

Evaluation of 2016-18 CET cycle

October 2019

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1. Executive summary

1.1 Introduction

The General Optical Council (GOC) is the regulator for the optical professions in the UK. Our mission is to protect and promote the health and safety of the public. We currently register around 30,000 optometrists, dispensing opticians, student opticians and optical businesses.

As a healthcare regulator, we are required to operate a scheme of continuing professional development (CPD) and a scheme of continuing fitness to practise (sometimes referred to as 'revalidation') proportionate to the professions we regulate. We operate an enhanced CPD scheme to cover both requirements, which we call our Continuing Education and Training (CET) scheme. It is a statutory obligation for our optometrists and dispensing opticians to complete their CET requirements in order to remain on the register.

CPD has been mandatory since 2005. In response to a Government white paper¹ in 2007, ensuring registrants' continuing fitness to practise (revalidation), we carried out research into risks associated with optical practice in 2010. As a proportionate response to ensuring revalidation, the scheme was enhanced in 2012, with changes coming into effect for the 2013-15 CET cycle. The 2016-18 CET cycle ended in December 2018 and we are now carrying out an evaluation of the cycle, comparing it to the previous cycle where possible to do so.

Registrants' CET requirements vary depending on length of time on the register and registrant group. More information about individual registrants' requirements can be found on our website (<https://www.optical.org/en/Education/CET/cet-requirements-for-registrants.cfm>) and in our guidance booklet *CET guide for registrants 2019-21*.

A mixed method approach was taken to this evaluation, with a quantitative (statistical) analysis of our data on the CET cycle and a qualitative survey of a subset of registrants who would be able to inform us about key areas of interest.

The key terms used throughout this report can be found in section 2.4.

¹ *Trust, Assurance and Safety: The Regulation of Health Professionals in the 21st Century* (2007), London: The Stationery Office

1.2 Analysis - key findings

Completion of CET during the cycle

- Registrants were found to spread completion of their CET requirements across the three-year cycle, with 56% completing their CET requirements prior to the final three months.
- Registrants with a requirement to complete **peer review** were most likely to meet this first, with the average registrant achieving it in the first 14 months of the cycle. All other requirements were achieved towards the end of the cycle.
- Registrants with specialty registration (contact lens opticians and therapeutic prescribers) were more likely to meet their **interactive points** requirements earlier in the cycle than those without (optometrists and dispensing opticians).
- 96-98% of registrants achieved the regulatory expectation of **six CET points each year of the CET cycle**.
- 60% of all registrants completed a minimum of **12 CET points for each year of the cycle**, ranging from 53% of dispensing opticians to 85% of therapeutic prescribers.
- 81% of registrants **completed more than their minimum requirement for general points**, ranging from 69% of dispensing opticians to 90% of therapeutic prescribers.
- 72% of registrants with the requirement to complete a peer review **completed more than their minimum peer review requirement**, with optometrists being the most likely to do so.
- Even though they do not have a peer review requirement, **83% of dispensing opticians completed a peer review**, with 57% having completed more than one.
- We contacted 8,210 **registrants who had not completed their CET requirements by 31 October 2018**, inviting them to participate in a survey. Of the 218 registrants who responded to the survey we found that:
 - 48% found that the most difficult CET requirement to complete was interactive points;
 - the most common reasons for not having completed their CET requirements earlier in the cycle were that registrants responding to the survey had booked events for the final two months of the cycle that would enable them to meet their CET requirements (50 respondents) and that personal circumstances had prevented them from completing their CET earlier (48 respondents);

- some registrants responding to the survey referred in free-text comments to difficulties in finding CET events locally, the unfairness of dispensing opticians not receiving financial help to fund CET activities despite having the same requirements as optometrists, and/or having a lack of time to complete CET activities due to personal commitments;
- 33% of registrants responding to the survey had completed their CET requirements by 31 October 2018 but had not logged in to MyCET to verify and accept the points, with the majority indicating that it was onerous to accept CET points;
- 67% of registrants responding to the survey had intended to complete their requirements sooner with the majority indicating that they had not due to unexpected or unplanned circumstances or a lack of time earlier in the cycle. In the free-text comments, some registrants specifically mentioned difficulties in finding CET close to home or in obtaining interactive points and confusion over peer review requirements;
- 35% of respondents to the survey would like better resources from the GOC to help them meet their CET requirements and 49% wanted more time and/or better resources from their employer. In the free-text comments, some respondents indicated that they wanted better resources or interactive CET for locums and help with / understanding how to deal with personal circumstances that affected completion of CET. They also wanted more interactive points available online and an easier sign-off process for CET points.
- 98% of registrants accept and verify activities on MyCET within a reasonable time after completion of the CET activity.
- 73% of registrants continued to review and accept any additional CET points that they completed once they had met their minimum CET requirements.
- Our communications with registrants who had not yet completed their CET requirements in the last six months of the cycle appeared to increase MyCET activity. MyCET activity tended to peak in March and November/December each year.
- Our survey of 8,210 registrants who had not met their CET requirements as at 31 October 2018 found that of the 218 respondents, 89% recalled receiving our email reminders, with 83% finding them clear and easy to understand. 58% of survey respondents said they logged in to MyCET after receiving these reminders to check their outstanding requirements.
- Those registrants working in independents were more likely to complete their CET requirements sooner than those who worked in multiples, with a significantly lower rate for those who worked as locums.

- **Registrants based outside the UK ('non-UK' registrants):**

- we looked at the months in which registrants met their full CET requirements for comparison purposes between UK and non-UK registrants (the first group of registrants finished their CET requirements in September 2018 so there are 28 months for comparison across the cycle). In 16 out of the 28 months, a higher proportion of UK registrants completed their CET than non-UK registrants;
- our survey of non-UK registrants (to which 20 registrants responded) showed the following self-reporting:
 - 60% of respondents said that the most difficult element to complete was interactive points (with a significant proportion of registrants completing most of these in the UK);
 - the next most difficult element to complete was peer review, with a slight majority completing it in the country in which they were based followed by completing it in the UK – 65% of respondents to the survey said that they did not know that they could arrange a registrant-led peer review with registrants who were not registered with the GOC;
 - 40% of respondents completed about half of their CET online, with 30% completing most of it online;
 - 20% of respondents had applied for activities they attended outside the UK to be recognised as CET, with three of the four respondents finding the process to be difficult. Just over half of respondents felt it would be helpful if there were a directory of non-UK CET that had been approved;
 - survey respondents indicated a range of reasons for maintaining registration with the GOC while being based outside the UK, the main ones being that they liked the status of being registered and that they occasionally returned to practise in the UK; and
 - just over half of respondents were required to complete CPD for another regulatory/professional body outside the UK, with half of those finding it difficult to use the same set of CET/CPD to meet their requirements for both bodies.

Compliance with CET requirements at end of CET cycle

- **1.9% of registrants (435) did not complete their CET requirements** as at 31 December 2018 (where they not already told us that they intended to retire/withdraw from the register) – 46% of these submitted a dispute and/or an application for consideration of exceptional circumstances (six registrants submitted both).

- 112 registrants **disputed** that their MyCET record was not accurate for a variety of reasons and that they had in fact met their CET requirements. While 75% of these disputes were accepted, only 63% of those who submitted a dispute remained on the register as they had still not met their CET requirements despite the inaccuracy.
- Of the 84 disputes accepted, 24% were due to the registrant not having accepted their CET points on MyCET and 65% were due to CET providers not uploading confirmation of completion of CET to MyCET. In 8% of cases both reasons applied (as it related to more than one CET activity), meaning that there were 62 cases in total where the provider had not uploaded confirmation of completion of CET in time.
- We received 100 applications for consideration of **exceptional circumstances** from registrants who had not met their CET requirements.
- 40% of exceptional circumstances applications were accepted and the registrant remained on the register.
- 12 registrants registered an **appeal** against our decision to remove them from the register for not meeting their CET requirements (six related to our decision to refuse their application for exceptional circumstances – one of these was overturned by the Registrar prior to a hearing due to additional information – and five had disputed their CET records). To date, four appeals have been heard by the Registration Appeals Committee (two upheld and two dismissed).
- There has been a very small increase in the number of appeals since the last cycle (from nine to 12).
- In April 2019, we removed 392 registrants from the register for not meeting their CET requirements (this number includes those who told us they wished to retire/withdraw from the register).

Reflective practice

- In the 2016-18 CET cycle registrants were required to complete a personal development plan before they could access their personal CET records and therefore 100% of registrants completed it. Prior to this in the 2013-15 CET cycle when this was not a requirement, 41% of registrants had completed it.
- 80% of registrants created learning goals in addition to the set learning goal that they were required to complete.
- 60% of registrants used post-CET reflection statements for CET where they were not required to do so, with 130,205 post-CET reflection statements created that did not relate to peer review.
- 6,400 registrants made more than five post-CET reflection statements (these were for both peer review and other CET activities).

- 4% of registrants used MyCET to record non-CET activities, which totalled 1,502.

Effectiveness of CET approval process

- 88% of applications for approval of CET activities from CET providers were approved and 12% were rejected (in the 2013-15 CET cycle, 90% were approved and 10% were rejected).
- In the final year of the 2016-18 cycle, there were 30% more requests for further information from CET providers to support their approval application than in the first year of the cycle, possibly due to our interventions with CET approvers.
- The total number of appeals against an approval decision remained level between the last two cycles (2%), with 227 in 2013-15 and 223 in 2016-18.
- Appeals for rejected CET applications decreased from 100 in the last year of the 2013-2015 cycle to 50 in the last year of the 2016-18 cycle, possibly due to our interventions with approvers and providers.
- 74% of appeals for rejected CET approval applications were successful, with the CET subsequently being approved (often after requesting further information).
- There was a 10% reduction in the total number of CET approval applications between the 2013-15 and 2016-18 CET cycles, suggesting that our decision to extend the approval period from one year to the full cycle made a difference.
- We responded to 91% of CET approval applications within our time targets (our responses for standard and fast-track approvals were significantly higher than for non-UK CPD and registrant-led peer review approvals).

Provider performance

- 79% of CET providers had uploaded confirmation of completion of CET events on MyCET within the ten working day deadline.
- 322 CET providers provided a total of 16,195 CET activities, with registrant feedback scores averaging at 91%, ranging between 78-100%.
- 69% of CET activities were delivered once, with the remaining 31% being delivered twice or more.
- 37 CET activities took place in the last week of the cycle where providers did not upload confirmation of completion of CET in time for the registrant to verify and accept their CET points by the end of the cycle, which may have prevented some registrants meeting their CET requirements.

Availability and accessibility of CET

- 16,195 CET activities were available to registrants (13,257 events requiring physical attendance, 2,688 distance-learning activities and 250 activities classified as neither events or distance-learning activities) across the range of competencies.
- CET events were spread over 900 locations and 11 regions, with a significantly higher number of events being available in London and Birmingham.
- The top three types of CET events available were lectures, discussion workshops and peer discussion groups.
- There were 772 registrant-led peer reviews attended by 4,565 registrants.
- 50% more CET points were awarded for events requiring physical attendance than distance-learning activities.
- The largest ten CET providers provide 68% of all CET, with the largest three providing 37%.

1.3 Summary of conclusions

Completion of CET during the cycle

- Most registrants are carrying out more than their minimum CET requirements.
- The CET scheme has been effective in meeting its aims of reducing professional isolation, with significant numbers of registrants carrying out more than their minimum peer review requirements and the vast majority meeting their interactive CET requirements.
- The CET scheme has had some success in ensuring that registrants keep up to date in all of the knowledge and skills relevant to their scope of practice, with all registrants being required to cover a range of competencies and complete a personal development plan.
- The CET scheme has been effective in ensuring that registrants maintain their knowledge and skills throughout the duration of the cycle, with the vast majority of registrants completing a minimum of six points per year and 60% completing at least 12 points per year.
- Of those registrants who had not completed their CET requirements by 31 October 2018, many had intended to do so sooner but had not been able to due to personal circumstances. Respondents to our survey tended to find interactive points the most difficult to complete and around 25% found it onerous to accept CET points.
- A small proportion (4-5%) of registrants would have met their requirements sooner in the last year of the cycle if they had logged in to MyCET to verify

completion of CET and accept their points, meaning that we would not have had to send out 1,100 of the letters that we were required to send to registrants who had not met their CET requirements as at 31 October 2018.

- Most registrants continue to verify and accept CET points even after meeting their minimum requirements, supporting the finding that a large proportion of registrants are meeting more than their minimum CET requirements.
- Our communications towards the end of the CET cycle to encourage completion of CET appeared to increase MyCET activity and were found by most respondents to our survey to be clear and easy to understand. MyCET activity tended to peak in March and November/December each year so we will need to consider the implications for resourcing.
- Registrants working in independents were more likely to meet their CET requirements sooner than those who worked in multiples, and significantly more likely than those who were locums. Some registrants completing our survey suggested that better CET resources or more interactive CET for locums would be helpful.
- UK registrants were more likely to complete their requirements sooner than non-UK registrants, but the difference was not as marked as we had anticipated.

Compliance with CET requirements at end of CET cycle

- A very small proportion of registrants (1.9% of the register, similar to the last cycle) did not meet their CET requirements as at 31 December 2018 (not including those who had already told us they wished to retire/withdraw from the register), with 46% of those registrants submitting a dispute and/or an application for consideration of exceptional circumstances.
- 63% of the disputes and 40% of the exceptional circumstances applications were accepted, leading to the registrant remaining on the register. We will consider if the changes we made to MyCET in 2019 have made it less onerous for registrants to verify and accept CET points and if there is anything that can be done to ensure that providers upload confirmation of completion of CET before the end of the cycle if they are holding CET activities late in the cycle.
- The number of appeals increased from nine in the 2013-15 cycle to 12 in the 2016-18 cycle, but we are not unduly concerned about the increase due to the small figures. We will continue to learn from the outcome of the appeals.

Reflective practice

- Registrants are using the reflective practice tools on MyCET even where they are not required to do so, with 80% of registrants creating additional learning goals and 60% using reflection statements for activities other than peer review.
- A very small proportion of registrants (4%) are using MyCET to record non-CET activities.

Effectiveness of CET approval process

- The number of CET approval applications has decreased by 10% since the last cycle, which may be due to the decision to approve CET for the full cycle in the 2016-18 CET cycle rather than on a one-year basis as previously in the 2013-15 CET cycle.
- Approvers are much more likely to ask for further information before rejecting a CET approval application than they were at the end of the 2013-15 CET cycle and this may be as a result of the annual training events where approvers were encouraged to engage more with CET providers.
- The total percentage of appeals for rejected CET approval applications has remained stable across the 2013-15 and 2016-18 CET cycles at 2%.
- 91% of CET approval applications are completed within our targets and we will need to consider if we can improve this further.

Provider performance

- Providers are performing well, with 79% of the 322 providers uploading confirmation of completion of CET within the deadline following CET events.
- Feedback scores for providers is consistently high, with an average of 91% across all providers, ranging between 78-100%.

Availability and accessibility of CET

- Over 16,000 CET activities were available to registrants during the cycle, spread across the competencies they are required to complete.
- CET events were spread across a large number of locations and regions.
- Over 4,500 registrants attended registrant-led peer reviews.
- One and a half times more CET points are awarded for events requiring physical attendance than distance-learning activities.
- The CET system is reliant on a very small number of providers to deliver the majority of CET, which could cause difficulties in the availability of CET if one of these providers were to cease operating.

1.4 Summary of recommendations

Completion of CET during the cycle

- 1: Work with CET providers to encourage more local and online interactive CET.
- 2: Review if the changes made to MyCET in early 2019 to make it easier to use (including the process for verifying and accepting CET) have been successful – consider whether a ‘mobile app’ can be developed.
- 3: Work with CET providers to produce CET resources for locums.

- 4: When considering future CET policy, take into account that dispensing opticians do not receive the same funding for CET as optometrists.
- 5: Confirm requirements for peer review and ensure the way that we explain them is clear (so that registrants do not confuse them with discussion workshops).
- 6: Consider a fuller communications strategy across the full three years of the 2019-21 CET cycle (including encouraging registrants to regularly verify and accept their points), as well as continuing similar communications in the final six months to remind registrants to complete their CET requirements.
- 7: Discuss with employers why registrants working in multiples are likely to complete their CET requirements less quickly than those working in independents and whether any further support for those registrants is required (could also explore this using our registrant survey).
- 8: Review the process for recognising activities outside the UK as CET to ensure accessibility and that it does not create a barrier to meeting requirements.

Compliance with CET requirements at end of CET cycle

- 9: Explore with providers that hold CET activities late in the cycle how they can ensure that they upload confirmation of completion of CET on MyCET in time for registrants to verify and accept their CET points by the end of the cycle.
- 10: In early 2020, as part of additional CET evaluation work, consider how many registrants restore after being removed from the register at the end of the cycle and how long it takes them to restore to the register.

Reflective practice

- 11: Continue to review our reflective practice tools as part of our project to review CET.

Effectiveness of CET approval process

- 12: Continue to validate CET approval applications for the full cycle.
- 13: Continue to deliver training to approvers to ensure that information is requested prior to rejection of a CET approval application and to improve consistency of decisions.
- 14: Consider how we can further improve our response rates to CET approval applications (particularly non-UK CPD and registrant-led peer reviews) within our time targets for approvals.

Provider performance

- 15: Continue to work with providers to encourage timely uploading of confirmation of completion of CET on MyCET.

- 16: Further examine the data in relation to provider performance in uploading confirmation of completion of CET in a timely manner for distance-learning activities.

Availability and accessibility of CET

- 17: Consider questions on the availability and accessibility of CET in our registrant survey.
- 18: Consider monitoring whether the proportion of CET points awarded to physical events or distance-learning activities changes over time as new technology develops.

Overall

- 19: Consider further analysis of the registrant data based on registrant profile such as age, sex and ethnicity where these are available in order to inform future CET policy.

2. Introduction

2.1 Background and purpose of the CET scheme

The GOC is the regulator for the optical professions in the UK. Our mission is to protect and promote the health and safety of the public. We currently register around 30,000 optometrists, dispensing opticians, student opticians and optical businesses.

As a healthcare regulator, we are required to operate a scheme of continuing professional development (CPD) and a scheme of continuing fitness to practise (sometimes referred to as 'revalidation') proportionate to the professions we regulate. We operate an enhanced CPD scheme to cover both requirements, which we call our Continuing Education and Training (CET) scheme. It is a statutory obligation for our optometrists and dispensing opticians to complete their CET requirements in order to remain on the register.

We have operated a mandatory CPD scheme, since 2005 with fully qualified optometrists and dispensing opticians expected to meet 36 points over a three-year cycle. CET is essential for eye care practitioners to maintain the up to date skills and knowledge needed to practise safely and effectively throughout their career.

The Government white paper *Trust, Assurance and Safety*² published in 2007 stated that '*Regulated professions will need to put in place arrangements for revalidation of their professional registration, by periodically demonstrating their continued fitness to practise*'.

In response we carried out research in 2010 into the risks associated with optical practice. Key risks identified were a) professionally isolated practitioners, b) registrants undertaking CET in areas of personal interest or based on availability/preferred location or learning methods such as distance learning, or c) registrants undertaking CET in a short space of time within the three-year cycle e.g. the full points gained in the first few months or last few months of the cycle.

In 2012, we used this research to review our existing CET scheme in order to 'enhance' it to for the purposes of revalidation. Enhanced CET was introduced in the 2013-15 CET cycle as a proportionate response to the risks identified and to provide the assurance sought by patients and the public to ensure our registrants' continued fitness to practise. It now included:

- a peer review requirement for optometrists and contact lens opticians;
- an interactive points requirement;
- a regulatory expectation to obtain a minimum of six points each year;

² *Trust, Assurance and Safety: The Regulation of Health Professionals in the 21st Century* (2007), London: The Stationery Office

- a requirement to carry out CET across core competencies dependent on registrant type, including additional competencies for specialists;
- a change in classification of the number of points between general CET points and specialist CET points;
- a greater range of recognised learning methods; and
- introduction of voluntary reflective practice tools.

Registrants' CET requirements vary depending on length of time on the register and registrant group. More information about individual registrants' requirements can be found on our website (<https://www.optical.org/en/Education/CET/cet-requirements-for-registrants.cfm>) and in our guidance booklet *CET guide for registrants 2019-21*.

The 2016-18 CET cycle ended in December 2018 and we are now carrying out an evaluation of the cycle, comparing it to the previous cycle where possible to do so.

2.2 Purpose of this report

The purpose of this evaluation report is to provide the GOC with information about the outcomes of the end of the 2016-18 CET cycle as follows:

- the effectiveness of the scheme in achieving its aims of:
 - reducing professional isolation,
 - ensuring registrants keep up to date in all of the knowledge and skills relevant to their scope of practice,
 - ensuring registrants maintain their knowledge and skills throughout the duration of the cycle;
- identify trends in registrant behaviour and compare with the 2013-15 CET cycle following changes that were made including:
 - the new requirement to complete a scope of practice questionnaire and a learning objective to improve their understanding of the standards of practice and how it relates to CPD; and
 - changing the professional conduct competency to a standards of practice competency; and
- identifying any future developments required.

We will share this report with our registrants, key stakeholders and the wider optical sector. We will use it to document lessons learnt from the 2016-18 CET cycle and will consider these as part of our 'Review of CET' programme to inform future development.

2.3 Methodology

We have interpreted the data that is held on our MyCET online administrative platform. This is the platform used by registrants to manage and record their CET. It

is also used by CET providers to request approval for their CET activities. The approvals are viewed by CET approvers and are assessed for their suitability against a set of criteria as set out in our document, *CET scheme: Principles and requirements v4*, available on our website

<https://www.optical.org/en/Education/CET/information-for-existing-providers.cfm>.

Once CET has been approved, CET providers can deliver the activity as many times as they wish within the approval period (usually the remainder of the current cycle) and registrants can enrol directly with the provider.

Once a CET activity has been completed by a registrant, a provider uploads the last name and registration number of the registrant onto the MyCET system. The MyCET system automatically checks that the name and registration number match and that the registrant is in the correct target group for the CET and has not completed the CET already. The system then adds the CET to the registrant's statement with a pending status (referred to as a 'pending' point or an 'outstanding' point in this report). The registrant is then required to log into MyCET to confirm that they attended and completed the CET and are entitled to the point. In some cases, they are also able to categorise whether they wish to accept the point against their 'general' or 'specialty' requirements. Once the registrant has made this validation (by 'accepting' the point on to their statement and rating the quality of the CET through a feedback score for the provider) the system then updates their progress against all the relevant CET requirements.

At the end of the 2016-18 CET cycle there were 22,822 registrants on the register that would have been expected to complete CET to remain on the register. This is broken down as follows by registrant group:

Registrant group	Total number on register	Percentage of total register
Optometrists	15,085	66%
Dispensing opticians	5,713	25%
Contact lens opticians	1,252	6%
Therapeutic prescribers	772	3%
Total	22,822	100%

In most cases, this report provides a breakdown for the four registrant groups. Where this is the case, no registrant is double-counted i.e. if figures are given for all four registrants groups, therapeutic prescribers are not included within the figures for optometrists and contact lens opticians are not included within the figures for dispensing opticians.

The base number in the figures throughout this report will be different depending on the area we are analysing. For example, when we are looking at overall points

requirements, not all registrants will have a requirement of 36 points for us to compare against – this might be because they joined part-way through the three-year cycle or because they had a different points requirement due to their specialty registration.

This report contains tables and charts referred to as figures. In some instances, the responses may not add up to 100%. There are several reasons why this might happen:

- individual percentages are rounded to the nearest whole number so the total may come to 99% or 101%;
- a response of between 0% and 1% will be shown as 0%;
- the question may have allowed each respondent to give more than one answer; and/or
- only the most common responses may be shown in the table or chart.

2.4 Terminology used in the report

Some of the terms used throughout this report can be found below:

- CET activities – any type of activity approved for CET purposes including CET events or distance-learning activities.
- CET approval application – an application for approval of a CET activity submitted by either a provider or a registrant through MyCET.
- CET events – CET activities requiring physical attendance.
- Contact lens optician – a dispensing optician with a specialty qualification in contact lenses.
- Dispensing optician – a person who fits and supplies spectacles or low vision aids.
- Dispute – at the end of the CET cycle, registrants are given the opportunity to dispute the accuracy of their MyCET records.
- Distance-learning activities – CET activities that do not require physical attendance.
- Exceptional circumstances – if registrants are unable to meet their CET requirements due to circumstances that are over and above the course of everyday experience which have resulted in them being unable to practise, they are given the opportunity to submit an application for consideration.
- General points – CET points relating to a registrant's main registration i.e. optometrists or dispensing opticians.
- Interactive CET – CET involving either physical attendance (such as lectures, workshops or peer review events) or distance-learning which includes an interactive element.

- MyCET – the administrative record IT platform used by registrants to manage and record their CET, by CET providers to submit approval applications, by CET approvers to review approvals and by the GOC to monitor compliance.
- Non-CET activities/events – activities or events related to CPD that do not meet the criteria, or have not been approved, for CET purposes.
- Optometrist – a person who tests your sight and can diagnose eye conditions. They can also fit and supply spectacles, low vision aids or contact lenses.
- Peer review – a CET activity to help a registrant to share their own experiences and expertise with other registrants and learn from their colleagues. This could either be led by a registrant or a CET provider.
- Post-CET reflection statement – a statement that registrants can complete on MyCET after they have completed a CET activity (required for peer review).
- Specialty points – CET points relating to a registrant’s specialty registration i.e. contact lens optician or therapeutic prescriber.
- Therapeutic prescriber – an optometrist with a specialty qualification which covers additional supply, supplementary prescribing and/or independent prescribing.

2.5 Report preparation and acknowledgements

This report has been prepared by the GOC using data collected through its MyCET administrative platform and qualitative survey data.

3. Analysis

3.1 Completion of CET during the cycle

3.1.1 When do registrants complete their overall CET requirements throughout the cycle?

Overall CET requirements

The chart in figure 1 below shows when registrants completed their overall CET requirements across the three-year cycle. A significant majority of registrants completed their requirements in the last year of the cycle, with 56% of registrants completing it prior to the last three months.

