the short-term to circumstances or issues that arise. There is limited or no pre-planning. For example, if a patient asks a community pharmacist a question about a specific drug or treatment, then the pharmacist will follow a reactive course of action to seek the answer and will learn from that. Under the current Framework, unscheduled learning is only assessed against two essential criteria compared with a scheduled cycle which is considered against five essential and four non-essential criteria. The proposal is that unscheduled cycles are measured against the six new essential criteria.

⁸ Article 4A (7) (b) (ii) of Pharmacy (Northern Ireland) Order 1976

98 To ensure that CPD delivers reflective practice, there must be a predominance of scheduled learning.

99 The 2020 Framework proposes that at least 50% of CPD cycles and hours must relate to scheduled learning activities.

100 As Figure 6 shows, nine out of every ten (89%) cycles submitted in 2018 related to scheduled



learning activities. Therefore, this change will have minimal impact on pharmacists compared to practice under the current Framework.

Questions

Q8 Type of CPD - Do you agree with the 2020 Framework requirements detailing that at least 50% of both CPD cycles and hours submitted must relate to scheduled reflective practice?

101 When evaluating a CPD cycle, it is recognised that the opportunity to do so in practice may not present itself in a current CPD year. Therefore, using simulated practice or demonstrating the application to future practice may be permitted in limited circumstances. It is, therefore, proposed that a proportion of the CPD evidence submitted, not greater than 25%, can be closed by simulated or application to future practice.

Q9 Do you agree that no more than 25% of CPD cycles and hours may be evaluated using simulated practice or application to future practice?

Clarification of requirements for Remediation

102 Remediation is the process that pharmacists enter if their CPD has not met the standard after assessment. In order to be deemed not met, a portfolio will have been assessed by at least two separate assessors.

103 The 2020 Framework specifies remediation as normally an additional 3 new cycles that have taken place in the subsequent CPD year. The three cycles must cover between 15-20 hours of CPD activity.

- 104 To meet the standard, pharmacists must pass at least two of the cycles submitted as is the case in the current Framework. Under the proposed Framework, the cycles meeting the standard need to cover at least 50% of the hours submitted to maintain consistency with the core CPD submission process.
- 105 Those who are unsuccessful at the first Reassessment (Reassessment 1) under the remedial process will be required to submit a further 3 CPD cycles which will follow the process outlined above. This is known as Re-assessment 2.
- 106 In 2017-18, while 28 CPD submissions were deemed not to have met the CPD standard, only 2 did not meet the required standard after Re-assessment 1 under the remedial process. Only 1 subsequently failed to meet the standard following Reassessment 2. This demonstrates that the process is focused on remediation to support pharmacists in meeting the CPD standard.

Questions

- Q10 Does the 2020 Framework provide enough clarity on the number of cycles and hours required for CPD submissions made in the Remediation process and requirements for meeting the standard?**

Equality Screening

- 107 The Pharmaceutical Society NI has carried out an equality screening on the policy changes contained in the proposed CPD Framework. This showed that there were no differential impacts on most of the equality groups and that any potential impacts were addressed by the mitigating factors that continue to be built into the policy.

General Questions

- Q11 Are any aspects of our proposals that could result in equality and diversity implications for groups or individuals based on one or more of the following categories? If yes, please explain what could be done to change this.**

- | | |
|----------------------------------|---------------------------------|
| • Age | • Religion or belief |
| • Gender | • Political Opinion |
| • Disability | • People with dependents |
| • Pregnancy and maternity | • Sexual orientation |
| • Race/Ethnicity | • Marital Status |

- Q12 Do you have any other comments about the proposed 2020 CPD Framework?**