Figure 1: Number of registrants achieving their overall CET requirements each month of the 2016-18 cycle

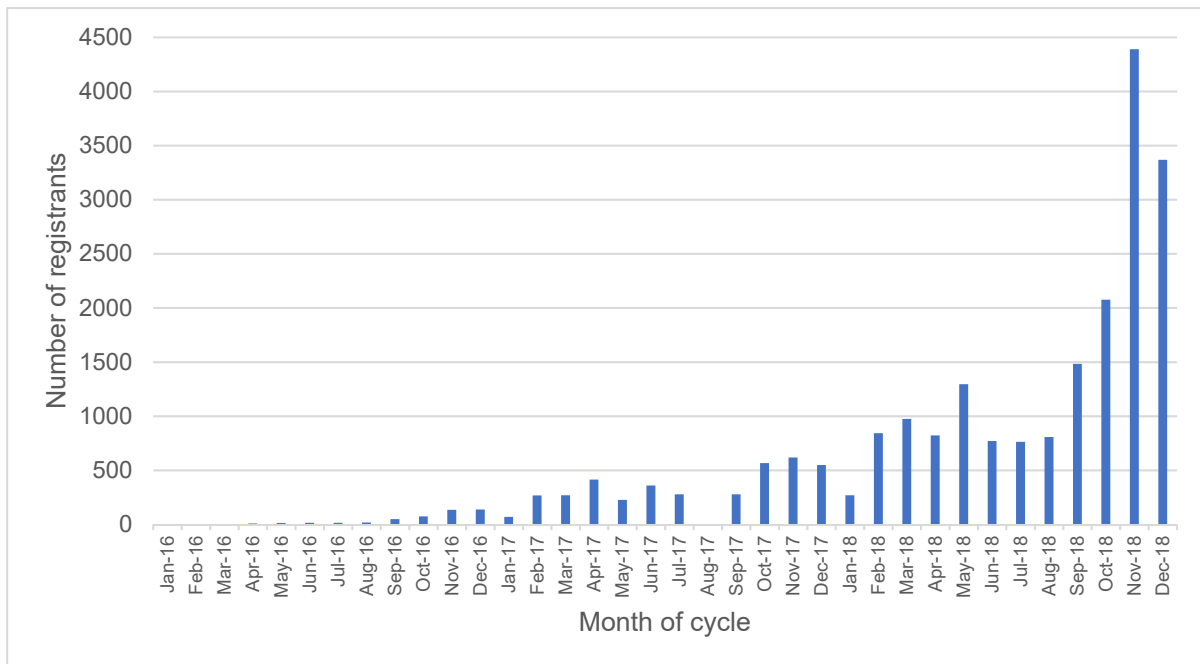
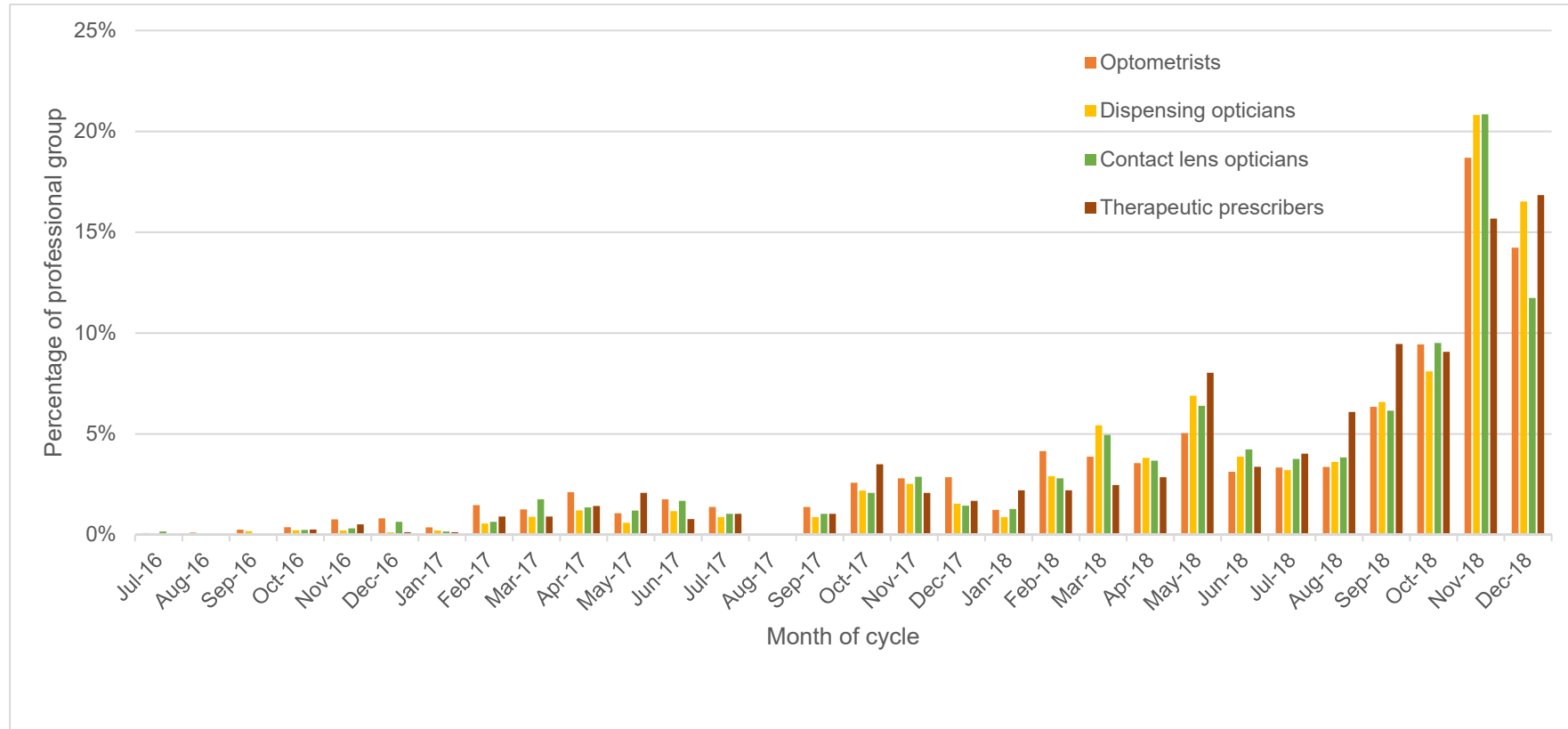


Figure 2 in the annex contains a chart with the percentage of registrants achieving their overall CET requirements broken down by registrant group.

Figure 2: Percentage of registrants achieving their overall CET requirements July 2016 to December 2018 by registrant group



We looked at what percentage of registrants had completed their CET requirements at six monthly intervals across the cycle. The data in figure 3 below shows that registrants tend to spread the completion of their CET across the full 36 months of the cycle and that overall, dispensing opticians were less likely to have achieved their CET requirements at each point in the cycle compared to the other registrant groups.

There is no evidence that registrants rush to complete their CET requirements in the first six months of a new cycle.

Figure 3: Percentage of registrant group completing CET requirements by month of cycle

Month of cycle	Optometrists	Dispensing opticians	Contact lens opticians	Therapeutic prescribers
6	0.3%	0.1%	0.1%	0.4%
12	2.7%	0.9%	1.6%	1.8%
18	11.1%	5.9%	8.5%	9.9%
24	22.0%	13.9%	16.9%	21.7%
30	43.7%	38.6%	41.3%	41.8%
36	98.0%	96.1%	96.2%	99.0%

Which CET requirements were met first?

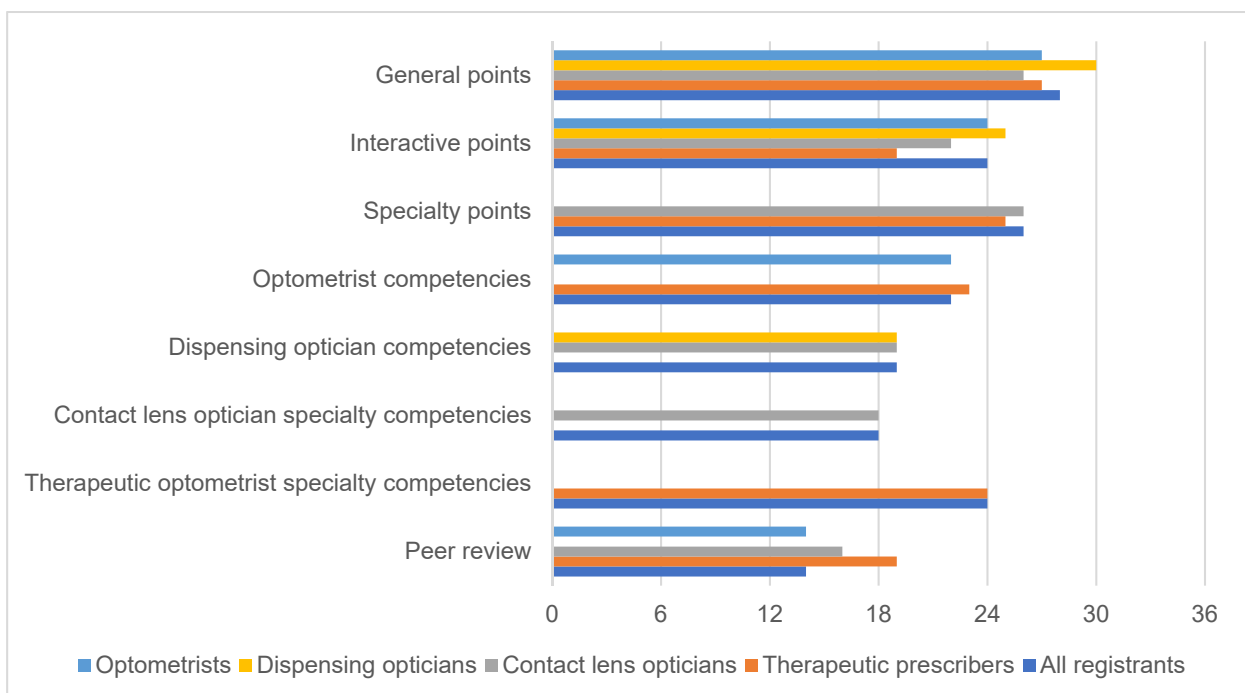
We looked at the average number of months in which it took registrants to meet a particular CET requirement (e.g. general points, interactive points, specialty points, competencies, peer review). Figures 4 and 5 below show that the requirement most likely to be met first is peer review, with the average registrant having achieved this during the first 14 months of the cycle. Perhaps this is not surprising given that it only requires one event, whereas the other CET requirements (general points, interactive points and competencies) would normally require more than one piece of CET to meet the requirements.

For most registrant groups, after peer review the next requirements to be met were competencies, followed by interactive points, then general points. Those with specialty registration (contact lens opticians and therapeutic prescribers) were more likely to meet their interactive points requirements earlier in the cycle than those without (optometrists and dispensing opticians). The average registrant completed all their CET requirements in 30 months and there was no significant variation between registrant groups.

Figure 4: Average mean time in months to finish different CET requirements by registrant group

Requirement	Optometrists	Dispensing opticians	Contact lens opticians	Therapeutic prescribers	All registrants
General points	27	30	26	27	28
Interactive points	24	25	22	19	24
Specialty points	N/A	N/A	26	25	26
Optometrist competencies	22	N/A	N/A	23	22
Dispensing optician competencies	N/A	19	19	N/A	19
Contact lens optician specialty competencies	N/A	N/A	18	N/A	18
Therapeutic optometrist specialty competencies	N/A	N/A	N/A	24	24
Peer review	14	N/A	16	19	14

Figure 5: Graph showing average mean time in months to finish different CET requirements by registrant group



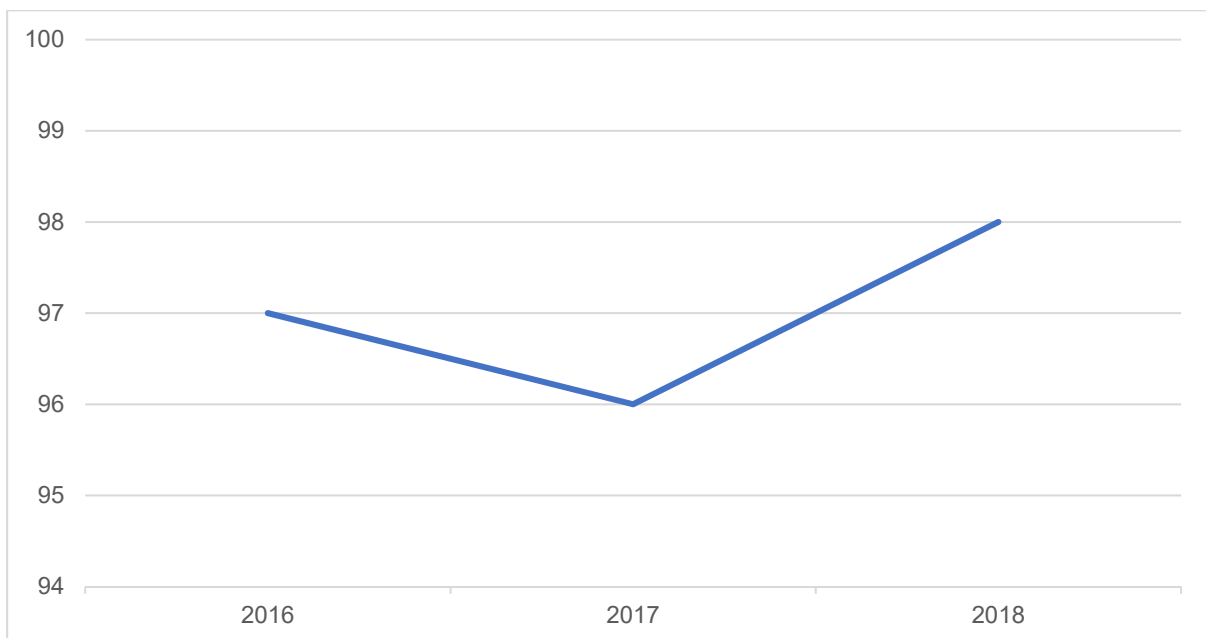
3.1.2 How many registrants completed a minimum of six points annually?

As a way of ensuring that registrants regularly complete CET, we expect registrants to complete a minimum of six points each year. Figures 6 and 7 show that between 96% and 98% of registrants met this requirement each year of the 2016-18 CET cycle.

Figure 6: Number and percentage of registrants completing a minimum of six points by year

Year	Percentage of registrants	Number of registrants
2016	97%	20,937
2017	96%	21,359
2018	98%	22,383

Figure 7: Percentage of registrants completing a minimum of six points by year



3.1.3 How many registrants completed at least 12 points annually?

We also looked at the number and percentage of registrants who completed at least 12 points for each year of the cycle. We chose this figure because while it is not an expectation, most registrants have a requirement to complete 36 points across the three-year cycle (unless they joined part way through the cycle or they have additional specialty requirements), so this is another way to see if registrants spread their CET evenly across the three-year period i.e. one point per month, which is 12 points per year.

We have used the data for registrants who were on the register at the end of the cycle and who were also on the register for each year of the cycle for this analysis. Figures 8 and 9 show that 60% of registrants completed a minimum of 12 points

each year. Figures 10 and 11 show that therapeutic prescribers (85%) were significantly more likely to obtain 12 points, followed by contact lens opticians (67%), optometrists (61%) and dispensing opticians (53%).

Figure 8: Number and percentage of registrants completing a minimum of 12 points by year

Year	Percentage of registrants	Number of registrants
2016	60%	13,697
2017	59%	13,407
2018	62%	14,105
Average across 2016-18	60%	N/A

Figure 9: Average percentage of registrants completing a minimum of 12 points or less across 2016-18 CET cycle

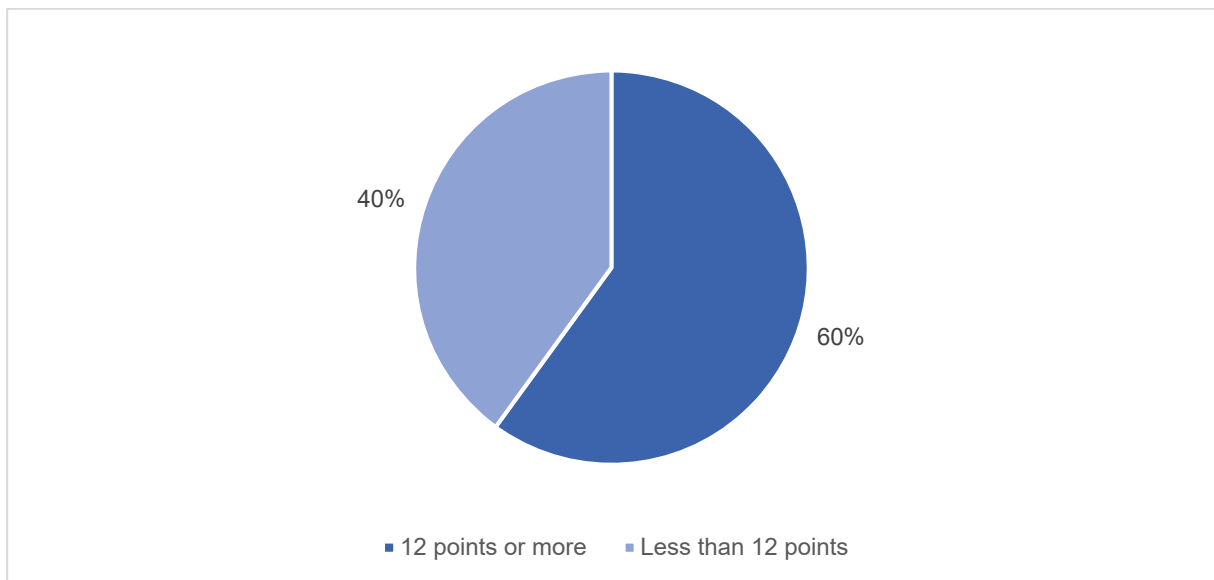
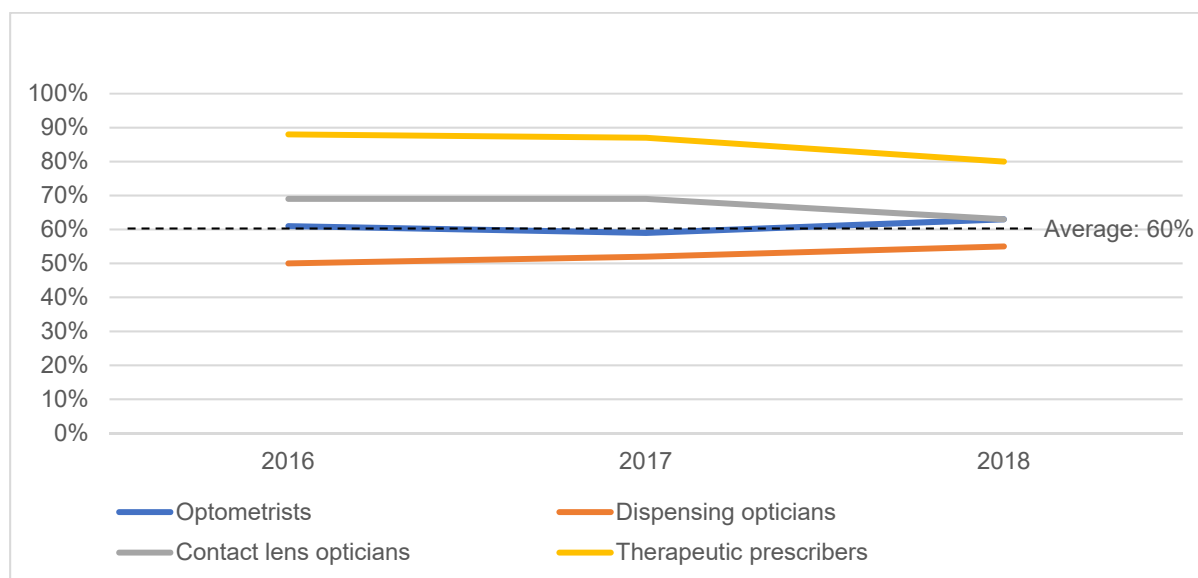


Figure 10: Number and percentage of registrants completing a minimum of 12 points by year and registrant group

Registrant group	2016	2017	2018	Average
Optometrists	61% (9,234)	59% (8,886)	63% (9,564)	61% (9,228)
Dispensing opticians	50% (2,913)	52% (2,988)	55% (3,142)	53% (3,014)
Contact lens opticians	69% (869)	69% (865)	63% (784)	67% (839)
Therapeutic prescribers	88% (681)	87% (668)	80% (615)	85% (655)

Figure 11: Percentage of registrants completing a minimum of 12 points by year and registrant group



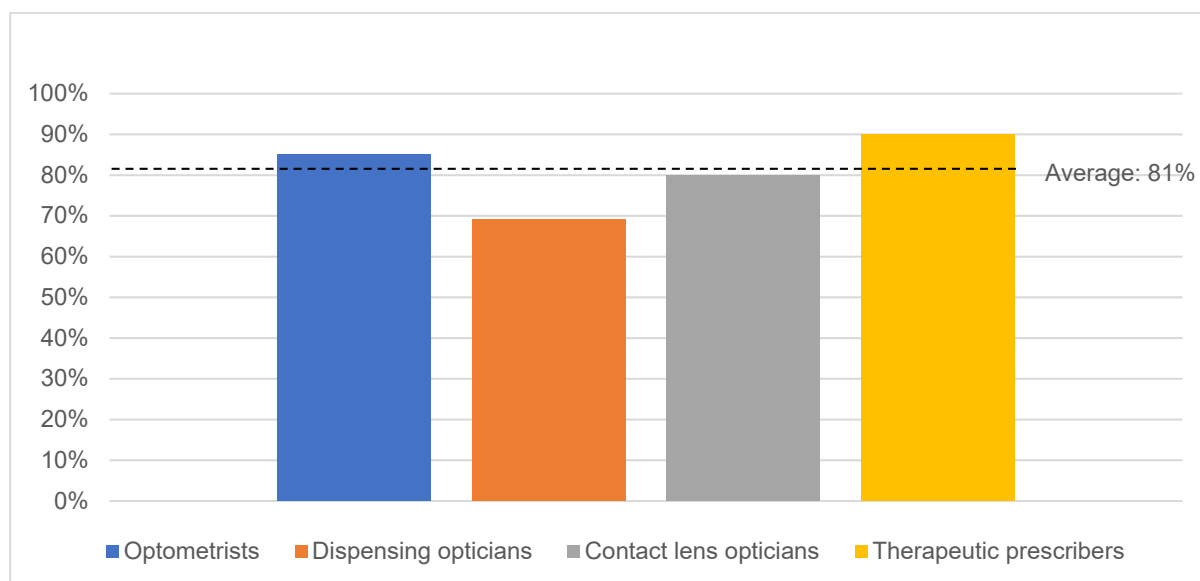
3.1.4 How many registrants completed more than the minimum number of required points over the cycle?

We looked at whether registrants had completed more than the minimum number of points required over the cycle (NB this included all registrants regardless of their points requirement). Figures 12 and 13 show that 81% of registrants completed more than the minimum points requirement, with therapeutic prescribers being the most likely registrant group to do so at 90% and dispensing opticians being the least likely at 69%. Of those registrants that are completing more than the minimum number of points, 80% are achieving in the range of 36-60 points and 20% in the range of 61-541 points.

Figure 12: Number and percentage of registrants completing more than the minimum CET points requirement by registrant group

Registrant group	Percentage of registrants	Number of registrants
Optometrists	85%	12,872
Dispensing opticians	69%	3,963
Contact lens opticians	80%	1,002
Therapeutic prescribers	90%	697
Average of all registrants	81%	18,534

Figure 13: Percentage of registrants completing more than the minimum CET points requirement by registrant group



3.1.5 How many registrants completed more than the minimum peer review?

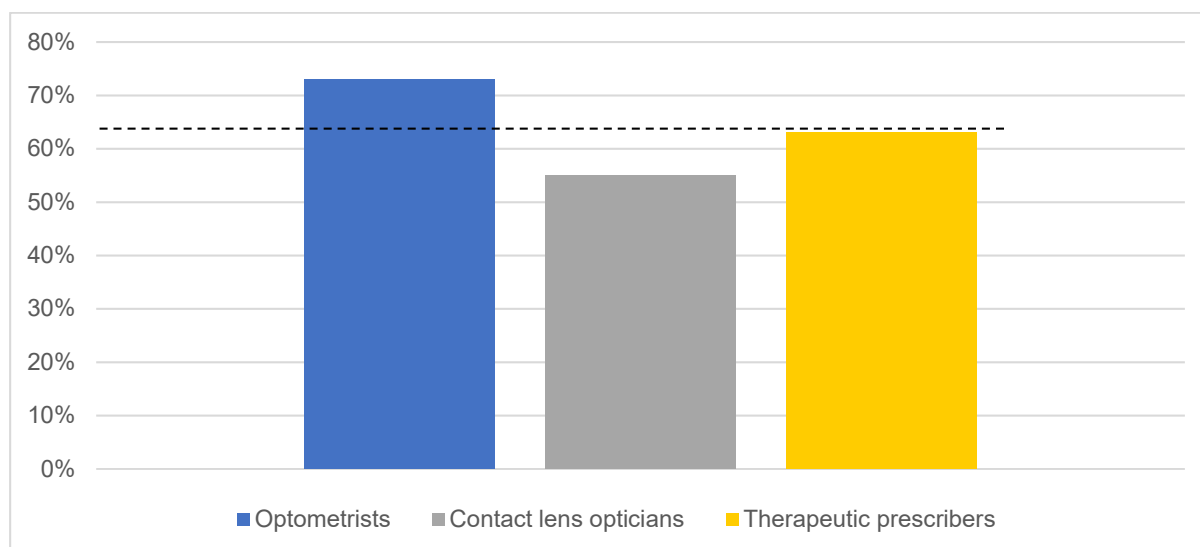
Of those registrants that were required to complete peer review (i.e. optometrists, contact lens opticians and therapeutic optometrists), figures 14 and 15 show that 72% completed more than the minimum requirement.

Figure 14: Number and percentage of registrants completing more than one peer review by registrant group

Registrant group	Percentage of registrants completing more than one peer review	Number of registrants completing more than one peer review	Number of registrants with peer review requirement ³
Optometrists	73%	10,528	14,347
Contact lens opticians	55%	657	1,199
Therapeutic prescribers	63%	484	772
Average of all registrants with peer review requirement	72%	11,669	16,318

³ Not all optometrists, contact lens opticians and therapeutic providers will have a peer review requirement e.g. if they joined in the last year of the cycle this requirement is waived.

Figure 15: Percentage of registrants (with peer review requirement) completing more than one peer review by registrant group



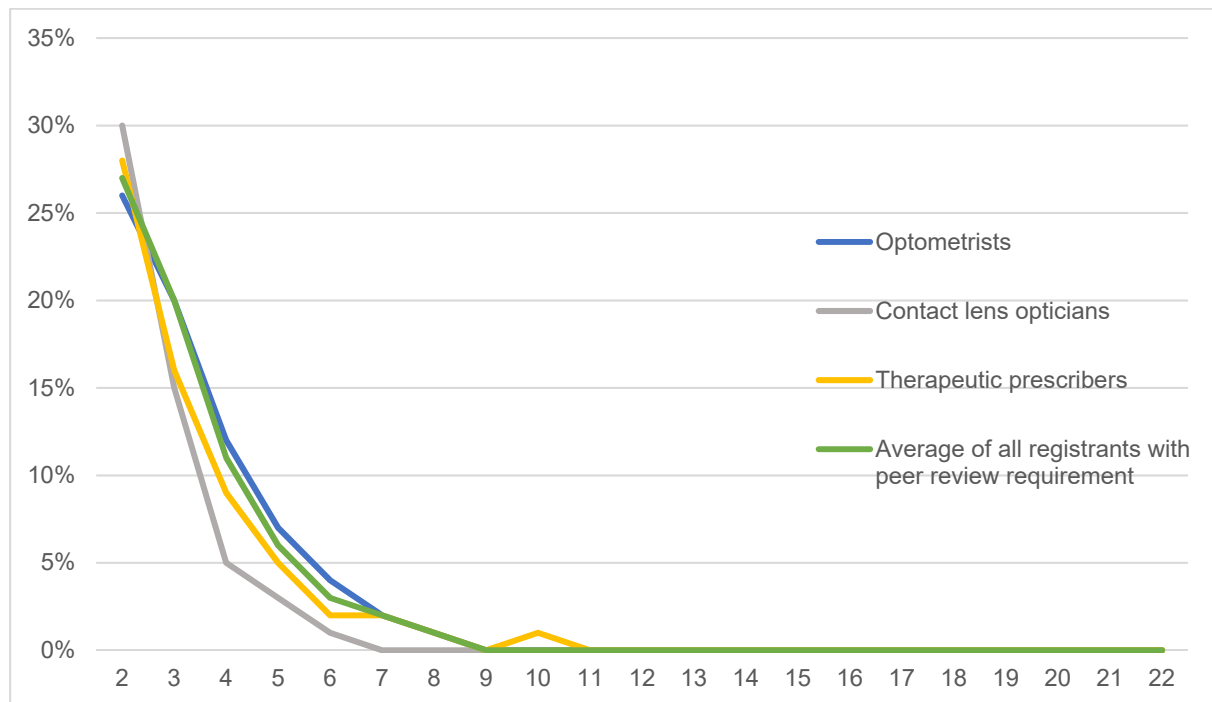
Figures 16 and 17 give more detail about the number of peer reviews broken down by registrant group, with the highest number being 22 peer reviews completed by an optometrist.

Figure 16: Percentage and number of registrants with a peer review requirement completing more than one peer review by registrant group and number of peer reviews

Peer reviews	Optometrists (14,347)	Contact lens opticians (1,199)	Therapeutic prescribers (772)	Average ⁴ (16,318)
2	26% (3,787)	30% (364)	28% (213)	27% (4,364)
3	20% (2,891)	15% (182)	16% (120)	20% (3,193)
4	12% (1,670)	5% (65)	9% (67)	11% (1,802)
5	7% (984)	3% (30)	5% (39)	6% (1,053)
6	4% (522)	1% (8)	2% (17)	3% (547)
7	2% (287)	<1% (2)	2% (15)	2% (304)
8	1% (163)	<1% (2)	1% (5)	1% (170)
9	<1% (103)	<1% (1)	-	<1% (104)
10	<1% (45)	<1% (2)	1% (4)	<1% (51)
11	<1% (31)	<1% (1)	-	<1% (32)
12	<1% (21)	-	<1% (1)	<1% (22)
13	<1% (10)	-	<1% (2)	<1% (12)
14	<1% (6)	-	-	<1% (6)
15	<1% (3)	-	-	<1% (3)
16	<1% (3)	-	<1% (1)	<1% (4)
18	<1% (1)	-	-	<1% (1)
22	<1% (1)	-	-	<1% (1)

⁴ Average of all registrants with a peer review requirement.

Figure 17: Percentage of registrants completing more than one peer review by registrant group and number of peer reviews



3.1.6 How many dispensing opticians completed peer review?

Unlike other registrant groups, dispensing opticians do not have a statutory requirement to complete a peer review, but can still undertake this type of activity as part of their overall CET if they choose to. We found that of the 5,713 dispensing opticians on the register at the end of the cycle, 83% (4,713) had completed a peer review (see figures 18 and 19), with 57% of them having completed more than one (see figures 19 and 20). The highest number of peer reviews completed by a dispensing optician was 14.

Figure 18: Percentage of dispensing opticians completing peer review

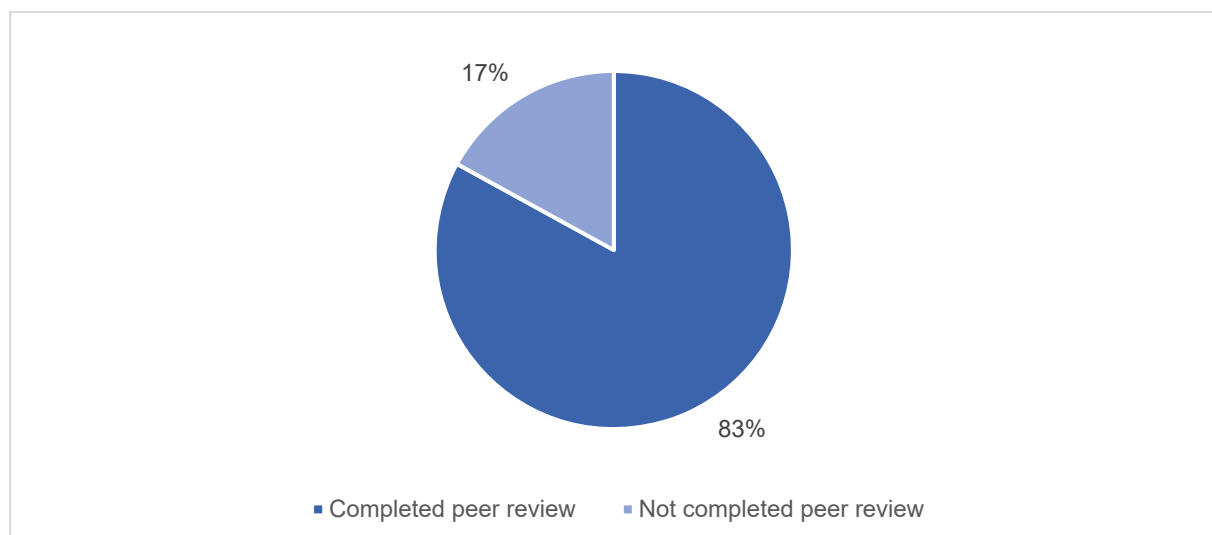
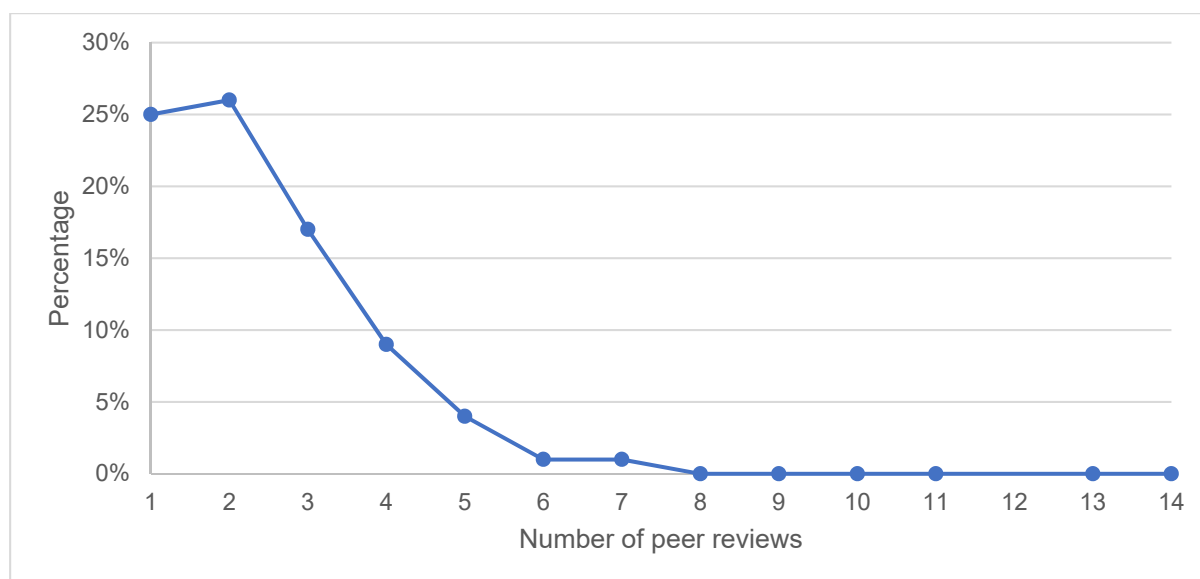


Figure 19: Number and percentage of dispensing opticians completing peer review

Number of peer reviews	Percentage of dispensing opticians	Number of dispensing opticians
1	25%	1,439
2	26%	1,477
3	17%	944
4	9%	501
5	4%	207
6	1%	85
7	1%	32
8	0%	18
9	0%	4
10	0%	1
11	0%	3
13	0%	1
14	0%	1
Total	83%	4,713

Figure 20: Percentage of dispensing opticians completing one or more peer reviews



3.1.7 Why do some registrants complete their CET requirements in the last few months of the cycle?

We are required by our legislation to write to registrants who have not met their overall CET requirements two months prior to the end of the current CET cycle. As at 31 October 2018 there were 8,210 who had not yet met their overall CET requirements. As part of this evaluation, we contacted these registrants in May 2019 asking them to complete a short survey to help us to understand why they still had outstanding requirements in the last two months of the cycle to understand whether

this was planned, whether there were any barriers or issues causing this and whether there was any further support registrants could be given to help them to plan their CET across the cycle. We received 218 responses to the survey (a response rate of 2.6%). Given the low response rate and low numbers overall, care should be taken about how representative these results are, but they will provide a helpful insight into the experience of those registrants.

Results of survey

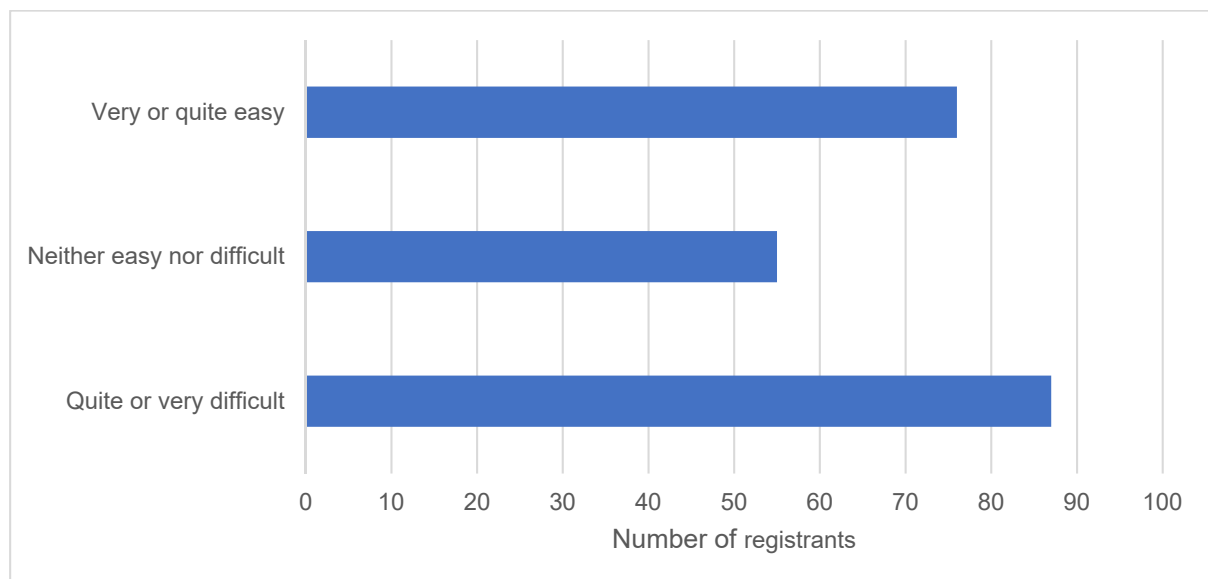
Of the 218 respondents to the survey, figure 21 shows how many registrants in each registrant group responded.

Figure 21: Number of registrants responding to the survey

Registrant group	Percentage	Number
Optometrists	62%	135
Dispensing opticians	31%	68
Contact lens opticians	6%	13
Therapeutic prescribers	1%	2
Total	100%	218

Of those that responded, 92% said that they had completed their CET requirements by the end of the cycle. We asked respondents how easy they had found it to complete their CET requirements. Figure 22 shows that 35% of respondents found it very or quite easy to complete their requirements, 25% found it neither easy nor difficult, and 40% found it very or quite difficult.

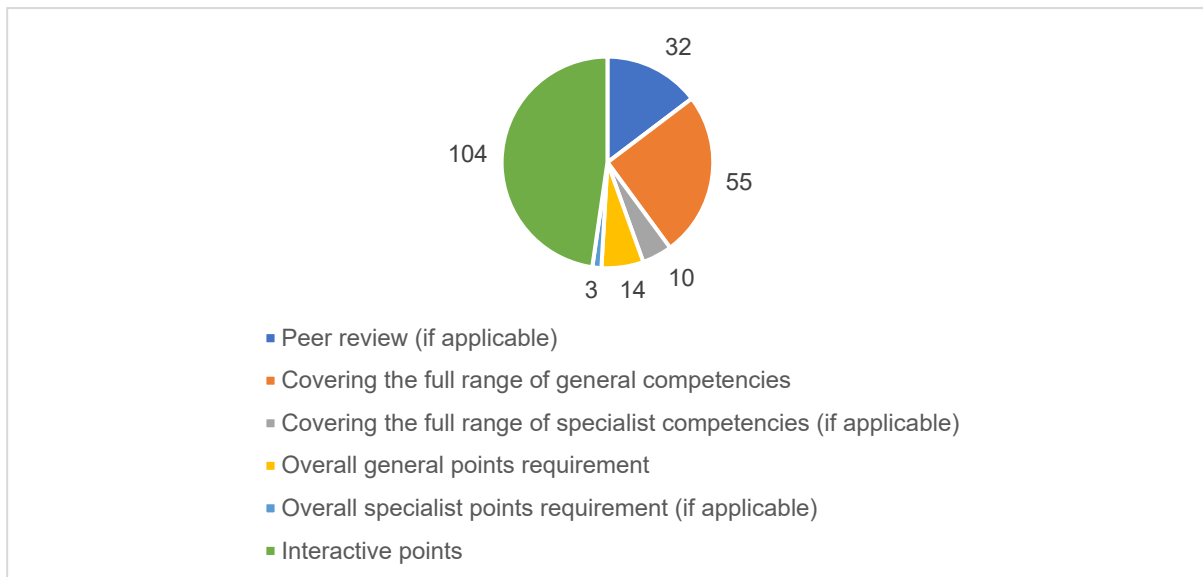
Figure 22: How easy did you find it to complete your CET requirements? Base size: 218



We asked registrants which category of CET they found the most difficult to complete. By far the most difficult was found to be interactive points (48% of

respondents), followed by covering the full range of general competencies, then peer review (see figure 23).

Figure 23: Which was the most difficult [CET element] to complete? Base size: 218

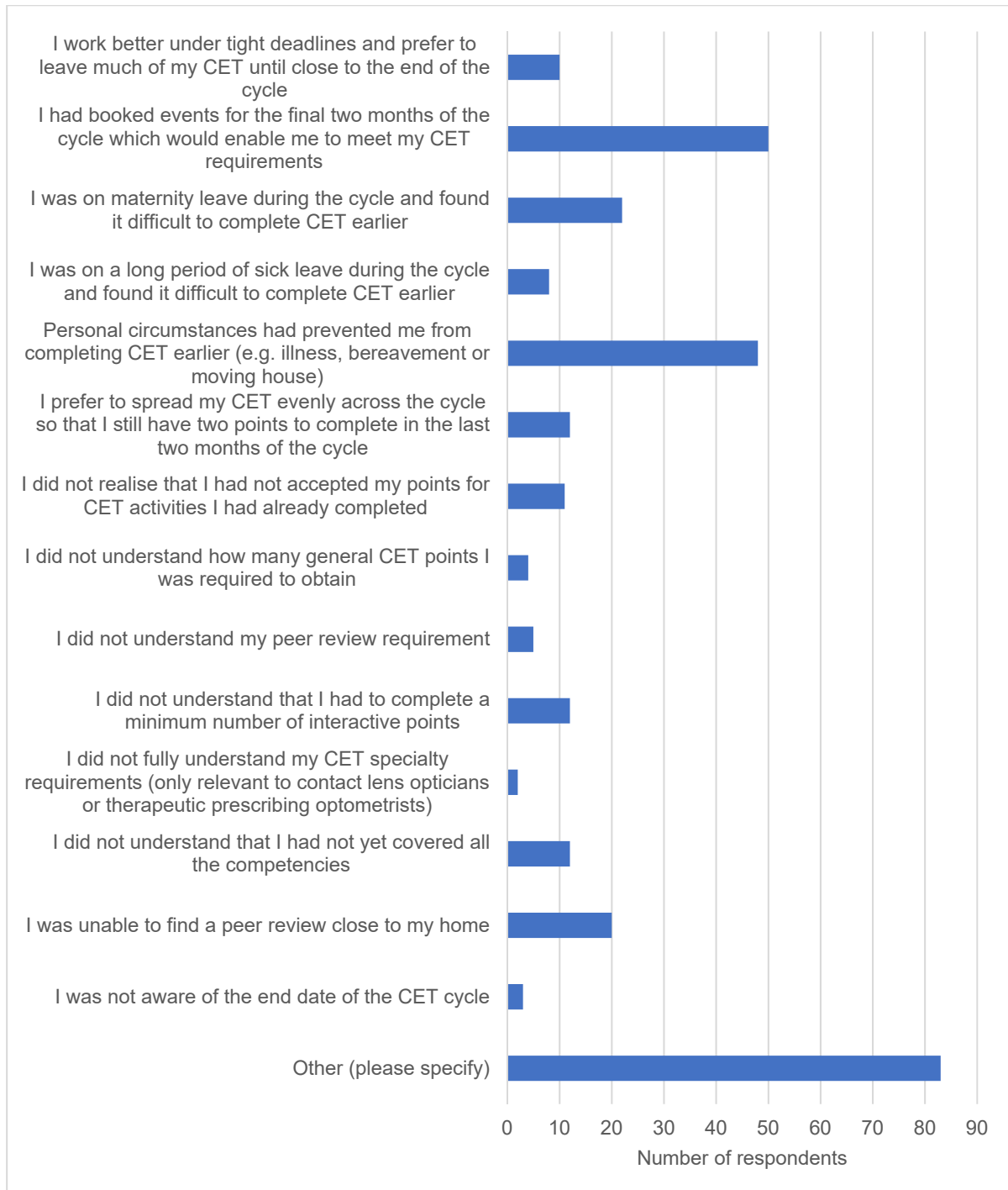


We explained to registrants completing the survey that we were interested in why some registrants still had outstanding CET requirements close to the end of the three-year cycle and whether it would be helpful for the GOC to provide any additional help or assistance. We provided a range of possible options of which registrants were able to select all that applied. Figure 24 shows that the most popular options were that registrants had booked events for the final two months of the cycle that would enable them to meet their CET requirements (23% of respondents) and that personal circumstances had prevented them from completing their CET earlier (22% of respondents).

The 'other' option was selected by 83 respondents who gave reasons in free-text comments. The following themes were noted by two or more respondents (although the weight given to these themes should be proportionate given the small sample size):

- difficulties in finding local events (particularly those that covered specific competencies and interactive points);
- lack of time to do CET or to travel to CET events;
- difficult to take time off to do CET (especially if a locum);
- family commitments;
- commitment to CPD activities that did not count as CET;
- miscalculation of points or misunderstanding that peer review was not available until 31 December;
- unfairness of doing CET without financial help for dispensing opticians; and
- forgetfulness, laziness or boredom/don't like doing CET.

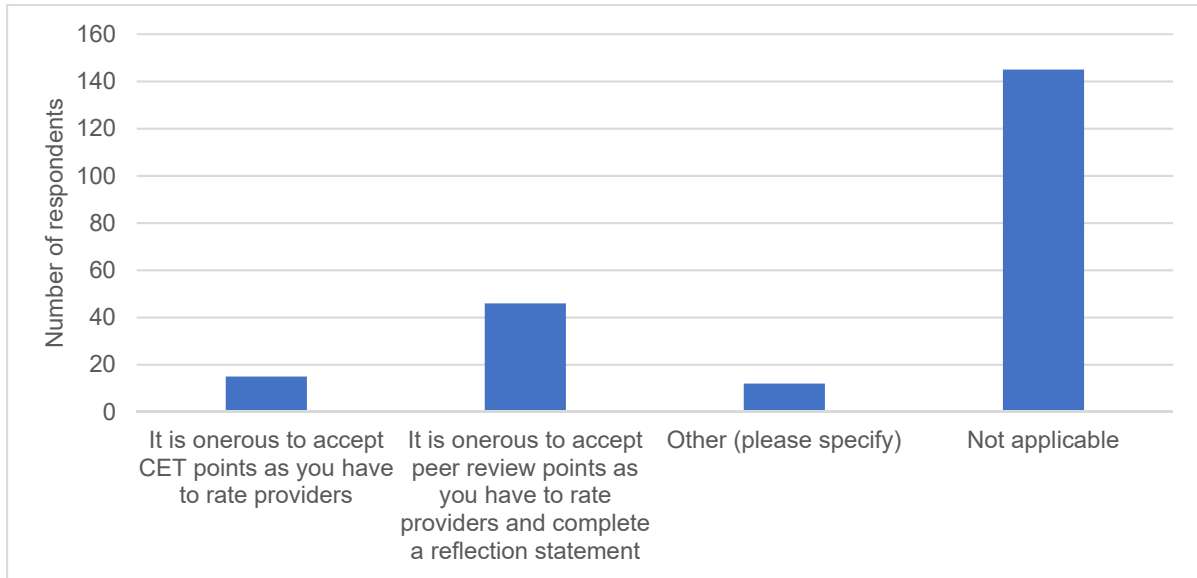
Figure 24: Why had you not completed your CET requirements as of 31 October 2018?
 Base size: 218



We asked registrants if they had completed their requirements prior to the 31 October 2018 but had not accepted them on the MyCET system, and if so, why this was the case. Figure 25 shows that 33% of survey respondents would have completed their CET requirements if they had accepted them on MyCET, with the majority indicating that it was onerous to accept peer review points.

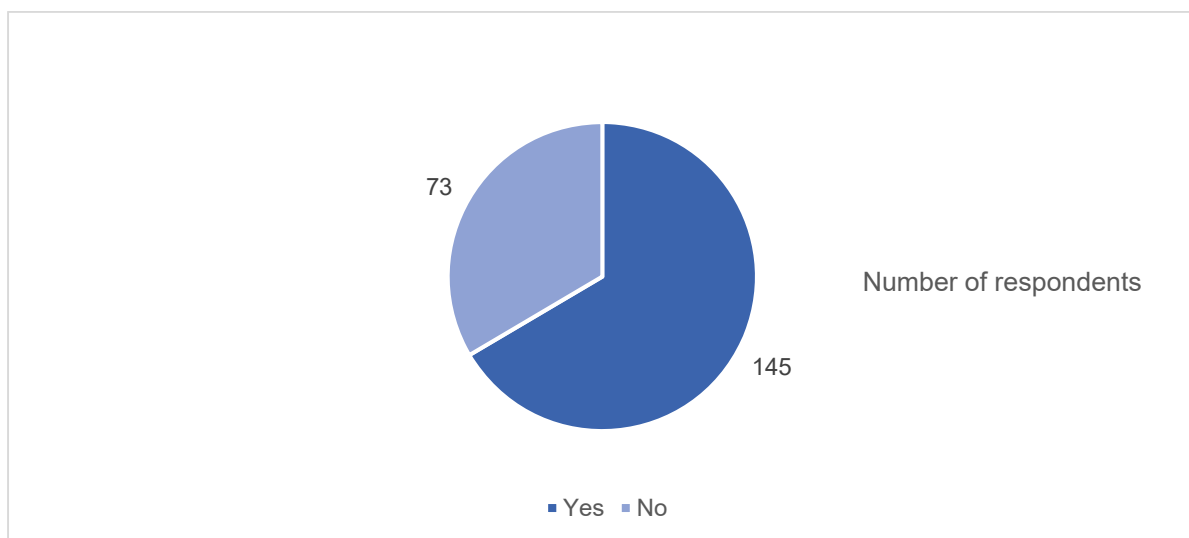
The 'other' option was selected by 14 respondents who mentioned issues such as forgetfulness, difficulties in logging in to MyCET, lack of time or confusion over specialty/general points.

Figure 25: If you had completed your CET requirements previously, but did not accept your CET points on MyCET until the last two months of the cycle, why was this the case? Base size: 218



We asked registrants if they had intended to complete their CET requirements prior to 31 October 2018. Figure 26 shows that two thirds (67%) of registrants had intended to do so.

Figure 26: Had you intended to complete all of your CET requirements prior to 31 October 2018? Base size: 218



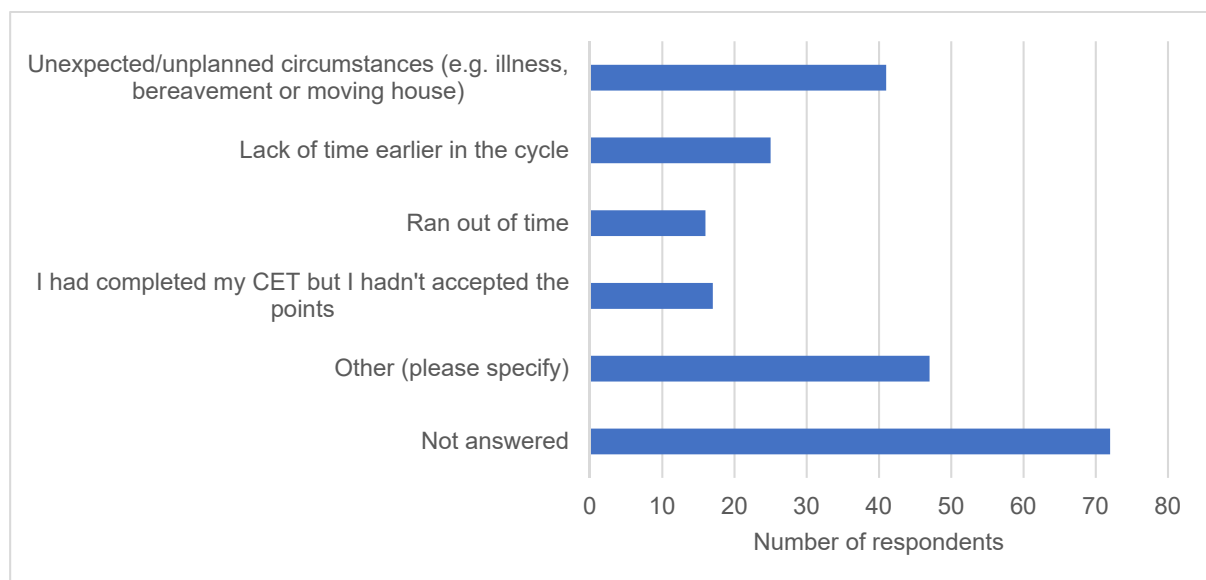
We asked registrants what had prevented them from completing their CET requirement prior to 31 October 2018, where they had originally intended to do so.

Figure 27 shows that of the 146 registrants of which the question was relevant to, 28% said it was due to unexpected or unplanned circumstances and 17% said it was because of a lack of time earlier in the cycle.

Of the 47 registrants that had selected the 'other' option, the following themes were noted from the individual free-text comments by two or more respondents (although the weight given to these themes should be proportionate given the small sample size):

- busy home and working lives;
- difficulty in obtaining interactive points or points to cover all the competencies;
- difficulty in finding CET close to home; and
- confusion over the peer review requirements (anecdotally we know that registrants confuse peer review with discussion workshops).

Figure 27: If you had intended to complete all of your CET requirements prior to 31 October 2018 but had not done so, what had stopped you doing so? Base size: 218



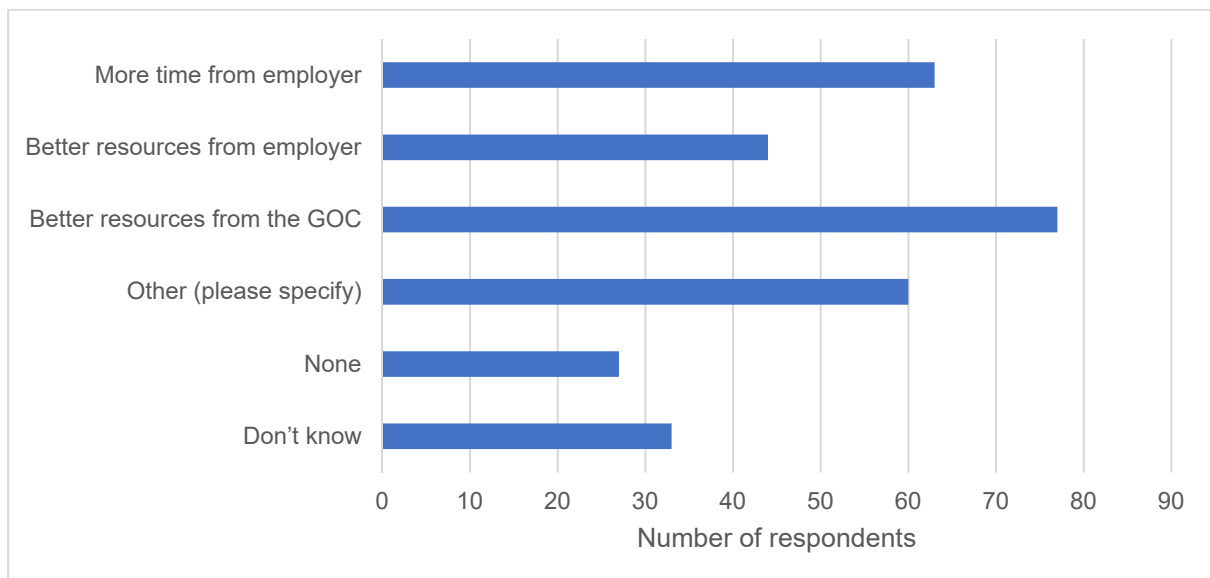
We asked registrants what extra support they could be given to help them plan their CET across the cycle. Figure 28 shows that 35% would like better resources from the GOC, 29% would like more time from their employer and 20% wanted better resources from their employer.

Of the 60 respondents that selected 'other', the following themes emerged from the individual free-text comments (noted by two or more respondents, although the weight given to these themes should be proportionate given the small sample size):

- more peer review and interactive events available throughout the country or an alternative to peer review;
- easier points sign-off process;
- better resources/interactive CET for locums;

- payment for attending CET / funded CET;
- help with / understanding around career breaks or long-term illnesses / other personal circumstances;
- lowering the points requirements, including interactive, especially for those on maternity leave; and
- more interactive points available online.

Figure 28: What extra support could registrants be given to help them to plan their CET across the cycle? Base size: 218

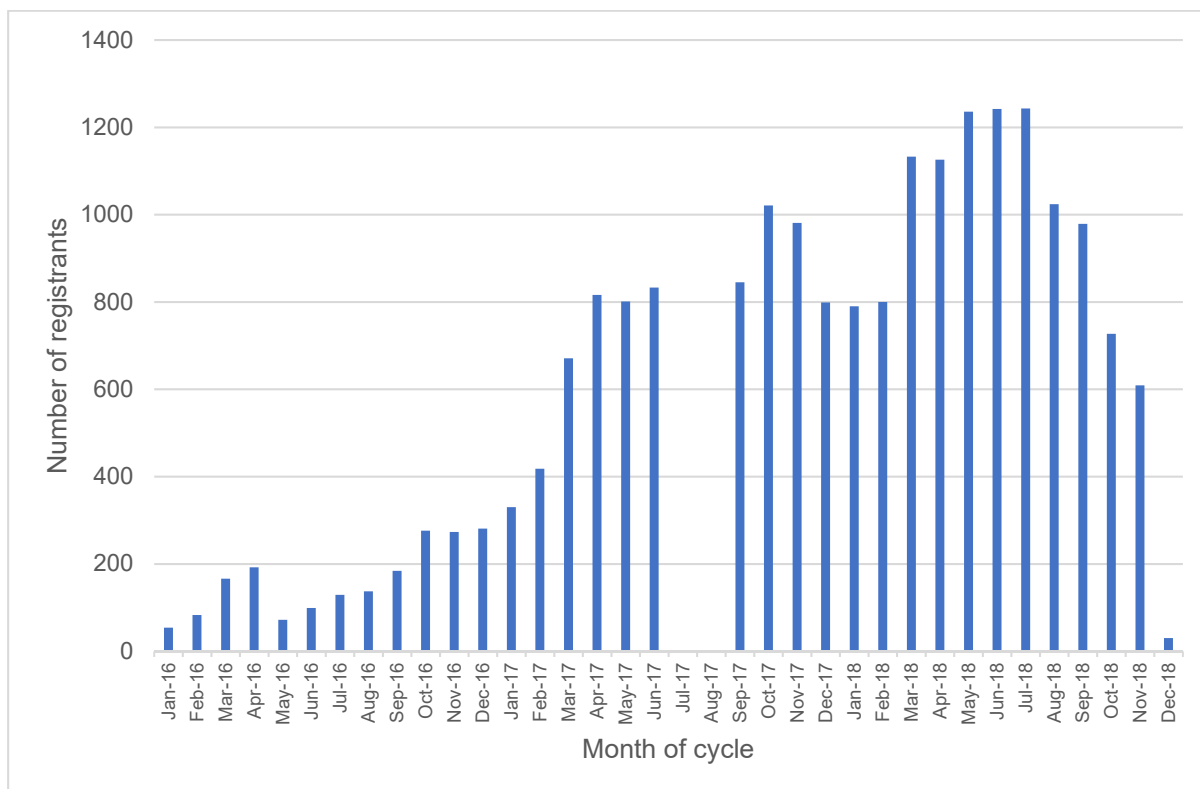


Please see section 3.1.10 for further results from this survey relevant to our reminders about the end of the CET cycle.

3.1.8 How many registrants would have completed their CET requirements sooner if they had accepted CET points and verified completion of CET activities earlier in the cycle?

We wanted to look at those who had completed their CET activities and would have met their points requirements earlier in the cycle if they had verified completion of CET activities and accepted their points on MyCET (NB we used CET points as a measure of completion of requirements rather than the full CET cycle requirements). Figure 29 shows the number of registrants in any given month who could have met their general points requirement in that month, but accepted their outstanding CET points at a later date. We found that there was an average of 2% of registrants in any given month that could have completed CET requirements at an earlier stage and this increases as you move towards the third year of the cycle. In particular, there were around 1,100 registrants who we would not have legally obliged to write to that would have had outstanding CET requirements as at 31 October 2018, had they accepted their outstanding CET points earlier.

Figure 29: Number of registrants in any given month who could have met their general points requirement in that month if they had accepted all their outstanding CET points⁵



3.1.9 Do registrants stop accepting CET points and verifying completion of CET activities after they have completed their minimum requirements and/or do registrants stop doing CET after they have completed their minimum requirements?

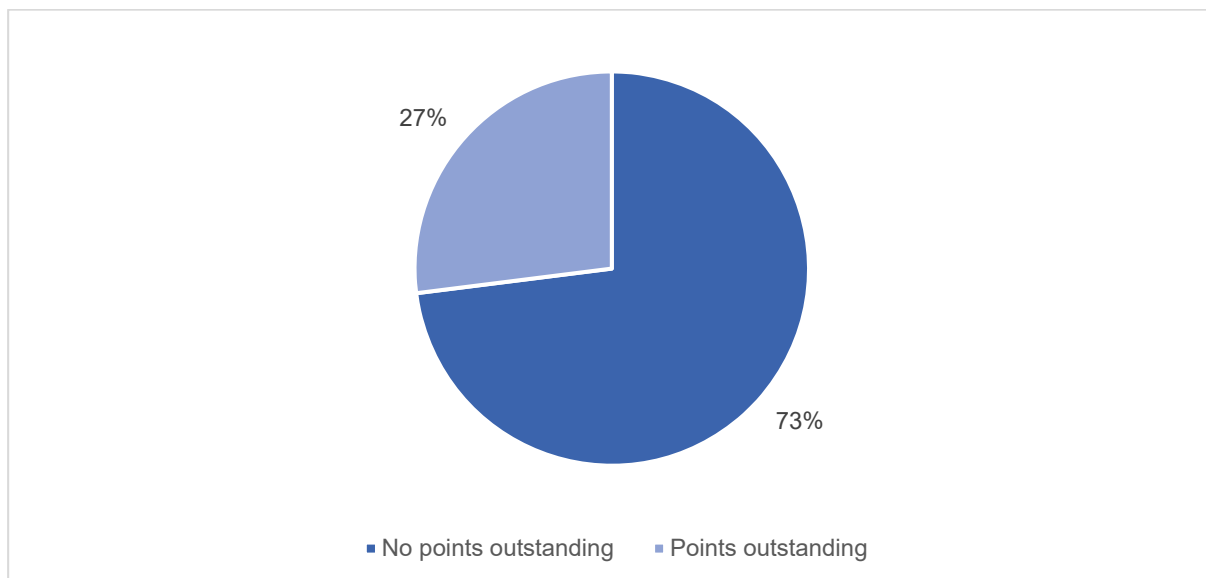
As part of the compliance process to ensure that registrants have completed their CET requirements, CET providers are required to upload confirmation of completion of a CET activity to the MyCET records of registrants who participated in that activity. To protect against incorrect uploading, the registrant is then required to go into their own record and ‘accept’/verify that they completed that CET activity in order for the associated points, competencies and other elements to be logged against their record. Anecdotal feedback suggested that some registrants do not continue to accept and verify their CET activities after they have completed their minimum CET requirements. To explore further, we specifically looked at CET points as a measure, to determine how many of these had not been accepted and verified at the end of the CET cycle. We found that there were 42,063 points that had not been accepted by 27% of registrants (see figures 30 and 31 below). If these points were divided equally between those 27% it would equate to seven points per registrant.

⁵ We do not have the data for July and August 2017 and this cannot be obtained retrospectively.

Figure 30: Number and percentage of registrants with unaccepted CET points

Points	Percentage of registrants	Number of registrants
No points outstanding	73%	16,736
Points outstanding	27%	6,086

Figure 31: Percentage of registrants with unaccepted CET points

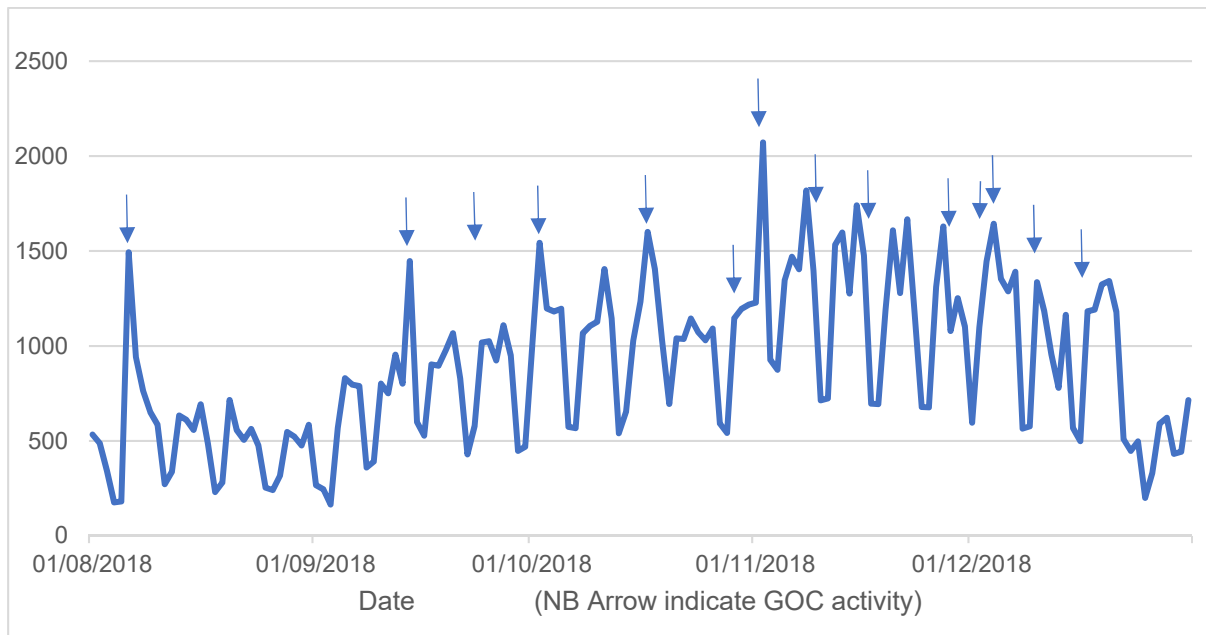


3.1.10 What effect do GOC interventions have on CET completion rates e.g. did our end of year and end of cycle communications increase completion rates?

In the last year of the cycle, and particularly in the last six months, we targeted our communications to those who had not yet met their CET requirements to encourage them to ensure that they had planned their CET and that they knew that they had to log in to MyCET to accept their points. We communicated through the registrant eBulletin and Tweets that went to all registrants and sent regular emails to specific groups of registrants, as well as the formal letter that we were legally obliged to send to registrants who had not met their CET requirements as at 31 October 2018.

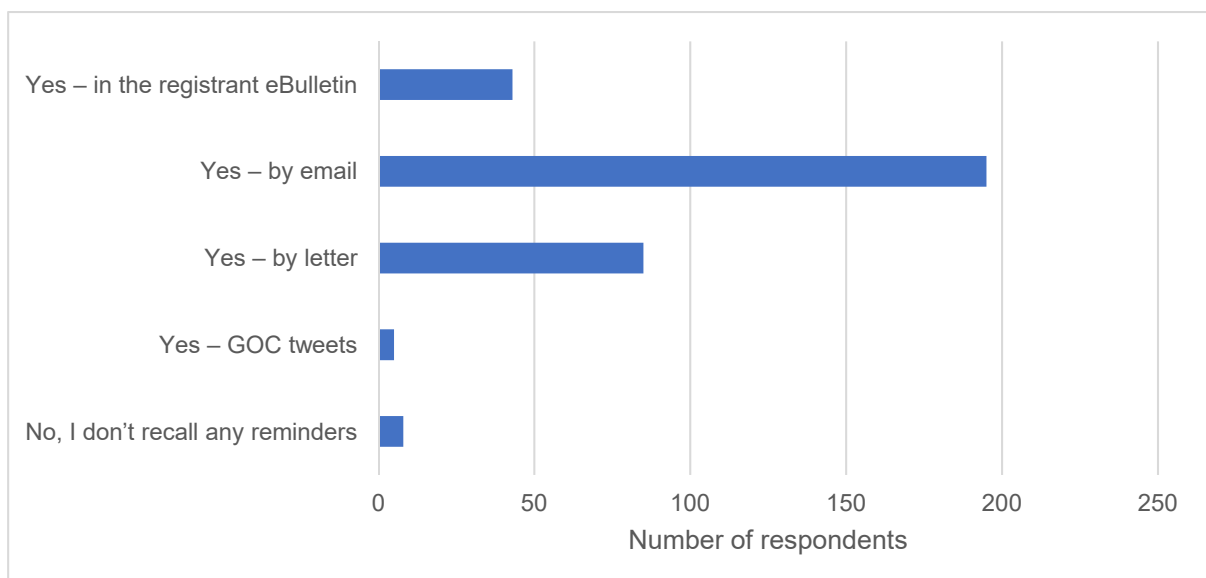
We reviewed the number of MyCET page views recorded by Google Analytics and found significant increases in MyCET activity in the days following the targeted emails that we sent. Figure 32 gives an illustration of the peaks in MyCET activity, with GOC interventions indicated with an arrow. There are clearly peaks in MyCET activity within a few days of our interventions.

Figure 32: Effect of emails on number of users accessing MyCET



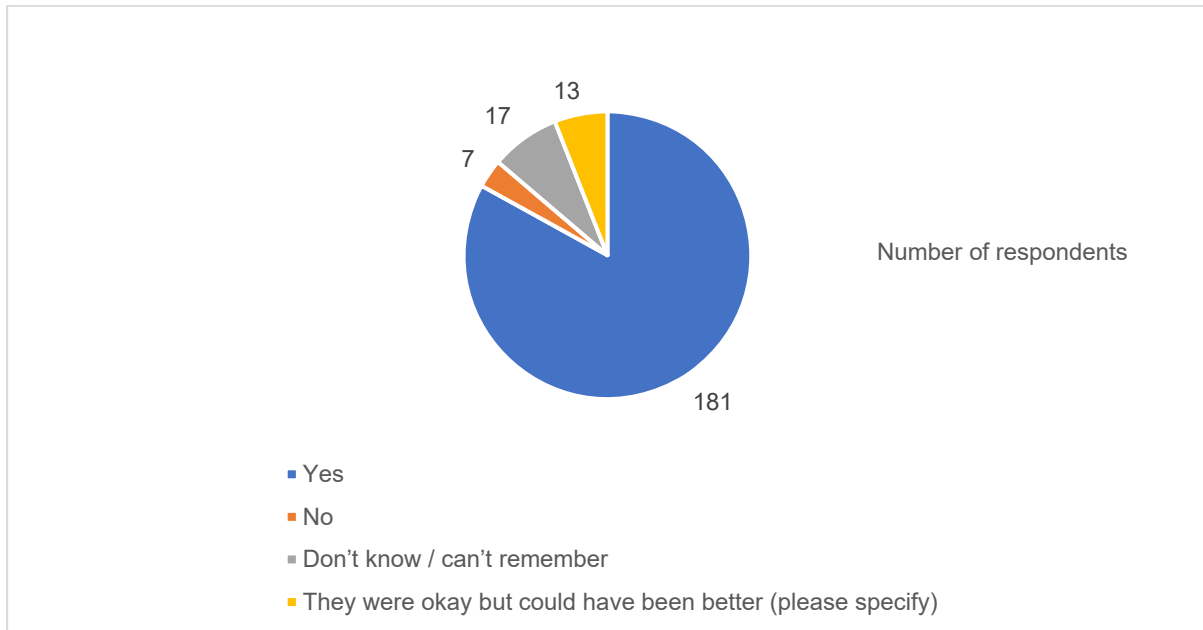
We also asked registrants who had not completed their CET requirements as at 31 October 2018 some questions about our reminders, as part of our survey (see section 3.1.7). Figure 33 shows that nearly all (89%) of the 218 registrants taking part in the survey recalled receiving our email reminders and 39% recalled receiving the letter.

Figure 33: Do you recall receiving reminders about the end of the CET cycle? Please tick all that apply. Base size: 218



We asked registrants whether the reminders were clear and easy to understand. Figure 34 shows that 83% of respondents agreed, with only 3% disagreeing, 17% not sure and 6% thinking that they could have been better.

Figure 34: Were reminders you received about the end of the CET cycle clear and easy to understand? Base size: 218

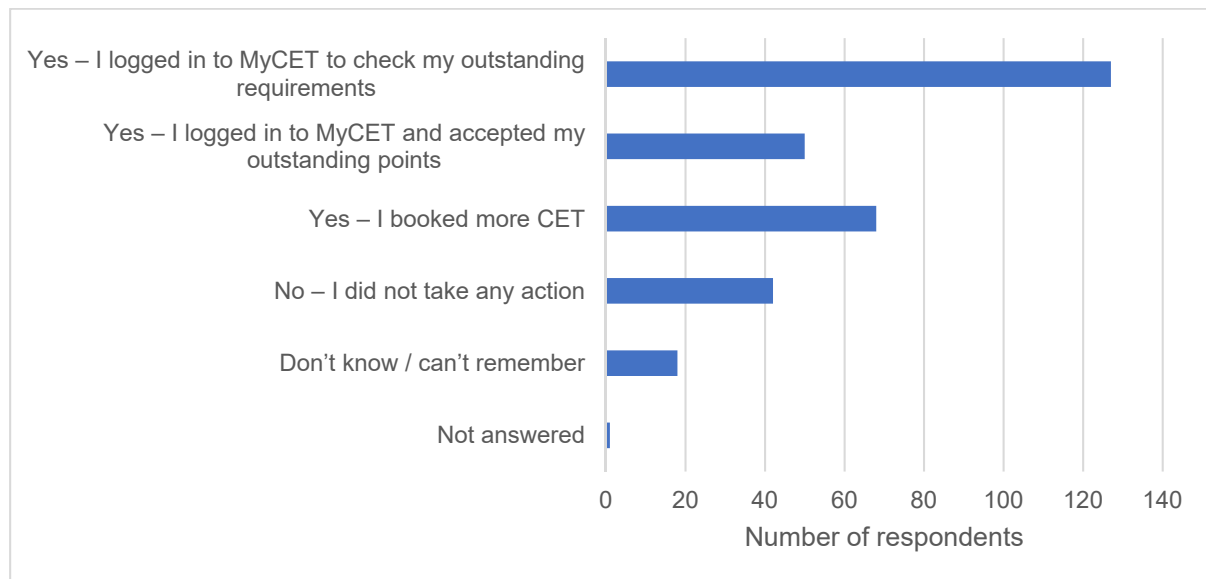


Of the 13 respondents that thought the reminders could have been better, the following individual free-text comments were noted (although the weight given to these themes should be proportionate given the small sample size):

- recorded letters were costly/unnecessary and annoying to pick up from the post office;
- they could have been more personally relevant; and
- the letters were incorrectly timed and heavy-handed.

We asked registrants whether they took any action once they received a reminder (they were able to select more than one response). Figure 35 shows that 58% of registrants logged into MyCET to check their outstanding requirements, 23% logged into MyCET to accept outstanding points, 31% booked more CET and 19% did not take any action.

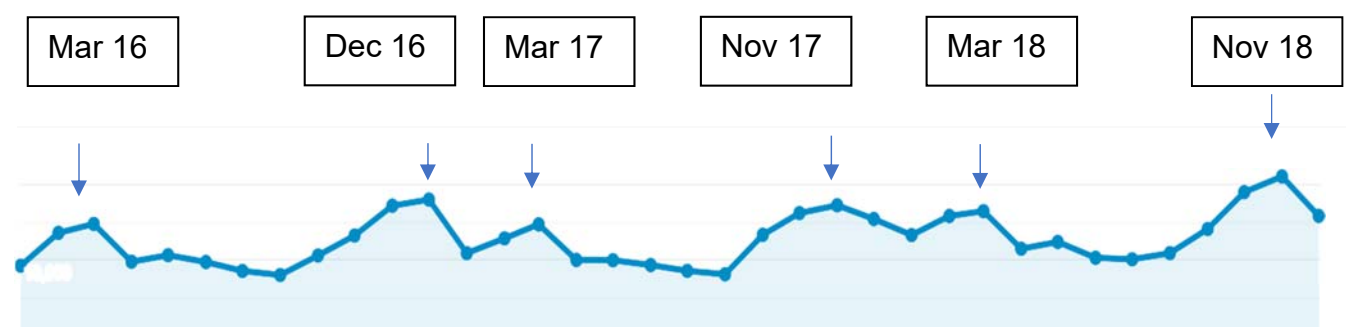
Figure 35: Did you take any action after you received a reminder about the end of the CET cycle? Please tick all that apply. Base size: 218



3.1.11 Where were the peaks in usage of MyCET and what might these have related to?

We looked at the pattern of activity in MyCET and noted that there were several peaks in activity as can be seen in figure 36. Given that the main peaks related mainly to March, November and December, these were likely to be due to our registration renewal period and CET reminders at the end of each year to remind registrants to obtain six points or to complete their CET requirements prior to the end of the cycle. They may also have related to external conferences.

Figure 36: Peaks in usage of MyCET across the 2016-18 CET cycle



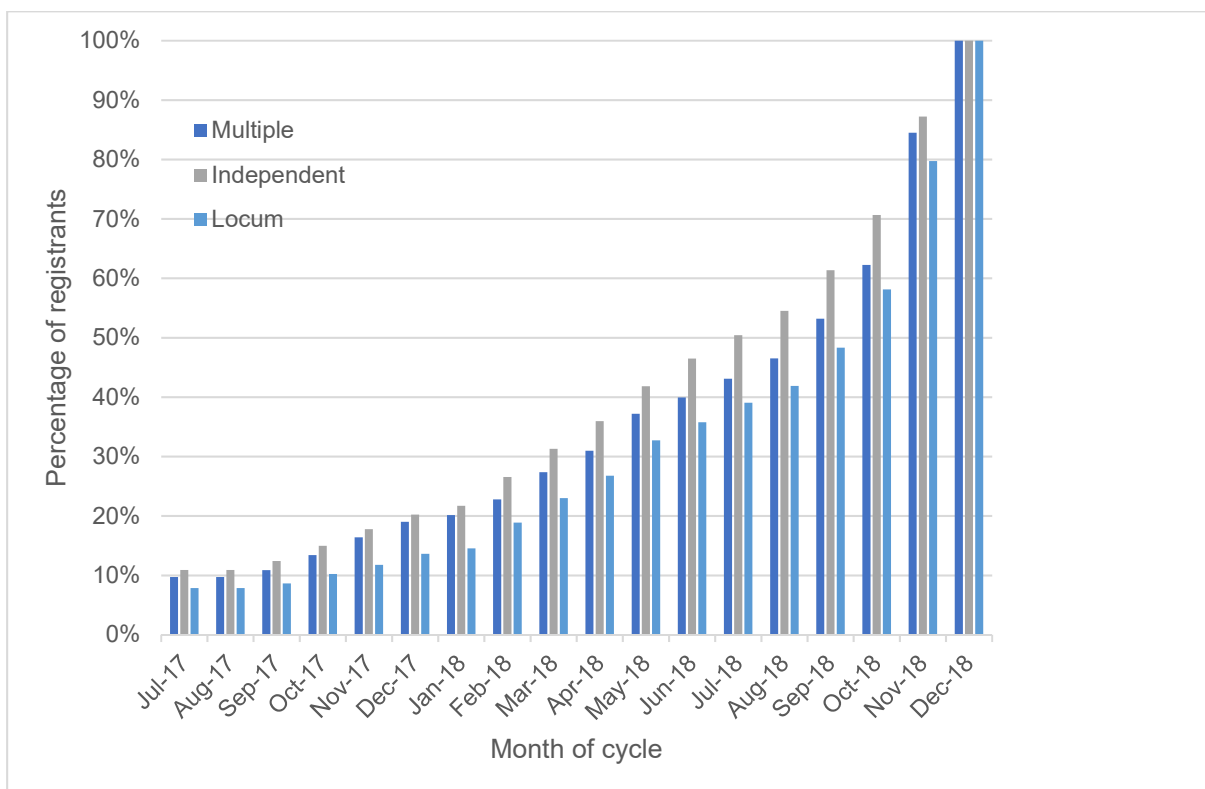
3.1.12 Are there any significant differences in CET completion rates between those registrants who work for multiples/independents or who are locums?

We looked at the CET completion rate figures for registrants who had self-declared as working for multiples, independents and as locums. We found that the pattern of

numbers finishing their CET requirements across the cycle was similar. However, those who worked in independents were much more likely to complete their CET requirements sooner than those who worked in multiples, with a significantly lower rate for those who worked as locums. A greater percentage of locums finished their requirements in the last two months of the cycle compared with those working in multiples or independents. Figure 37 shows the pattern of completion across the last 18 months of the cycle.

We looked at the differences between those registrants working in multiples and those working in independents between January 2016 and October 2018. This shows that on average 0.25% registrants working in independents completed their CET requirements in any given month. This creates a cumulative variance of 8.5% by the end of October 2018 i.e. 8.5% fewer registrants in multiples have met the requirements compared to registrants in independents by the end of October 2018, which equates to 822 registrants. The cumulative totals for October 2018 are 62.3% for those working in multiples and 70.6% for those working in independents.

Figure 37: Percentage of registrants who finished the overall CET requirement by month of cycle and employment status

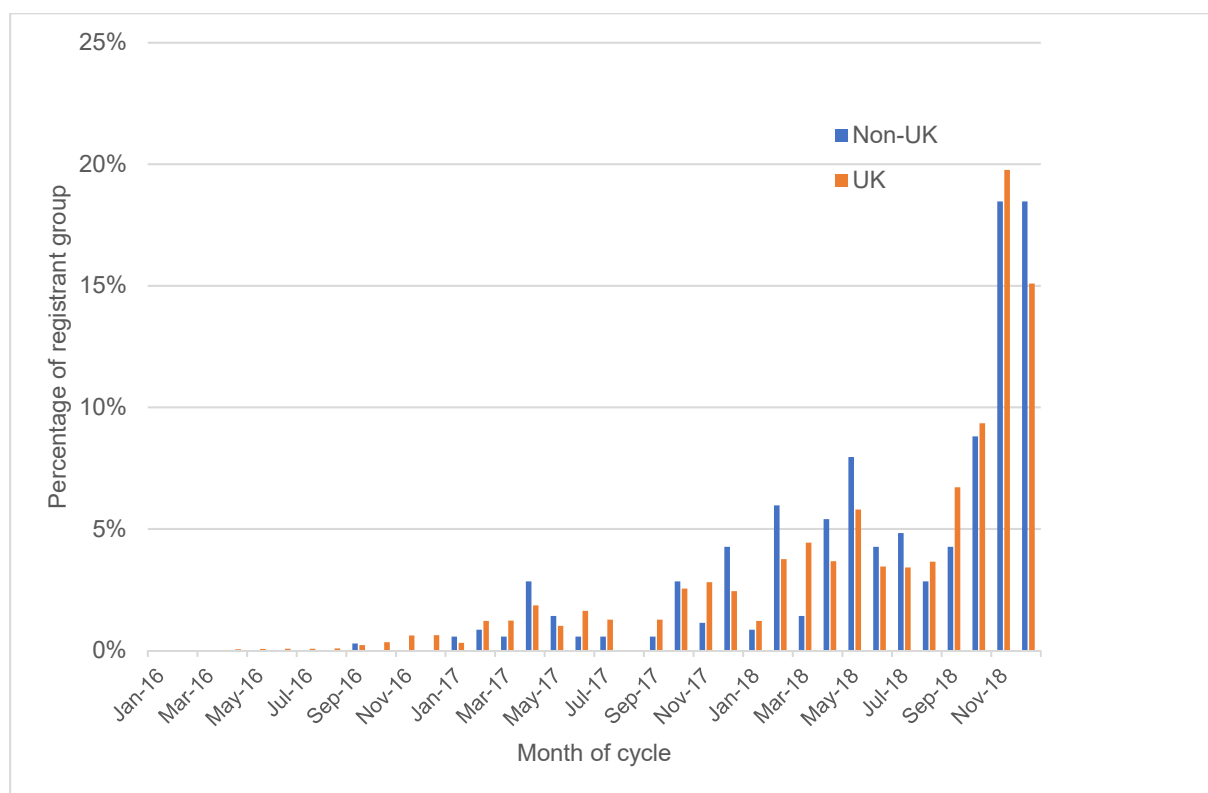


3.1.13 Is it more difficult for registrants who live outside the UK to complete their CET requirements?

We hear anecdotal evidence that registrants who live outside the UK find it more difficult to complete their CET requirements. We looked at the months in which

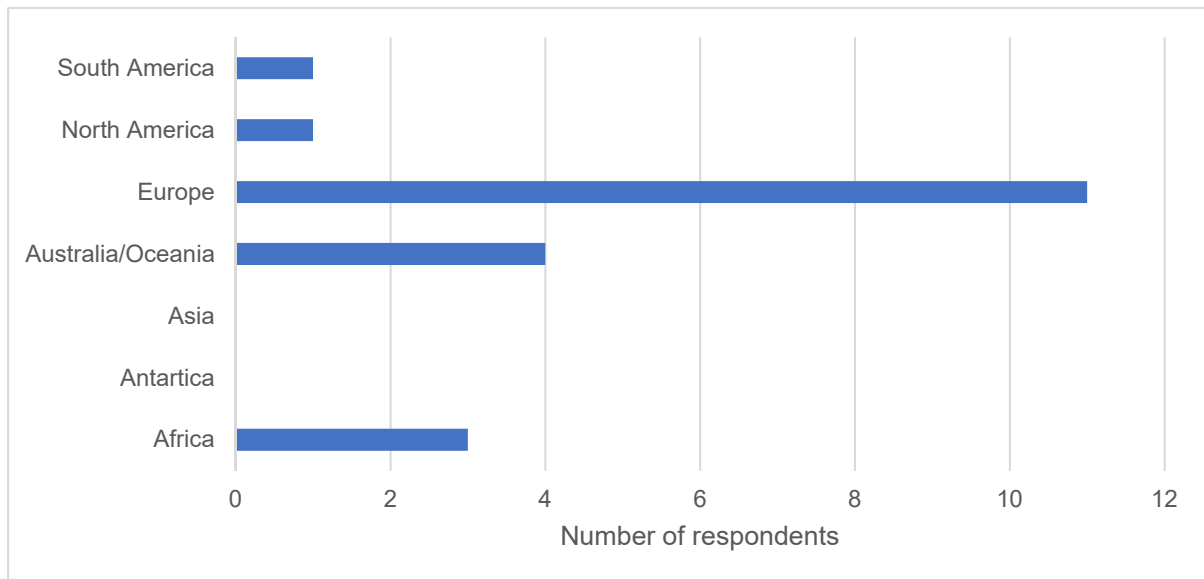
registrants finished their CET requirements for comparison between registrants who are based in the UK with those who are based outside the UK (referred to as 'non-UK'). The first month that significant numbers of registrants achieved their CET requirements was September 2018 (four registrants had met their requirements in March 2016 but this was not statistically significant), so there are 28 months for comparison across the cycle for comparison purposes. Figure 38 below shows that in 16 out of the 28 months of the cycle, a higher proportion of UK registrants finished their CET requirements than non-UK based registrants, which means that there were a significant number of months in the cycle where a higher proportion of non-UK registrants finished their CET requirements than UK registrants.

Figure 38: Percentage of registrants achieving the overall CET requirements each month: UK and non-UK registrants



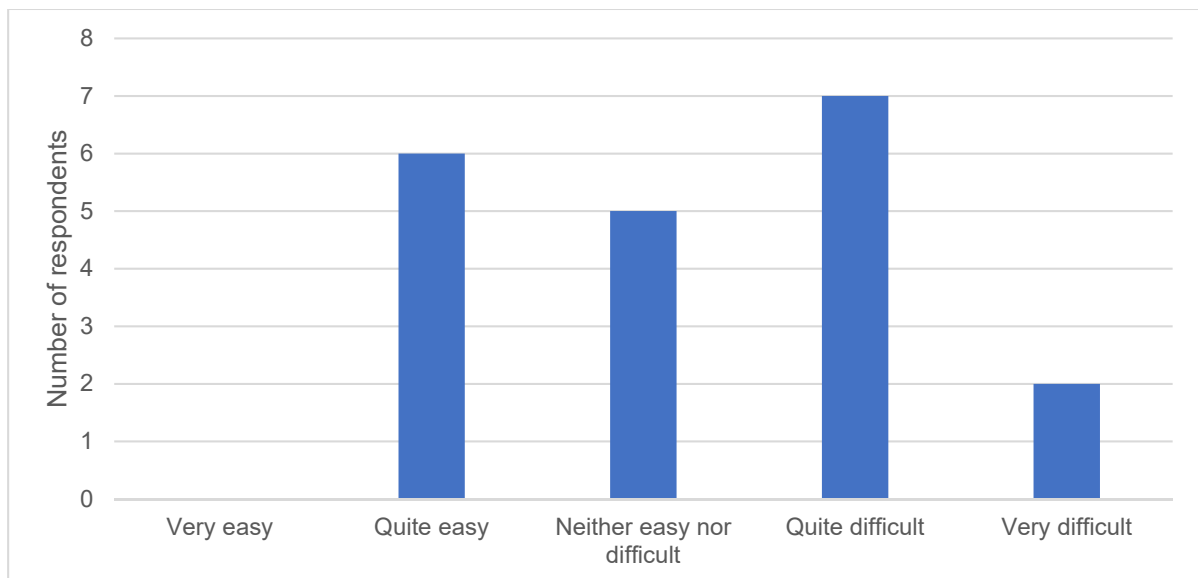
We surveyed our registrants based outside the UK. We invited approximately 400 registrants to take part in the survey and received 20 responses. Due to the very low response rate, care should be taken about how representative these results are, but they will give some indication of the experience of those registrants based outside the UK. Of the registrants that responded to the survey, 95% had met their CET requirements. Figure 39 shows that over 50% of respondents were based in Europe.

Figure 39: Number of registrants by geographical area (non-UK registrants). Base size: 20



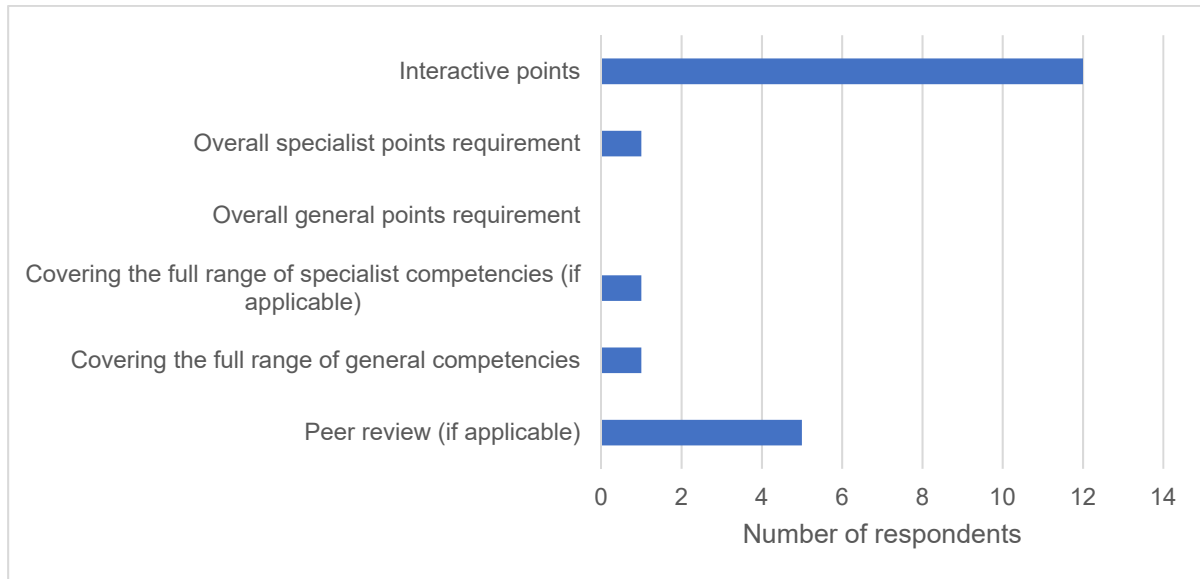
We asked the respondents how easy they found it to complete their CET requirements. Figure 40 shows that 30% of respondents found it quite easy, 25% found it neither easy nor difficult, and 45% found it quite or very difficult.

Figure 40: Ease of completing CET requirements (non-UK registrants). Base size: 20



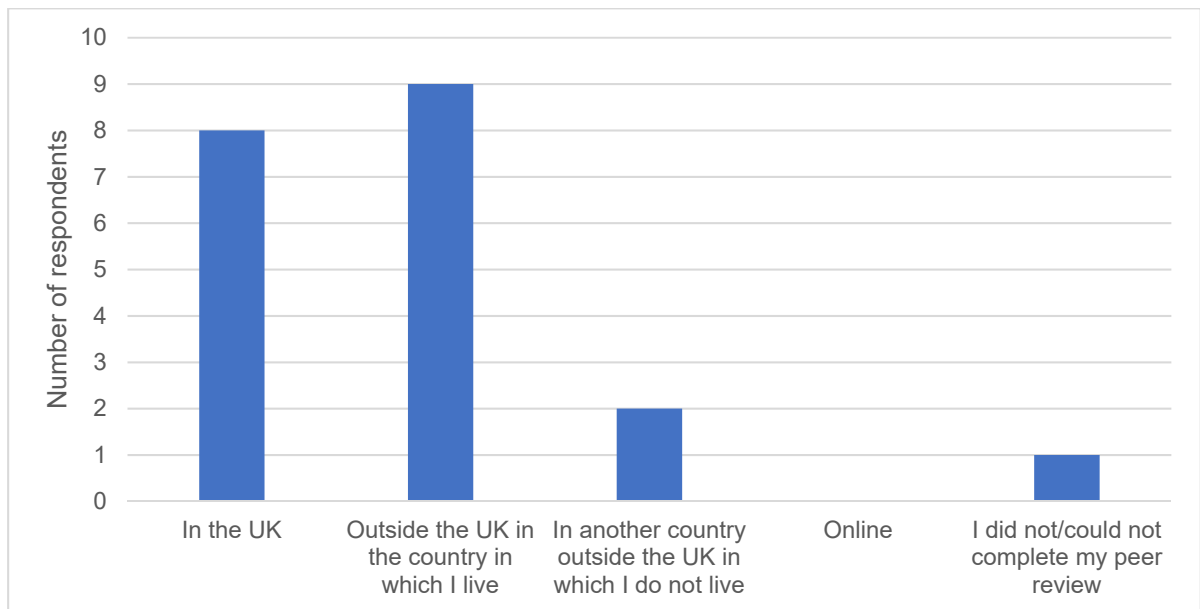
We asked respondents which element of CET was the most difficult to complete. Figure 41 shows that interactive points were by far the most difficult, with 60% of respondents selecting this option. The next most difficult option was peer review (25%).

Figure 41: Most difficult CET element (non-UK registrants). Base size: 20



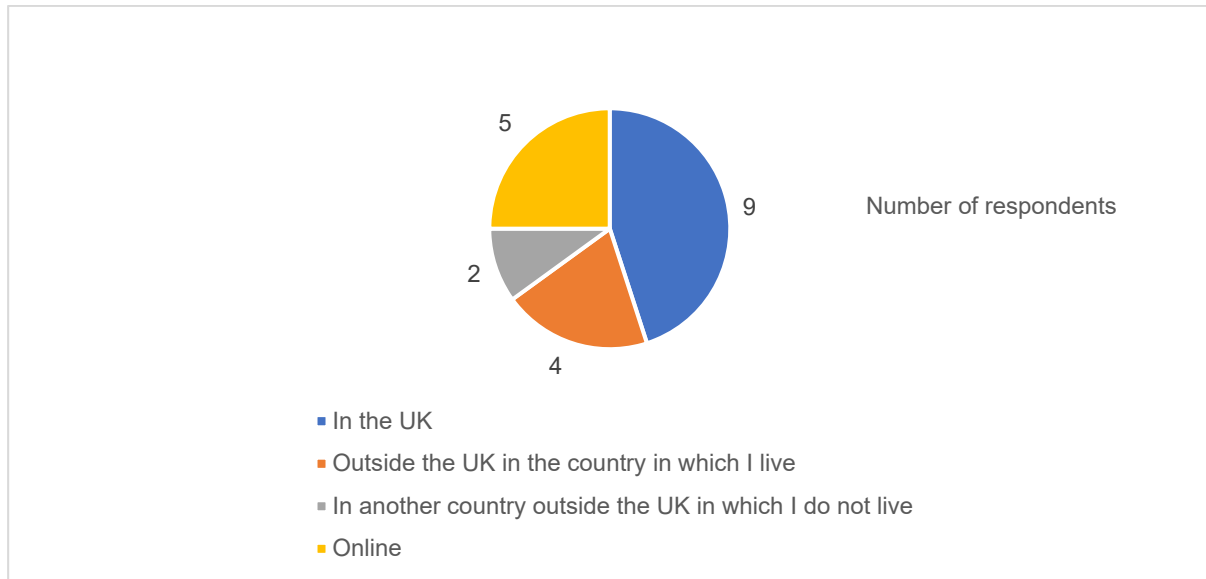
We asked respondents where they completed their peer review. Figure 42 shows that 45% had completed it in the country in which they live, 40% had completed it in the UK, 10% had completed it in another country and 5% had not been able to complete it.

Figure 42: Location of peer review completion (non-UK registrants). Base size: 20



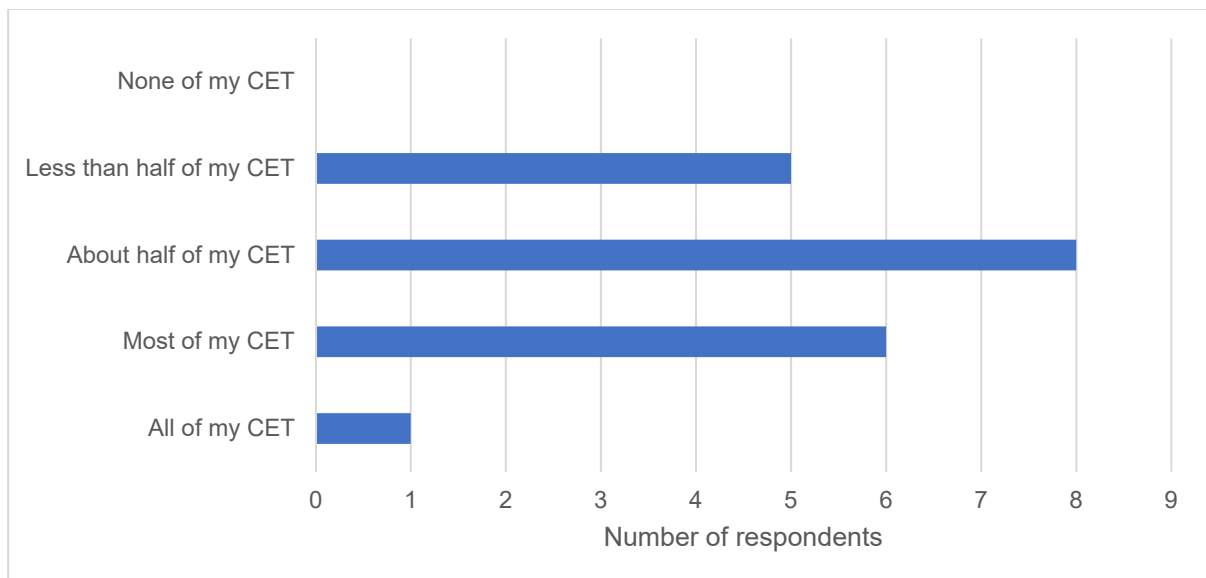
We asked respondents where they had completed most of their interactive points. Figure 43 shows that 45% of respondents completed it in the UK, 25% completed it online, 20% completed it in the country in which they live and 10% completed it in another country.

Figure 43: Where most of interactive CET undertaken (non-UK registrants). Base size: 20



We asked respondents how much of their CET was undertaken online. Figure 44 shows that 40% of respondents completed half of their CET online, 30% completed most online, 25% completed less than half online and 5% completed all of it online.

Figure 44: Amount of CET activities completed online (non-UK registrants). Base size: 20



We asked respondents whether they had applied to have any activities that they were attending outside the UK to be recognised as CET (through MyCET). Figure 45 shows that only 20% of respondents had applied.

Figure 45: Ever applied to have non-UK activities recognised as CET (non-UK registrants). Base size: 20

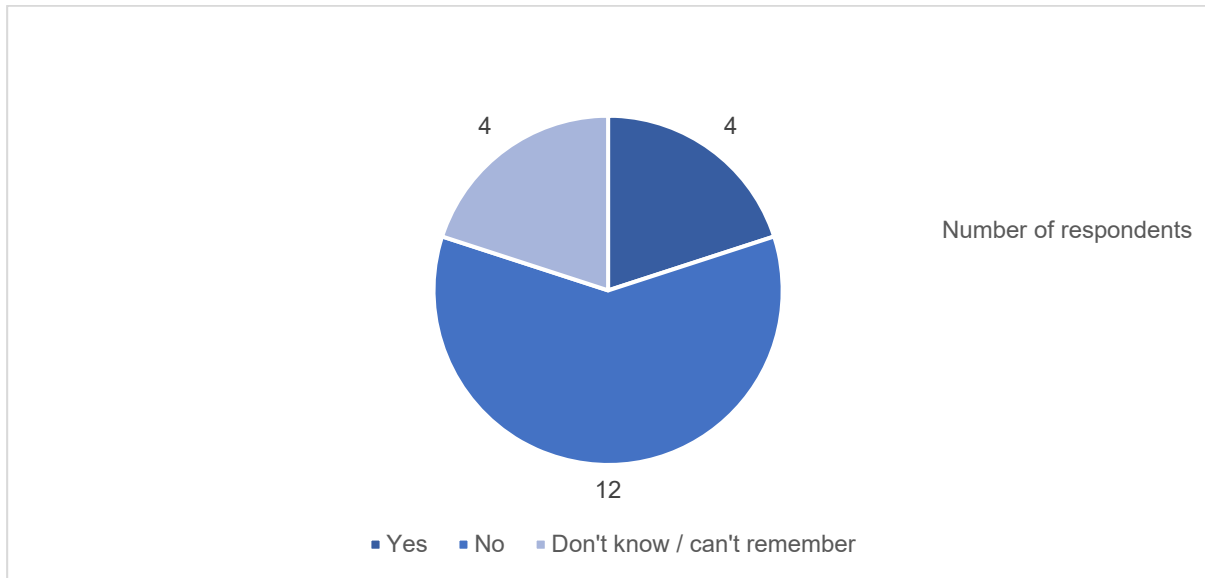
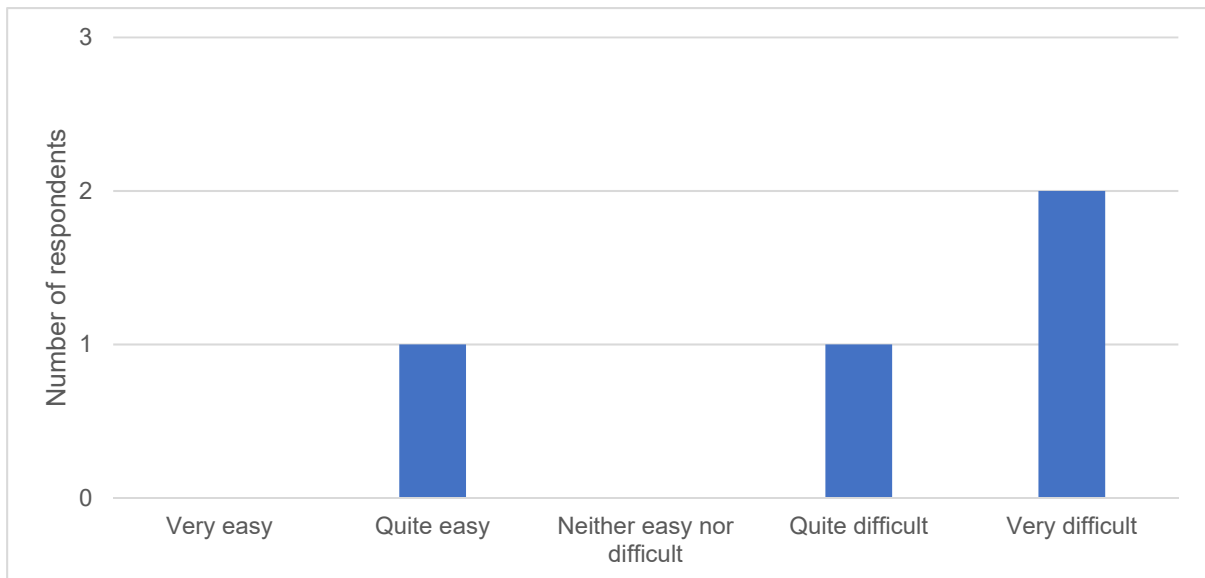


Figure 46 shows that of the four respondents that had applied to have any activities that they were attending outside the UK to be recognised as CET, 75% of them found the process to be quite or very difficult. One respondent (25%) found it quite easy.

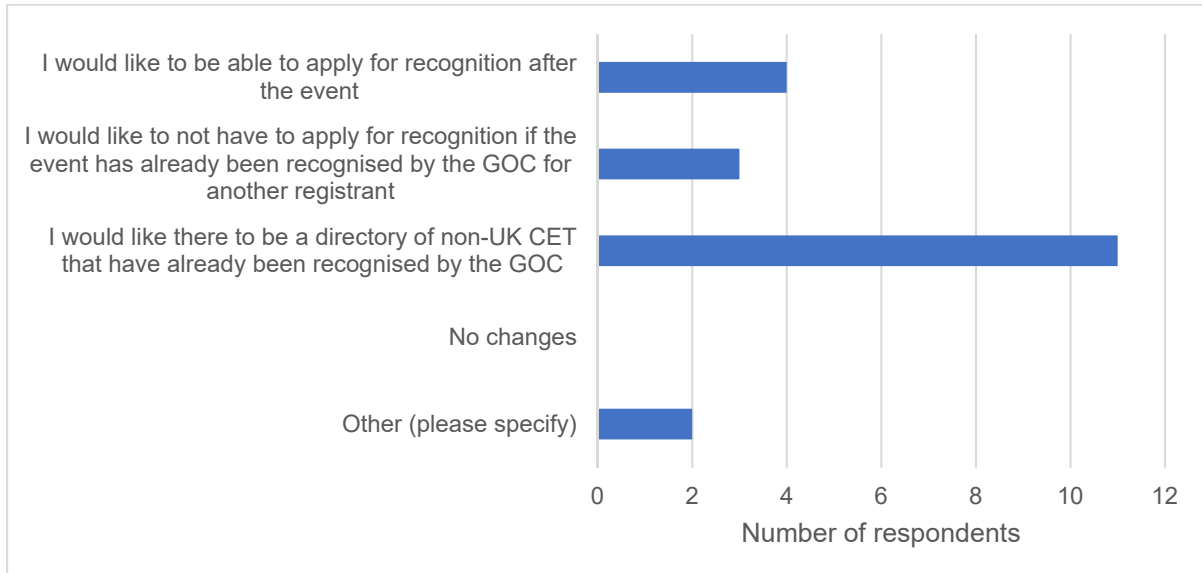
Figure 46: Ease of applying to have non-UK activities recognised as CET (non-UK registrants). Base size: 4



We asked if there were any changes that registrants would like to see to the process for recognising non-UK activities as CET. Figure 47 shows that 55% said they would like there to be a directory of non-UK CET that has already been recognised by the GOC, 20% would like to be able to apply for recognition after the event and 15%

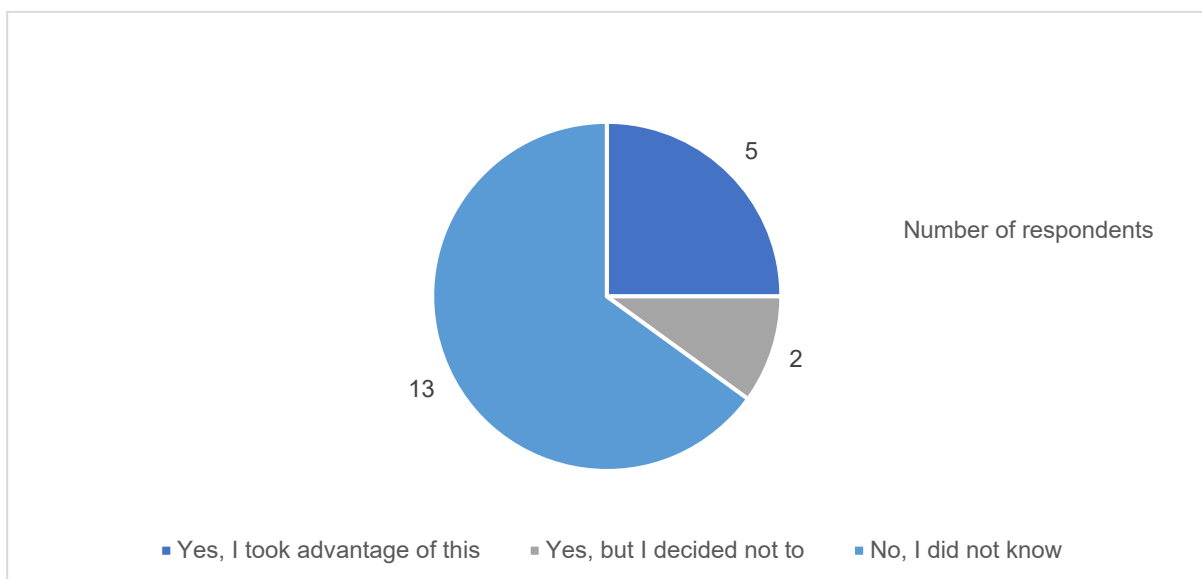
would like to not have to apply for recognition if it has already been approved by the GOC for another registrant.

Figure 47: Changes to process of applying to have non-UK activities recognised as CET (non-UK registrants). Base size: 20



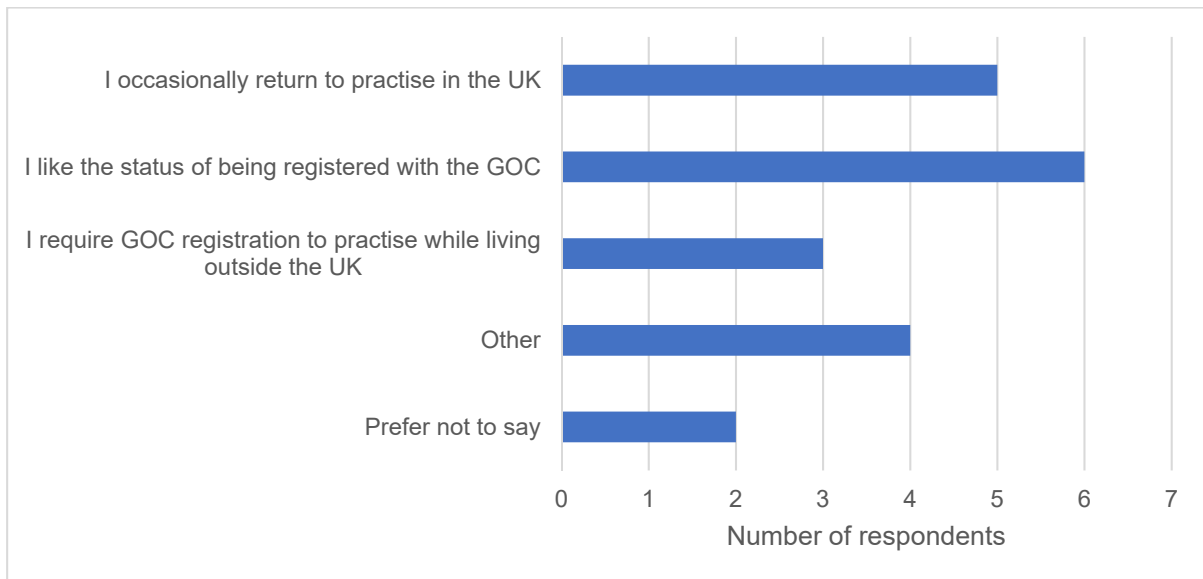
We asked registrants if they knew that they could arrange a registrant-led peer review with non-GOC registrants. Figure 48 shows that 65% of registrants said that they did not know that they could do this, 25% did know and had taken advantage of this and 10% knew but decided not to.

Figure 48: Did you know that if you are based outside the UK you can arrange a registrant-led peer review with non-GOC registrants (i.e. peers within your professional group not registered with the GOC)? Base size: 20



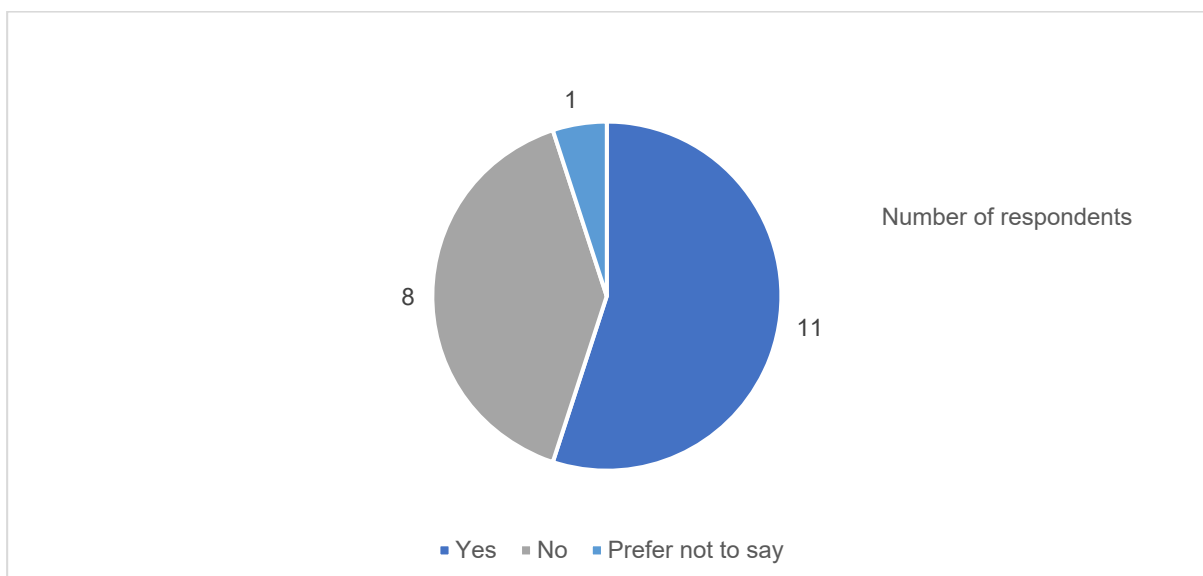
We wanted to understand why registrants based outside the UK maintain their registration with us and asked registrants what their main reason was. Figure 49 shows that the main reason (30%) was because registrants liked the status of being registered, 25% occasionally return to practise in the UK, 20% selected the 'other' option, 15% require registration to practise while living outside the UK and 10% preferred not to say. The four registrants that selected the 'other option' did not specify their reasons.

Figure 49: Main reason for maintaining GOC registration. Base size: 20



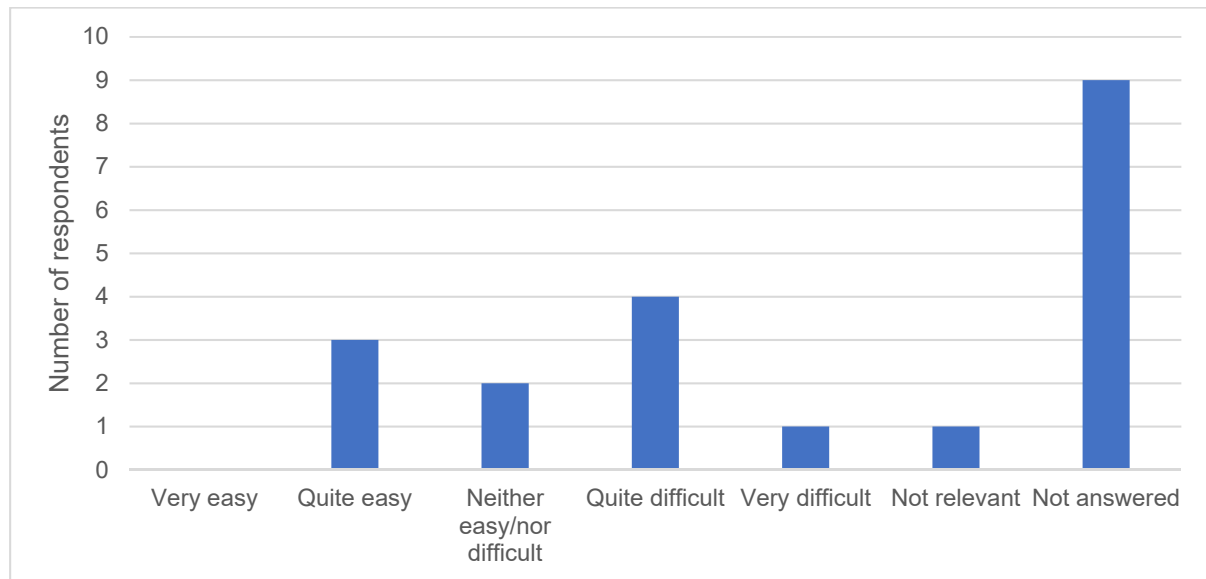
We asked whether registrants were required to complete CET/CPD for another regulator or professional body in their country of residence. Figure 50 shows that 55% of registrants were required to do so.

Figure 50: Are you required to complete CET/continuing professional development (CPD) for another regulatory/professional body in your country of residence? Base size: 20



We asked how easy it was to use the same CET/CPD requirements to meet our requirements as for the regulatory/professional body they are registered with in their country of residence. Figure 51 shows that 25% found it quite or very difficult, 15% found it quite easy and 10% found it neither either nor difficult. One registrant (5%) said the question was not relevant and 45% did not answer the question.

Figure 51: How easy is it to use the same CET/CPD to meet your GOC requirements as for the regulatory/professional body you are registered with in your country of residence? Base size: 20



Individual free-text comments from registrants on this question included:

- that it was difficult to obtain paper copies of CET certificates;
- their requirements are more onerous than the GOC's;
- the GOC gives less points per activity than in their country of residence;
- most of their CET is organised by their professional body; and
- clinical diagnostic points are required in their country of residence.

One registrant who completed the survey emailed us to tell us that they got a lot out of doing CET and were keen to maintain their registration, even if requirements became more difficult to meet following British exit from the European Union.

3.2 Compliance with CET requirements at end of CET cycle

3.2.1 How many registrants did not meet their CET cycle requirements?

As at the end of the 2016-18 CET cycle, we wrote to 565 registrants advising that they had not met their CET requirements. Of these, 130 registrants had already told us that they intended to retire or withdraw from the register at the end of the cycle, and so have not been included in the figures in this section. There were 435 remaining registrants who had not met their CET requirements (1.9% of the register). This was a slight increase from the 2013-15 CET cycle when we wrote to 337 registrants (1.6% of the register at the time). Figure 52 shows the breakdown by registrant groups.

Figure 52: Number and percentage of registrants who did not meet their 2016-18 CET cycle requirements

Registrant group	Percentage of registrants	Number of registrants
Optometrists	1.5%	224
Dispensing opticians	3.2%	184
Contact lens opticians	2%	25 ⁶
Therapeutic prescribers	0.3%	2 ⁷
Total of all registrants	1.9%	435

3.2.2 How many registrants disputed their CET outcome and what was the final outcome? Why did they need to dispute their CET outcome and how can we ensure there are less disputes going forwards?

Following the letter to registrants in January 2019 confirming that they had not met their CET requirements, we received 112 applications from registrants disputing the accuracy of their CET records (26% of the 435 registrants who did not meet their requirements). Of these applications, 75% were accepted i.e. we agreed with the registrant that our records were not accurate with the amount of CET they had completed and updated their CET record to reflect this. However, only 63% of the total disputes accepted led to the registrant remaining on the register as in some cases registrants had still not met the CET requirements required to remain on the general or specialty register. Figure 53 shows the full outcome of the dispute applications.

⁶ Of these 25, five had not met their general requirements and 20 had not met both their general and specialty requirements. An *additional* 16 contact lens opticians did not meet their contact lens specialty requirements but had met their requirements to remain on the register of dispensing opticians so are not included in these figures.

⁷ Of these two, both had not met their general and specialty requirements. An additional six therapeutic prescribers did not meet their therapeutic prescribing specialty requirements but had met their requirements to remain on the register of optometrists so are not included in these figures.

Figure 53: Outcome of dispute applications

Dispute outcome	Percentage	Number
Accepted – CET records amended and registrant remains on the register	63%	71
Accepted but still not met CET requirements – CET records amended and registrant removed from the register	9%	10
Accepted but still not met CET requirements for specialty – CET records amended and registrant removed from the specialty register	3%	3
Rejected – registrant removed from the register	16%	18
Void – registrant had already met CET requirements	2%	2
Withdrawn – registrant withdrew application	2%	2
Exceptional circumstances application – registrant was processed under this procedure instead of disputes	5%	6
Total	100%	112

Of the 84 applications that were accepted:

- 20 (24%) were solely due to the registrant not having accepted and verified CET they completed during the cycle;
- 55 (65%) related solely to providers who had not uploaded confirmation of completion of CET on MyCET in time for the registrant to verify and accept their CET points (most of which were where the CET activities were held late in the cycle);
- seven cases (8%) involved both the registrant not having verified and accepted outstanding CET points as well as a provider not having uploaded confirmation of completion of CET on MyCET (i.e. it related to two or more CET activities); and
- two (2%) related to registrants who decided to swap their points allocation between their specialty and general points in order to meet their requirements.

The above figures mean that in 62 cases (74%) the provider had not confirmed attendance / completion of CET before the end of the cycle in time for the registrant to accept and verify. This created a significant amount of work for the registrant, the GOC and the provider in confirming that the registrant had completed the CET activity/activities.

Of the 18 applications that were rejected, these were because they were not valid disputes. For example, because the registrant was requesting extra time to complete points, or they were disputing they had failed because they had completed the outstanding points in 2019 (i.e. outside the 2016-18 CET cycle), or they were disputing they had failed because they were travelling.

3.2.3 How many registrants applied to be considered under the exceptional circumstances policy and what was the final outcome?

We have a policy which allows registrants to apply for consideration to remain on the register even if they have not met their CET requirements, in the event that they have experienced exceptional circumstances (e.g. circumstances that are unforeseen, and are over and above the course of every day experience which have resulted in them being unable to practise).

We received 108 exceptional circumstances applications from registrants, eight of which were considered void because they had already met their CET requirements and therefore did not need to apply under the policy. In total, 43 (40%) of these applications were accepted and the registrant remained on the register. Figure 54 shows the full outcome of applications considered.

Figure 54: Outcome of exceptional circumstances applications

Exceptional circumstances outcome	Percentage	Number
Accepted – registrant remained on the register	40%	43
Rejected – registrant removed from the register	53%	57
Void – the registrant had met their CET requirements	7%	8
Total	100%	108

Unfortunately we do not have an accessible set of data from the 2013-15 CET cycle in relation to consideration of exceptional circumstances so cannot make comparisons between the two cycles.

3.2.4 How many registrants appealed the decision to remove them from the register and what was the outcome?

Once we had considered all of the disputes and applications for exceptional circumstances, we sent a letter in late February / early March 2019 to the registrants that we intended to remove from the register for not meeting their CET requirements. The letter gave them the opportunity to appeal our decision. Appeals are heard by the Registration Appeals Committee.

We were contacted by 12 registrants who wanted to appeal our decision to remove them from the register for not meeting their CET requirements. Six of these were from registrants where we had refused their application for consideration of exceptional circumstances (one of which was reconsidered and accepted following provision of additional information) and five related to a refusal of a dispute. Figure 55 shows the outcome of the appeals.

Figure 55: Outcome of appeals for 2016-18 CET cycle

Outcome of appeals	Number
Appeal withdrawn by registrant	6
No longer an appealable decision: exceptional circumstances application was reconsidered and accepted following further information about a cancelled CET event (register remains on the register)	1
Possible decision to allow exceptional circumstances application following further information (not yet agreed)	1
Appeal heard by Registration Appeals Committee and dismissed	2
Appeal heard by Registration Appeals Committee and upheld (registrant not removed for not completing CET requirements)	2
Total	12

Of the two cases that were upheld ('upheld' means that the registrant's appeal was successful and they were not removed for not completing their CET requirements) by the Registration Appeals Committee, these were considered under our exceptional circumstances policy and a different decision was made to that originally made by the Registrar based on additional information available to the committee. In one case the registrant remained on the register but in the other case the registrant had not submitted their renewal application and so was removed from the register.

At the end of the 2013-15 CET cycle there were nine appeals relating to notification of removal from the register for not completing CET requirements. There has therefore been an increase in the number of appeals (33%), although the numbers overall are small. Of the nine appeals in the 2013-15 CET cycle, one was withdrawn, four were dismissed and four were upheld.

3.2.5 How many registrants were removed from the register in April 2019 following the outcomes of the disputes and exceptional circumstances process?

In April 2019, we removed 392 registrants from the register for not meeting their CET requirements. This equated to 0.02% of the register. These figures include those who had told us that they wished to retire or withdraw from the register.

3.2.6 How many registrants restore after being removed from the register at the end of the cycle and how long does it take them? How does this compare with the previous cycle?

Given that registrants were only removed from the register in early April 2019, it is too early to give an accurate figure as to how many registrants restore after being removed from the register. This is an area for us to consider later in the year.

3.3 Reflective practice

3.3.1 How many registrants used the personal development plan and how does this compare to the last cycle?

In the 2016-18 CET cycle, the MyCET system required all registrants to complete a personal development plan, which included a scope of practice questionnaire intended to prompt thinking about the context of their own practice, their learning needs and other areas of interest for future development. It also required registrants to read our new *Standards of Practice for Optometrists and Dispensing Opticians* and agree to a learning goal related to the standards. Registrants had to complete these steps before being allowed access to their personal CET records. As such, we found that 100% of registrants had used the personal development plan.

Using the personal development plan on MyCET was not linked to accessing registrants' personal CET records in the 2013-15 CET cycle. In addition, we limited data to analyse this area. However, we found that of the 21,185 active registrants and 460 active restorers ('restorers' are registrants who are not currently on the register, but were previously and are completing CET in order to get back on the register) at the end of the 2013-15 CET cycle:

- 8,816 (41%) had added at least one CET activity to their personal development plan;
- 220 (1%) had added 'activities' to their personal development plan;
- 520 (2%) had a 'saved search' in their personal development plan; and
- 1,055 (5%) had done enough work within the personal development plan to at least edit the default title or to create a second entry in the list.

3.3.2 How many registrants created additional learning goals?

In the 2016-18 CET cycle, registrants were provided with a set learning goal, which was *'to better understand the changes to the Standards of Practice'*. There was no requirement for registrants to develop any other learning goal than the one we had set for them, although they had the ability to do so and this was encouraged through our guidance. Each CET activity verified by a registrant had to be added to a learning goal.

We found that 80% of registrants had created additional learning goals in MyCET. Figure 56 shows the breakdown by registrant group.

Figure 56: Number and percentage of registrants who created additional learning goals by registrant group

Registrant group	Percentage of registrants	Number of registrants
Optometrists	81%	12,272
Dispensing opticians	75%	4,285
Contact lens opticians	76%	946
Therapeutic prescribers	84%	646
Total of all registrants	80%	18,149

We found that registrants logged more than 150,000 CET activities under a learning goal that they had created. Figure 57 shows the range of numbers of learning goals created broken down by registrant group, with 53% of all registrants creating two to six and 27% creating seven or more. The highest number of goals created (by an optometrist) was 94. Figure 58 shows a line graph by registrant group for those that had created between 1 and 16 goals (any numbers above this were too small to show up on the graph so have not been included).

Figure 57: Number of learning goals created by percentage of registrants (by registrant group)

Registrant group	Number of learning goals				Maximum number
	1 (set goal only)	2-6	7-10	11+ ⁸	
Optometrists	18%	51%	19%	12%	94
Dispensing opticians	25%	56%	14%	5%	38
Contact lens opticians	24%	57%	12%	7%	59
Therapeutic prescribers	16%	46%	23%	15%	71
Average of all registrants	21%	53%	17%	10%	-

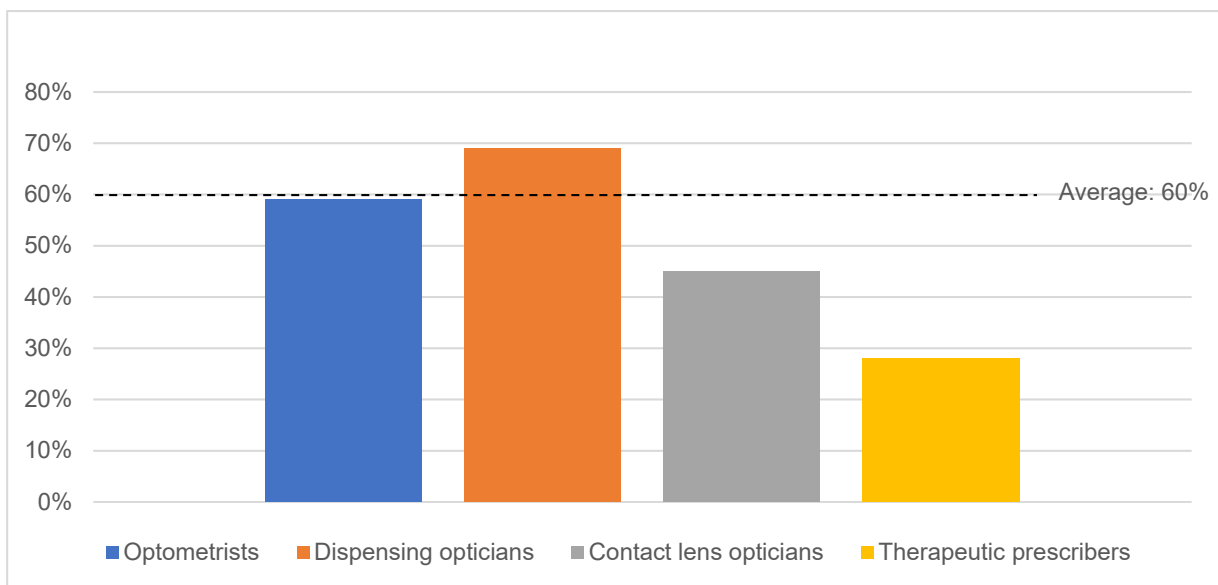
⁸ Where more than ten learning goals were created, it is assumed that the registrant created one learning goal for each CET activity undertaken.

found that 130,205 post-CET reflection statements had been recorded that were not related to peer review. These statements were recorded by 60% of registrants, with dispensing opticians being significantly more likely to do so. Figures 60 and 61 show the breakdown by registrant group.

Figure 60: Number and percentage of completion of post-CET reflection statements (not related to peer review) by registrant group

Registrant group	Percentage of registrants	Number of registrants
Optometrists	59%	8,972
Dispensing opticians	69%	3,960
Contact lens opticians	45%	564
Therapeutic prescribers	28%	213
Average of all registrants	60%	13,709

Figure 61: Percentage of completion of post-CET reflection statements (not related to peer review) by registrant group

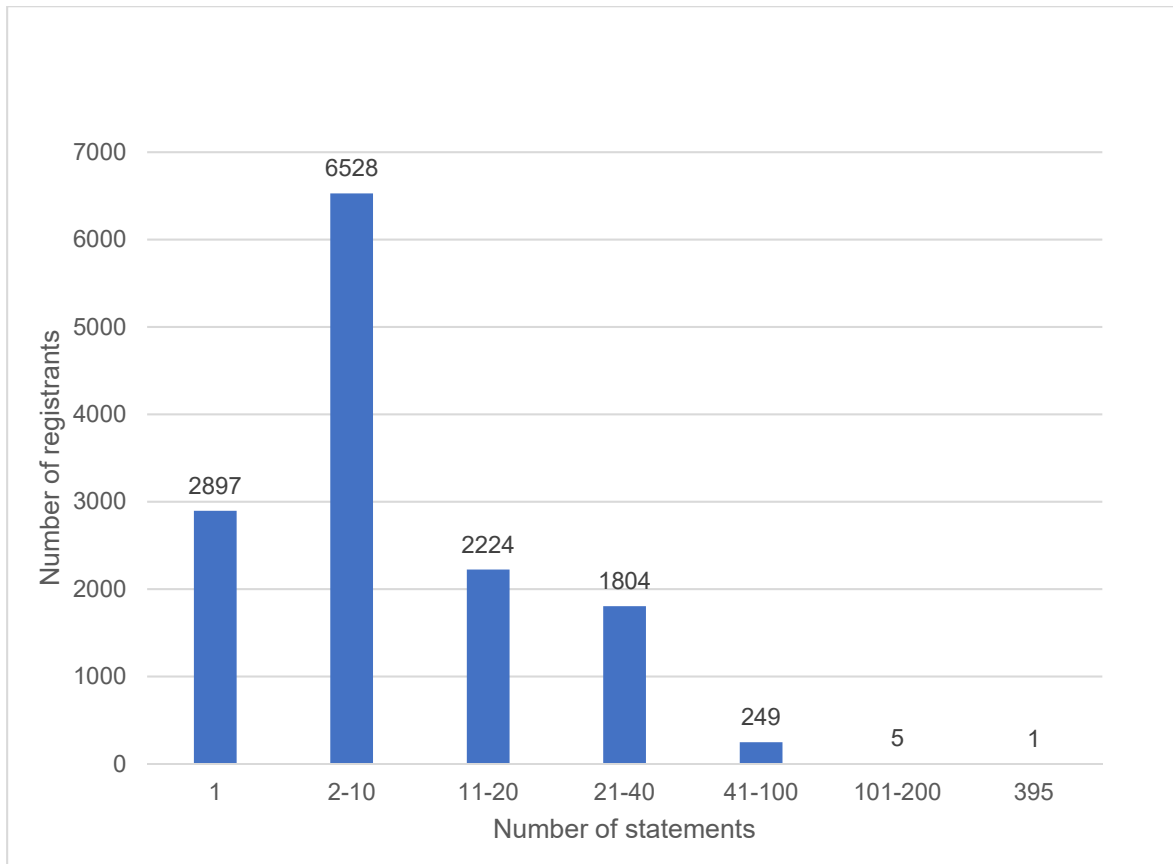


Of registrants that had used the post-CET reflection statements:

- 10,000 had made more than one post-CET reflection statement;
- 6,400 had made more than five post-CET reflection statements; and
- one had made 395 post-CET reflection statements.

Figure 62 shows the results in a graph.

Figure 62: Number of registrants completing post-CET reflection statements (not related to peer review)



We considered whether the number of points awarded to a CET activity would affect the likelihood of the person reflecting on it, the assumption being that the higher the number of points awarded the more likely the registrant might be to reflect upon it. However, we found that the number of CET points awarded does not seem to affect the likelihood of the registrant completing a post-CET reflection statement, as more than two-thirds (94,226) of the voluntary post-CET reflection statements were completed for CET that was only worth one point (see figure 63).

Figure 63: Voluntary post-CET reflection statements by number of CET points awarded

Number of CET points	Number of post-CET reflection statements
1	94,226
2	6,453
3	29,358
6	78
9	32
12	11
18	1
24	46
Total	130,205

3.3.4 Did registrants plan their CET in advance as part of their personal development plan?

We are not able to answer this question as we do not track this data – we feel that it would be intrusive to analyse such data in our role as a regulator, particularly in light of the Williams Review (2018)⁹ which recommended that reflective material is not used when investigating fitness to practise cases, to *“help ensure healthcare professionals are not afraid to use their notes for open, honest reflection which supports improvements in patient care”*.

3.3.5 How many registrants used MyCET to log non-CET activities?

Non-CET activities are activities that could be considered part of continuing professional development but have not been formally approved as CET and therefore do not count towards CET requirements. We found that 1,502 non-CET activities had been added to the personal development plan by 899 registrants (4% of the register).

⁹ Williams, N. (2018) *Gross negligence manslaughter in healthcare: The report of a rapid policy review* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/717946/Williams_Report.pdf

3.4 Effectiveness of CET approval process

3.4.1 Did the interventions we made to the management of approvals improve the consistency of approval decisions?

In 2016, the following changes were made to the CET approvals process:

- improvements to the way that we monitored the performance of our approvers¹⁰ including the feedback process to approvers;
- implementation of annual training for approvers which encouraged requesting further information from CET providers regarding their CET approval applications where there was some uncertainty, rather than outright rejection of the application;
- production of a CET provider system user guide;
- clarification of online learning modalities (types of CET) in the underpinning *CET Principles and Requirements* document; and
- regular e-bulletins for approvers and providers for approvers and providers to help them to understand more about CET and how the cycle was progressing.

In order to answer the question of whether our interventions have improved the consistency of approval decisions, we have looked at:

- the rate of appeals¹¹ across the 2013-15 and 2016-18 CET cycles; and
- requests for further information by approvers following training days.

By way of context, we considered 11,330 CET approval applications in the 2016-18 CET cycle of which 88% were approved and 12% rejected. In the 2013-15 cycle there were 11,885 CET approval applications, of which 90% were approved and 10% rejected.

Rate of appeals

We found that the number of appeals had been increasing throughout the 2013-15 and then significantly decreased across the 2016-18 cycle (see figure 64) back to the total number in 2013. The number of appeals in the last year of the 2016-18 cycle was 48% of the total number in the first year of the cycle. We cannot be sure that the decrease was as a result of our interventions with approvers, as it is also possible that providers improved the quality of their original applications (possibly due to our clarification in the *CET Principles and Requirements* document and our e-bulletin to providers), but it is likely that our interventions contributed to this.

¹⁰ Approvers review a CET submission on the MyCET system against a set of criteria and makes a decision about whether to approve, not approve ('reject') or request further information.

¹¹ Appeals are where a provider has disputed the outcome of the decision made to refuse their application for CET. This process takes place through the MyCET system.

Figure 64: Number of appeals by year and cycle

Year	Number of appeals	Total in cycle	Percentage of CET approval applications
2013	53	2013-2015: 227	2013-15: 2%
2014	74		
2015	100		
2016	104	2016-18: 223	2016-18: 2%
2017	69		
2018	50		

The appeals in the 2016-18 cycle were reviewed by the Chair of CET Approvers. Figure 65 shows that in 74% of cases, the appeals were successful (with the CET subsequently being approved), often after a request for further information.

Figure 65: Outcome of CET decision appeals in 2016-18 CET cycle

Action taken	Percentage of appeals	Number of appeals
Incomplete (requested further information but not forthcoming so original decision stands)	4%	9
Agreed with the appeal and approved the CET (i.e. changed the approver's original decision to reject, often after a request for additional information)	74%	165
Rejected the appeal (either left approval status as it was or took further action to reject approval)	22%	49
Total	100%	223

Requests for further information by approvers

We analysed the data for the number of requests by approvers for further information throughout the cycle, particularly in the months following the approver training days. While there did appear to be some increase in requests for information in the months following the training days, this was not consistent and dropped back down soon after with only a small variation across each year of the cycle. What we do know is that there were 30% more requests for information made in the final year of the 2016-18 cycle than in the first year of the cycle (see figure 66), so it is likely that overall our intervention to ask approvers to request more information before rejected CET did decrease the rejection rate.

Figure 66: Number and percentage of requests for further information following CET approval applications in 2016-18 CET cycle

Year	Total number of CET approval applications	Percentage of submissions where further information was requested	Number of requests for further information
2016	4,438	20%	893
2017	3,328	24%	811
2018	3,564	26%	930
Total	11,330	23%	2,634

3.4.2 Did the extension of the approval process have any effect on the number of approvals between this cycle and the last cycle?

In the 2013-15 CET cycle, any CET activities approved during the cycle were valid for only one year. In the 2016-18 CET cycle, CET activities approved during the cycle were valid until the end of the cycle, the intention being to reduce bureaucracy for CET providers. We compared the number of application from CET providers for approval of CET activities between the two cycles and found that there was a 10% reduction in the total number of approvals (see figure 67). This suggests that our intervention made a difference. However, this reduction was not as significant as we had anticipated and there is still a large volume of CET being submitted which suggests that providers are continuing to deliver new CET on a regular basis.

Figure 67: Number of approvals compared across the 2013-15 and 2016-18 CET cycles

CET cycle	Standard approvals	Fast-track approvals	Total approvals
2013-15	11,885	273	12,158
2016-18	10,770	246	11,016 ¹²

3.4.3 How did the GOC perform in meeting its timeliness targets for approving CET?

We have a target of ten working days to make an approval decision on standard applications from CET providers, as well as applications from registrants for registrant-led peer review and CPD delivered outside the UK (referred to as 'non-UK CPD' below). Where a provider is asked for further information, they have ten working days to respond to the request (if it is not forthcoming within the ten working days, the application is automatically rejected), after which the we have three working days in which to accept or reject the CET application. Where a provider has paid a fee of £295 to access a fast-track approval process, our approval decisions

¹² This figure is different to the total number of CET approval applications in 3.4.1 because this figure uses CET that has been paid for in the cycle (some CET approved in 2018 was not paid for until 2019).

are to be completed within three working days. Figure 68 below shows our overall performance across the cycle was 91% when calculated using the total number of approvals responded to within the time target.

Registrant-led peer reviews were carried out by our executive team rather than our panel of approvers. As of 1 January 2019, these approvals have now been transferred to the Chair and Deputy Chairs of CET Approvers (the two deputy chairs being new roles for 2019), which we hope will improve timeliness.

Figure 68: Percentage of CET approvals carried out within target during the 2016-18 CET cycle

Approval type	Percentage approved within target	Total number of approvals	Total completed within deadline
Standard CET	95%	11,981	11,346
Fast-track CET	94%	289	271
Non-UK CPD	86%	1,838	1,572
Registrant-led peer review	66%	1,446	961
Average across total number of approvals	91%	15,554	14,150

Figure 69 below shows the approvals by month during the three years of the cycle. (It should be noted that in some months there were no fast-track CET applications.) Figures 70-73 show each category of approval including the volume as well as those completed within the time target by month of the cycle.

Figure 69: Percentage of CET approvals carried out within target by month during the 2016-18 CET cycle

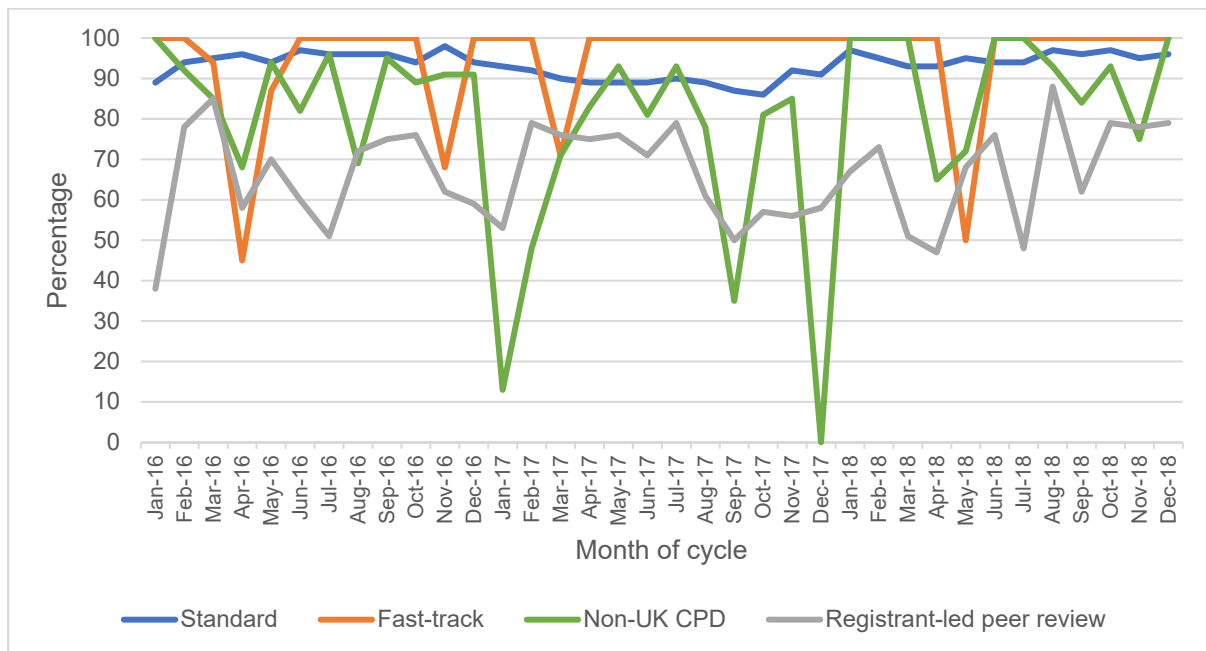


Figure 70: Percentage of standard CET approvals carried out within target by volume and by month during the 2016-18 CET cycle

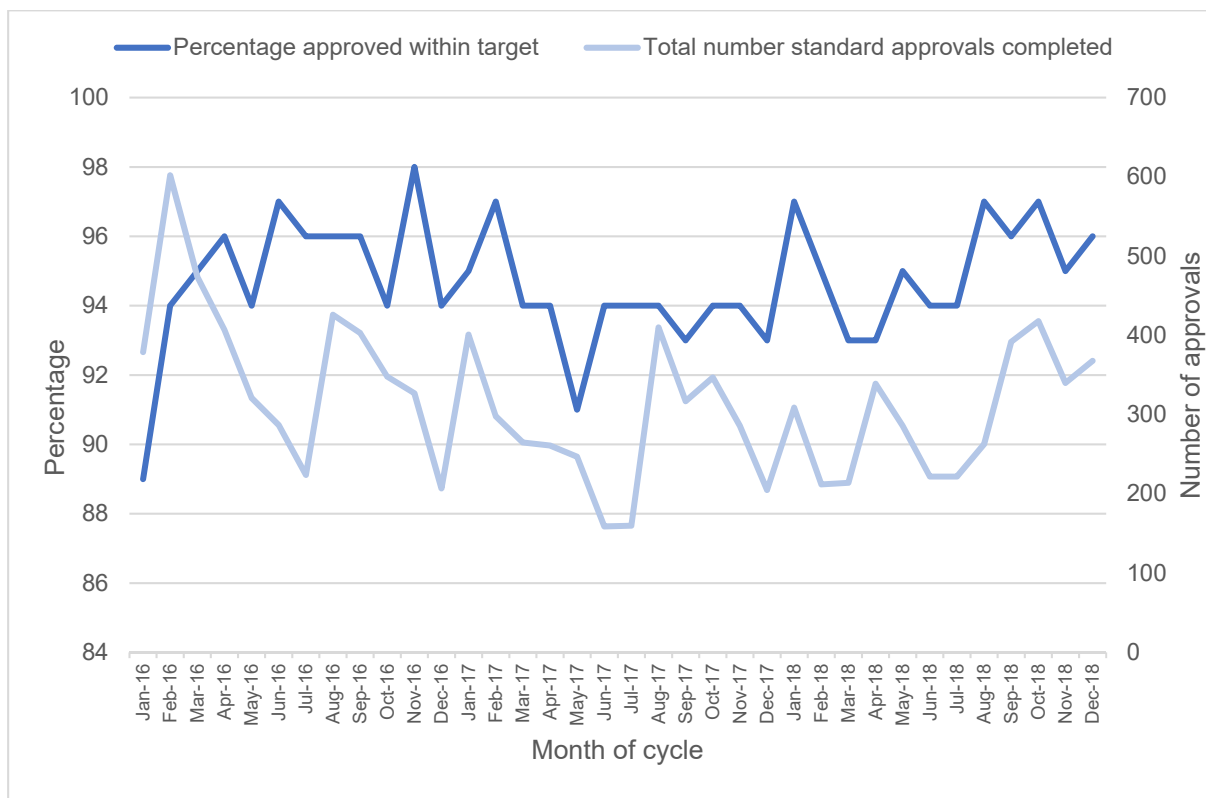


Figure 71: Percentage of fast-track CET approvals carried out within target by volume and by month during the 2016-18 CET cycle

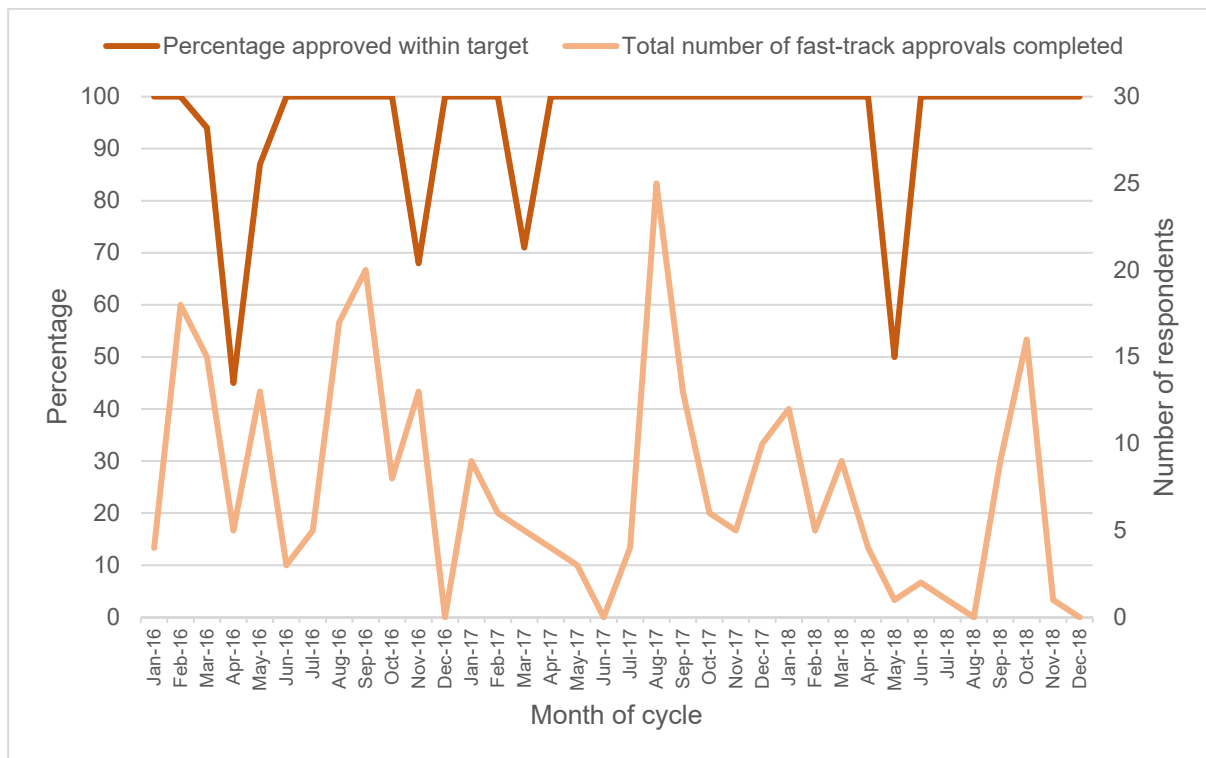


Figure 72: Percentage of non-UK CPD approvals carried out within target by volume and by month during the 2016-18 CET cycle

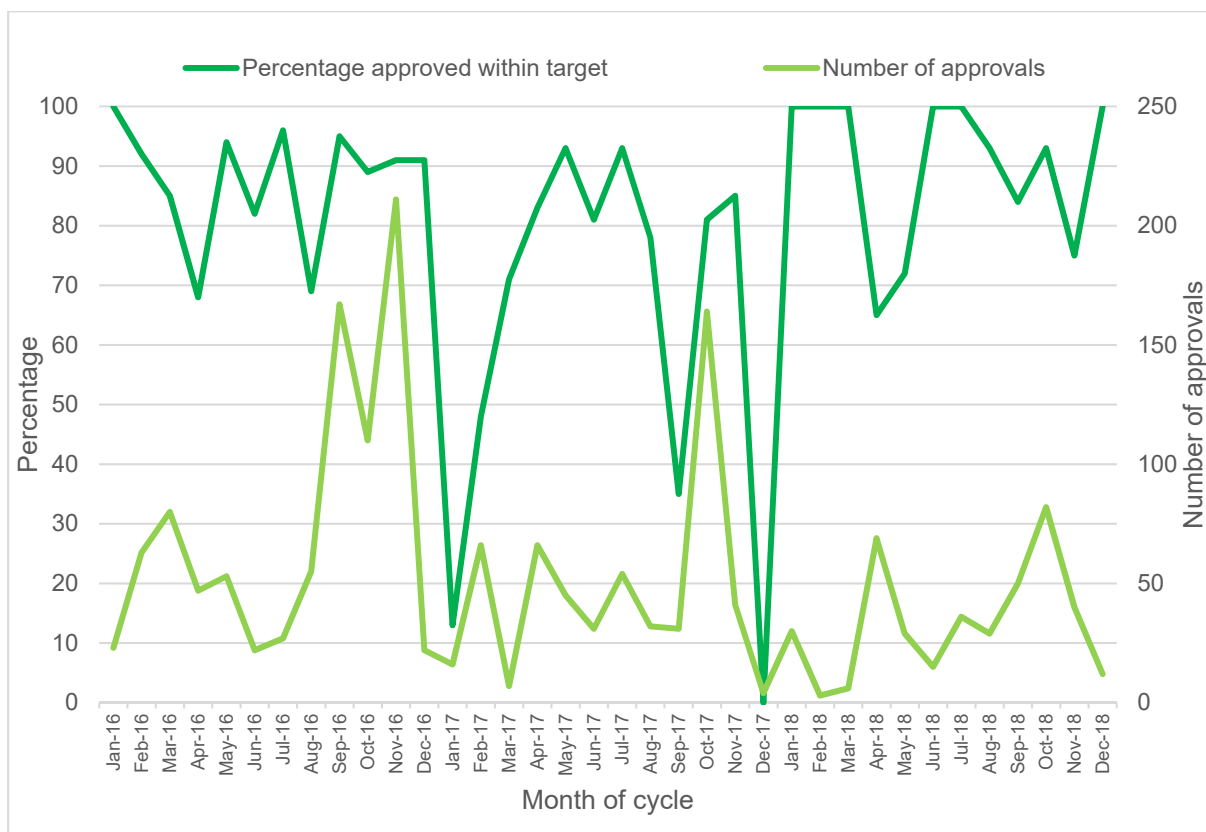
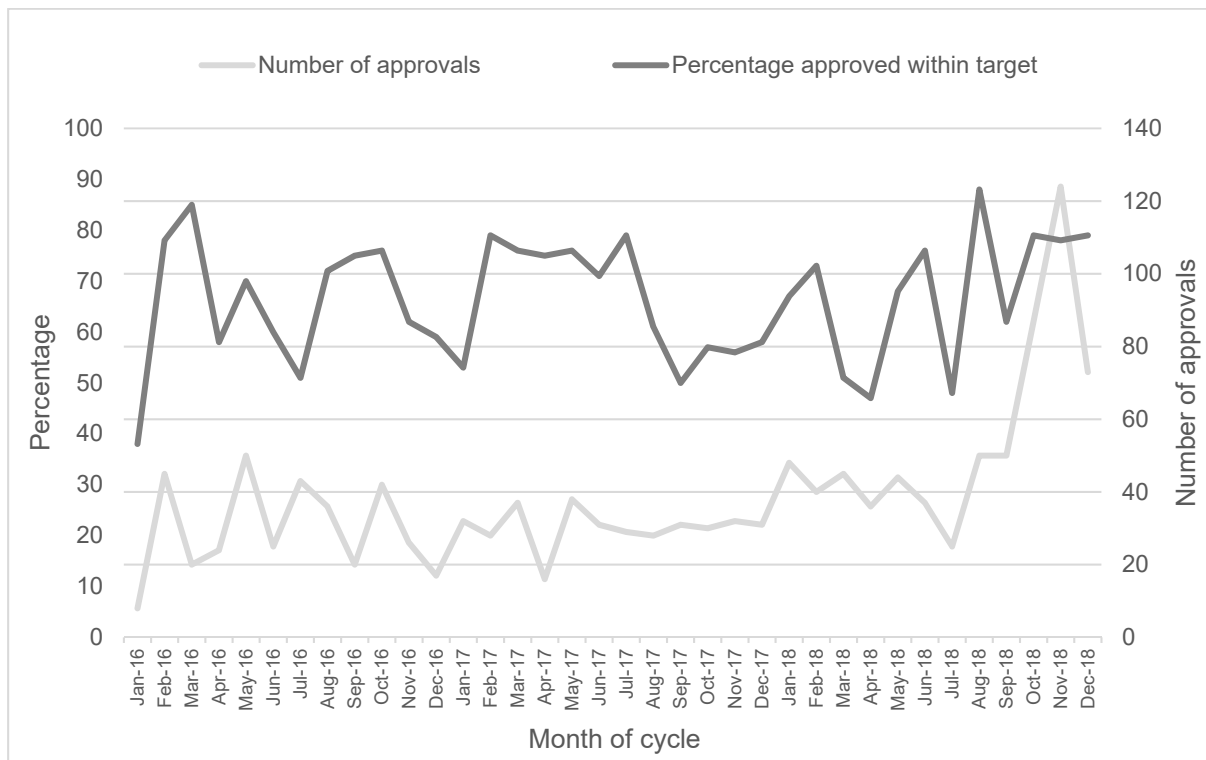


Figure 73: Percentage of registrant-led peer review approvals carried out within target by volume and by month during the 2016-18 CET cycle



3.5 Provider performance

3.5.1 What is the distribution of the performance of providers?

In order to answer this question, we looked at whether providers uploaded confirmation of completion of a CET activity to registrant's MyCET record on time following a CET activity. We also looked at their registrant feedback scores. It is important for providers to upload confirmation within a set time period (usually ten working days but some activities are one month) of a CET activity being attended/completed, so that registrants can log in to MyCET to confirm and verify the completion and separately complete a post-CET reflection statement on how well the training addressed their needs (where required to do so), as well as rating the provider for quality of the activity.

Uploading confirmation of completion of CET activities

Providers are required to upload confirmation of attendance at a CET event in ten working days. We found that 79% of uploads were completed within the deadline (88% were completed with 20 working days).

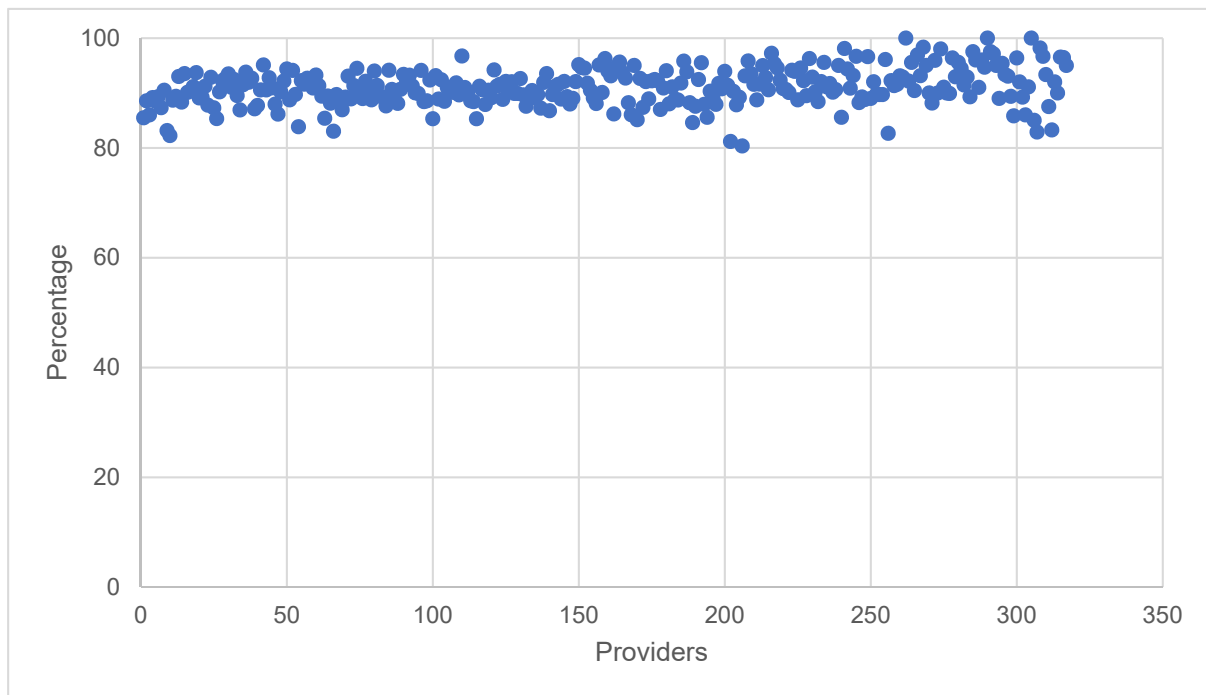
The requirements for upload of confirmation of distance-learning is different to events and does not have a clear deadline in all cases, as it may depend on how long the registrant takes to complete the activity. At this point in time we do not have an accurate figure for the average frequency of uploads. Initial review of the data shows that many providers clearly have a regular pattern to their uploads but the data needs further analysis due to the number of uploads being made and outlying data which can have a disproportionate effect on averages.

Feedback on quality of CET provision

When registrants complete CET activities delivered by CET providers, they have the ability to rate the quality of specific activity and leave comments for the provider. These ratings were 1-5 and they are automatically aggregated on the MyCET system to give an overall rating for a CET activity. All ratings for individual activities delivered by the provider are then aggregated and averaged to give an overall rating for that CET provider. Both of these scores/ratings and the individual comments from attendees are shown on the MyCET record for the provider, so that they can use this information to improve provision. We have turned these scores into a percentage for ease of reference for the purposes of this report (i.e. a score of 5 would be equivalent to 100% and a score of 4 would be 80% etc).

There were 322 providers that delivered CET in the 2016-18 CET cycle (381 were registered on MyCET but not all delivered CET) and the average rating across all providers was 91%. Figure 74 shows that feedback scores were consistently high, the average scores for each provider ranging between 78% and 100%.

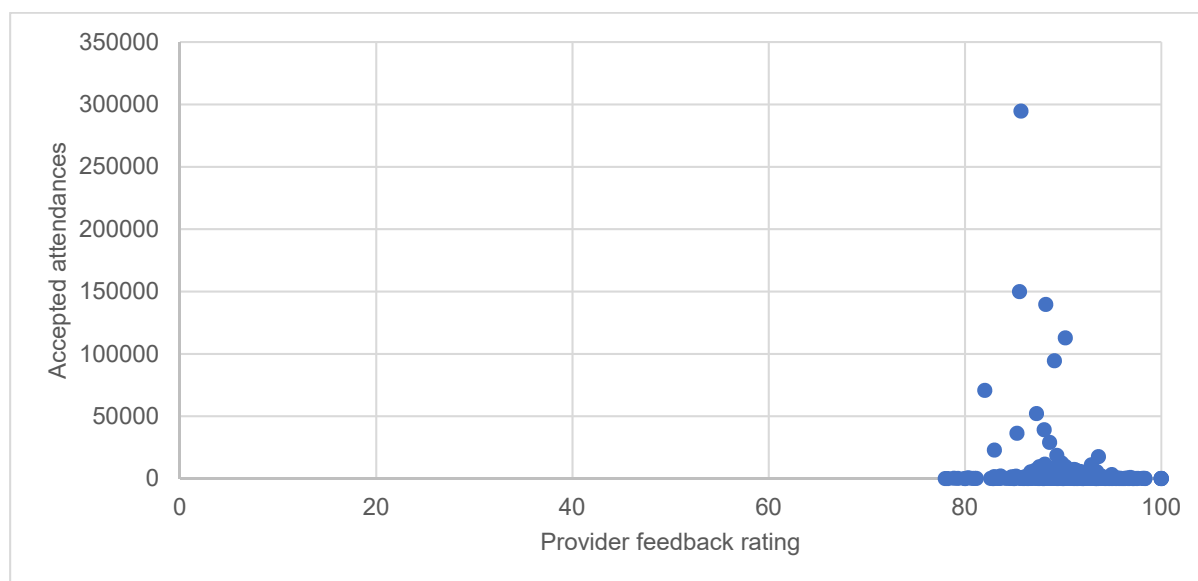
Figure 74: Distribution of provider performance (registrant feedback rating) in the 2016-18 CET cycle



3.5.2 Is there a connection between the volume of CET and provider rating?

We looked at the data for providers based on number of accepted CET attendances to see if there was any link between the amount of CET activities that a provider provides and their feedback scores. Figure 75 provides the volume of CET by provider rating, which does not show a link between the volume of CET and provider rating.

Figure 75: Distribution of provider performance (registrant feedback rating) by volume of CET in the 2016-18 CET cycle



We also looked at the largest and smallest ten providers based on the number of CET points awarded to registrants and compared these against the number of registrants that attended, the number of verified and accepted points, average feedback rating and average time to upload confirmation of completion of CET on MyCET. Figures 76 and 77 show that there was no significant difference in the feedback ratings, with the ten providers awarding the highest number of CET points having ratings between 86 and 90% and the ten providers awarded the lowest number of CET points having ratings between 83 and 92%. (NB The data in figures 76 and 77 below excludes visual recognition tests, multi-part CET over time and 'other' CET, as for these types of CET activities the providers often set long event periods and upload before the event end date, which would distort the picture.)

Figure 76: Ten providers by highest number of CET points awarded, rating by registrant and average time to upload confirmation of completion of CET (calendar days)

Provider	Total CET points awarded to registrants	Number of CET activities run	Total number of registrants	Number of registrants that verified and accepted points	Average feedback rating	Average time to upload confirmation of completion of CET
1	152,610	1,154	84,630	80,843	88%	4
2	139,469	788	122,364	120,325	86%	9
3	110,360	810	71,657	70,721	86%	8
4	96,648	624	87,421	83,215	90%	10
5	53,702	872	41,220	40,968	89%	4
6	49,738	401	32,306	31,335	88%	10
7	40,878	637	33,878	32,784	88%	8
8	30,223	649	14,758	14,117	88%	6

Provider	Total CET points awarded to registrants	Number of CET activities run	Total number of registrants	Number of registrants that verified and accepted points	Average feedback rating	Average time to upload confirmation of completion of CET
9	30,185	97	26,614	25,709	87%	27 (DL ¹³)
10	26,259	504	10,650	10,199	89%	6 (126 DL)

Figure 77: Ten providers by lowest number of CET points awarded, rating by registrant and average time to upload confirmation of completion of CET (calendar days)

Provider	Total CET points awarded to registrants	Number of CET activities run	Total number of registrants	Number of registrants that verified and accepted points	Average feedback rating	Average time to upload confirmation of completion of CET
1	6	2	4	6	87%	17
2	6	1	6	6	83%	1
3	8	1	8	5	91%	5
4	8	5	8	8	96%	4
5	8	1	8	8	85%	6
6	9	3	9	9	91%	14
7	9	1	3	4	89%	2
8	9	2	9	7	83%	5
9	10	2	5	5	92%	5
10	10	1	10	10	92%	34

3.5.3 How many individual activities are approved for each provider? How many times has each individual activity been delivered?

There were 322 providers that delivered CET activities during the 2016-18 CET cycle, providing a total of 16,195 CET activities (these figures include the total number of times ('sessions') a CET activity was delivered, which may have been events requiring physical attendance or distance-learning).

We looked at the volume of CET activities that were delivered in the 2016-18 CET cycle and found that 69% of CET activities were delivered once, 12% were delivered twice and the remainder were delivered three times or more (see figure 78). The highest number of times a piece of CET was delivered was 252. The data in figure 78 below excludes those activities approved under the 'other' modality in MyCET.

¹³ DL means the figure relates to distance-learning activities only.

Figure 78: Number of times CET activities were delivered across the cycle

Number of times delivered	Number of CET activities	Percentage of total number of CET activities
1	4,663	69%
2	786	12%
3	488	7%
4 - 90	812	12%
143 - 252	3	0%

3.5.4 What impact did providers have on the ability of registrants to meet their requirements (e.g. those providers who offered CET very late in the cycle but were unable to upload confirmation of completion of CET in time for the registrant to verify and accept their CET points)? What percentage of disputes related to providers not uploading confirmation in time for the registrant to verify and accept their CET points?

Over the three years of the cycle, providers provided sufficient CET for 97% of registrants to meet their CET requirements across a range of types of CET.

However, there were 51 CET events held between 23-31 December 2018 by five providers, which were attended by a total of 34 registrants and 62 points were awarded. There were 37 events in the last week of the cycle where confirmation of completion of CET was not uploaded to MyCET before the end of the cycle. This would have meant that registrants who had not yet met their CET requirements at that stage would not have been able to verify and accept their CET points in time to meet their CET requirements by the end of the cycle.

As outlined in section 3.2.2, we accepted 84 disputes of which 62 (74%) involved the provider not having uploaded confirmation of completion of CET on MyCET in time for the registrant to accept them before the end of the cycle (in seven of these cases, the registrant had also not verified and accepted some of their outstanding CET points in relation to one or more other CET activities).

3.6 Availability and accessibility of CET

3.6.1 What CET was available and accessible to registrants?

In the 2016-18 CET cycle, 16,195 CET activities¹⁴ were available to registrants broken down as follows:

- 13,257 events (requiring physical attendance);
- 2,688 distance-learning activities; and
- 250 activities applied for under the 'other' modality which could be either events or distance-learning activities.

For information, the analysis below excludes CET activities applied for under the 'other' modality as these can be either events or distance-learning, so it is not possible to distinguish between the two. The 250 'other' CET activities awarded a total of 16,439 CET points.

Location

The events were spread over 900 locations across 11 regions. Figure 79 shows the number of events by region and figure 80 shows the 20 locations where the highest number of events were run, with a significantly higher number of events being run in London and Birmingham.

Figure 79: Number of CET events delivered by region

Location	Number of events
East Midlands	832
North East	706
North West	947
Northern Ireland	276
Other location	655
Scotland	1,326
South Central	621
South East	4,633
South West	827
Wales	588
West Midlands	1,764
No region given	82
Total	13,257

¹⁴CET activities in this context refer to every piece of CET approved and delivered (a CET session) to registrants throughout the cycle i.e. a lecture that was run three times.

Figure 80: Top 20 CET locations by number of events delivered

Location	Number of events
London	1,973
Birmingham	1,192
Glasgow	650
Manchester	359
Cardiff	309
Wokingham	276
Bristol	263
Edinburgh	236
Leeds	151
Derby	150
Camberley	129
Nottingham	125
Belfast	119
Ruddington	114
Leicester	112
Cambridge	112
Aberdeen	111
Milton Keynes	110
Plymouth	108
Bradford	105

CET events

Using CET points as an indicator of accessibility and specifically looking at events with physical attendance, registrants used CET events to gain 633,588 CET points. Figure 81 shows which CET events were available to registrants by type of CET. The top three types of events available were lecture, discussion workshop and peer discussion group.

Figure 81: Type of CET events available by number

Type of CET event	Number
Lecture	4,401
Discussion workshop	3,783
Peer discussion group	2,336
Skills workshop	1,281
Lecture with discussion workshop	505
Visual recognition test and discussion	458
Peer review group	219
Demonstration and discussion workshop	93
Optical lab tour	87

Type of CET event	Number
Multi-part CET programme delivered over time	52
Multi-station workshop	42
Total	13,257

Distance-learning activities

Registrants used distance-learning activities to gain 418,705 CET points. Figure 82 shows which types of CET were available in this category. The top three activities available were distance-learning, text-based distance-learning and recorded lectures.

Figure 82: Type of distance-learning CET activities available by number

Type of CET activity	Number
Distance-learning	1,023
Text-based distance-learning	606
Recorded lecture	378
Visual recognition test	211
Interactive visual recognition test	159
Interactive distance-learning and discussion	84
Interactive text-based distance-learning and discussion	82
Online lecture and small group discussion	63
Interactive text-based distance-learning and supervised feedback	51
Interactive distance-learning and supervised feedback	31
Total	2,688

Registrant-led peer reviews

Registrant-led peer reviews were set up by 463 unique registrants (20% of whom were dispensing opticians) who set up 772 groups. These were attended by 4,565 registrants. Registrants gained 13,695 CET points using registrant-led peer reviews (NB this total is included within the number of points mentioned above in relation to CET events).

3.6.2 What are registrants doing CET in and how does this relate to their scope of practice?

We looked at which competencies CET activities had been approved against. It should be noted that CET is often approved against an average of four competencies. The tables in figures 83-86 below show a breakdown by registrant group. Competencies in which the most CET is approved against are:

- optometrists: ocular disease, Standards of Practice and communication;
- dispensing opticians: communication, Standards of Practice and ocular abnormalities;

- contact lens opticians: contact lenses, communication and Standards of Practice; and
- therapeutic prescribers: knowledge, options and safe.

Figure 83: Percentage and number of CET activities approved against each competency - optometrists

Optometrist competency	Percentage approved against competency	Number of CET activities linked to competency
Ocular disease	28%	4,053
Standards of Practice	20%	2,898
Communication	20%	2,846
Ocular examination	12%	1,754
Contact lenses	7%	1,026
Optical appliances	6%	852
Assessment of visual function	5%	660
Binocular vision	4%	524

Figure 84: Percentage and number of CET activities approved against each competency - dispensing opticians

Dispensing optician competency	Percentage approved against competency	Number of CET activities linked to competency
Communication	22%	1,634
Standards of Practice	22%	1,590
Ocular abnormalities	20%	1,446
Optical appliances	10%	699
Ocular examination	8%	557
Contact lenses	6%	472
Refractive management	6%	450
Low vision	4%	270
Paediatric dispensing	3%	232

Figure 85: Percentage and number of CET activities approved against each competency – contact lens opticians

Contact lens optician competency	Percentage approved against competency	Number of CET activities linked to competency
Contact lenses	34%	931
Communication	24%	651
Standards of Practice	19%	525
Ocular examination	19%	524
Verification and identification	3%	91

Figure 86: Percentage and number of CET activities approved against each competency – therapeutic prescribers

Therapeutic prescriber competency	Percentage approved against competency	Number of CET linked to competency
Knowledge	26%	693
Options	25%	652
Safe	12%	302
Share decision making	9%	229
Self and others	8%	213
Professional	6%	145
Always improving	5%	135
Information	5%	134
The healthcare system	5%	128

3.6.3 Are we reliant on certain organisations for the CET scheme to be delivered?

Using the highest number of CET points awarded as an indicative measure, we found that the largest ten providers of CET provide 68% of all CET, with the largest three providers providing 37% of CET (see figure 87). If one of these three were no longer involved, we would lose a maximum of 14% of the supply of CET. The largest ten providers supplied 28% of all CET points.

Figure 87: Largest ten CET providers by number of CET points and percentage of overall CET points

Provider	Percentage of overall CET points	Number of CET points
1	14%	152,610
2	13%	139,469
3	10%	110,360

Provider	Percentage of overall CET points	Number of CET points
4	9%	96,648
5	5%	53,702
6	5%	49,738
7	4%	40,878
8	3%	30,223
9	3%	30,185
10	2%	26,259
Total	68%	730,072

4. Conclusions and lessons learnt

4.1 Completion of CET during the cycle

Our overall conclusion is that the CET scheme has been effective in achieving its aims (outlined in section 2.2 of this report). A significant proportion of registrants are doing more than their minimum CET requirements, with 81% of registrants doing more than the minimum number of CET points required.

Peer review requirements were introduced in 2013 to reduce professional isolation. Peer review was the most likely requirement to be met first during the 2016-18 CET cycle, with 72% of registrants with the requirement completing more than one peer review. In addition, 83% of dispensing opticians had completed at least one peer review even though it was not one of their CET requirements. Over half of dispensing opticians had completed more than one peer review. The vast majority of registrants had also completed their interactive CET requirements, which was also intended to reduce professional isolation. We therefore conclude that the peer review and interactive CET requirements have been successful in reducing professional isolation, with significant numbers of registrants completing more than their minimum requirements and a significant proportion of registrants who do not have that requirement engaging with their peers through peer review.

Another aim of the enhanced CET scheme introduced in 2013 was to act as a scheme of revalidation by introducing competency requirements (specific areas of practice) to ensure that registrants were keeping up to date in all of the knowledge and skills relevant to their registrant group. Given that 97% of registrants in the 2016-18 CET cycle completed their requirements (including coverage of the competencies) and that all registrants had completed a personal development plan, we feel that we have had some success in this area. However, we cannot be completely sure that registrants are completing CET in all areas of their scope of practice – our CET review project is looking at whether our competencies limit registrants in the kind of CET that they complete.

When enhanced CET was introduced in 2013, we set a regulatory expectation that registrants should complete a minimum of six points per year to help ensure their CET was spread across the cycle rather than leaving it until near the end of the cycle to complete most of their requirements. Our findings suggest that we were successful in this area, as the vast majority of registrants are meeting the regulatory expectation to complete six points per year and 60% of them are completing at least 12 points per year.

Just over half (56%) of registrants had completed their CET requirements prior to the last three months of the cycle. Our survey of registrants who had not met their requirements as at 31 October 2018 (the date after which we are legally required to

issue them with a formal letter) revealed that registrants found the interactive points element the most difficult to complete. Those who had not completed their requirements had either booked events for the last two months of the cycle or would have completed their requirements sooner, but personal circumstances had prevented them from doing so. Many of them had just not completed the administrative task of verifying completion of the CET and accepting points through MyCET at this stage, partly because they found it onerous to do so. We have already made some improvements in this area on MyCET in early 2019 so will be reviewing if these have been successful.

We found that 4-5% of registrants would have met their requirements sooner in the last year of the cycle if they had completed this task earlier, meaning that we would not have had to issue 1,100 of the letters that we were required to send to registrants who had not met their CET requirements as at 31 October 2018.

Comments from some registrants in our survey suggested difficulties in finding interactive CET locally or online and the unfairness of dispensing opticians not receiving financial help to attend CET despite having the same requirements as optometrists. There was also some confusion over peer review requirements, possibly around the difference between peer discussion, peer review and discussion workshops.

We found that 73% of registrants continued to log in to MyCET to verify their CET activities after they had achieved their CET requirements. This correlated with the finding that a significant number of registrants are doing more than their minimum CET requirements.

Our communications in the last six months of the cycle to encourage registrants to complete their CET requirements appeared to be successful, with spikes in MyCET activity following the reminders and the majority of registrants responding to our survey recalling our email reminders, which they found to be clear and easy to understand. The main peaks in MyCET activity were in March, November and December, so we will need to consider if this has implications for resourcing requirements in the GOC to support registrants at those times of the year.

We had assumed that registrants who worked in multiples were more likely to complete their CET sooner because of the increased employer support and larger numbers of dedicated CET sessions available, but were surprised to note that registrants who worked for independents were more likely to complete their CET requirements sooner. It is perhaps not surprising that locums generally took longer to meet their CET requirements given that they would not be likely to receive any support from an employer in meeting their requirements. Some registrants completing our survey suggested that better CET resources or more interactive CET for locums would be helpful.

Anecdotal evidence suggested that it may have been more difficult for registrants based outside the UK to complete their requirements. This was not necessarily found to be true as we found that in many months of the cycle, non-UK registrants were completing their requirements sooner than UK registrants, although not for the majority of the cycle. Of the small number of non-UK registrants responding to our survey, 60% found interactive points to be the hardest to complete, which was also the case with UK registrants. Some non-UK registrants responding to our survey found the process of getting activities outside the UK recognised as CET difficult and would like to see a directory of non-UK CET that had already been approved.

4.2 Compliance with CET requirements at end of CET cycle

A very small proportion of the register (1.9%¹⁵ - a similar proportion to the last cycle) did not meet their CET requirements as at 31 December 2018, with 46% of those registrants submitting a dispute or an application for consideration of exceptional circumstances.

A significant number (75%) of the disputes and 40% of the exceptional circumstances applications were accepted, with the registrant remaining on the register. All of the accepted disputes were due either to the registrant not having completed the administrative task of accepting and verifying attendance / completion of CET on MyCET or because the provider had not provided confirmation on MyCET in time for the registrant to accept them, or a combination of both relating to more than one CET activity. We provided registrants with numerous reminders (in the last six months of the cycle in particular) that they needed to accept and verify their CET, so this may relate to our earlier finding that some registrants find it onerous to accept CET points, albeit the number of cases was a very small proportion of the total number of registrants (as mentioned in section 4.1 above, we have already made some improvements in this area on MyCET in early 2019 so will be reviewing if these have been successful).

We recognise that some CET providers held CET in December 2018 to help registrants to meet their requirements. Unfortunately, some of those providers were then not able to upload confirmation of completion of CET in time for registrants to accept them during the cycle. We will need to consider how to address this issue.

Twelve registrants appealed the final decision to remove them from the register, a slight increase on the previous CET cycle where nine registrants appealed. As the numbers are small, we do not consider this significant. We will continue to review the outcome of the appeals and incorporate the learning as part of our review of CET.

¹⁵ This figure does not include those registrants who had already informed us that they wished to retire or withdraw from the register.

4.3 Reflective practice

Registrants are using the reflective practice tools on MyCET even where they are not required to do so, with 80% of registrants creating additional learning goals and 60% using reflection statements for activities other than peer review. A small proportion of registrants (4%) are also using MyCET to record non-CET activities, with 1,502 activities recorded. We are pleased to see that registrants are using these tools and are keen for more of them to do so in the 2019-21 CET cycle. We will continue to look at this area as part of our project to review CET.

4.4 Effectiveness of CET approval process

We consider that our approval process has been effective in ensuring that CET is available to our registrants. The number of CET approval applications has decreased by 10% since the last CET cycle, which may be due to the decision in the 2016-18 cycle for CET to be approved for the full cycle, rather than just one year. This will likely have led to a saving in resources and costs for both providers and the GOC, although this was not as significant a decrease as we anticipated. There is still a large volume of CET being submitted which suggests that providers are continuing to deliver new CET on a regular basis.

Our approvers have significantly increased the number of occasions where they request further information before rejecting a CET approval application, which may be due to the annual training that we started in 2016. The total number of appeals for rejected CET has remained level across the last two cycles, but the number has significantly reduced between the last year of the 2013-15 CET cycle and the last year of the 2016-18 CET cycle, which could be as a result of our approver training.

Our performance in responding to CET approval applications within our time targets is high at an average of 91% across the total number of approvals, with our timeliness significantly higher for standard and fast-track approvals than for non-UK CPD and registrant-led peer review (although it should be noted that the volume of standard and fast-track approvals we receive is significantly higher). We have already made some changes to the way in which we approve registrant-led peer review in the 2019-21 CET cycle and will continue to look at ways in which we can improve performance further.

4.5 Provider performance

Providers are consistently performing well, with 79% of the 322 providers uploading the confirmation of completion of CET events on MyCET within the agreed timescales. We do not have a clear set of data in relation to performance against distance-learning activities, so this will require further investigation. The quality

measure of aggregated registrant feedback scores also remains high at 91% on average with a small range between 78-100%.

4.6 Availability and accessibility of CET

With over 1,000,000 CET points awarded and over 16,000 CET activities available to registrants during the 2016-18 CET cycle, we consider that there was sufficient CET available for registrants to complete their requirements (although CET providers may wish to consider whether they wish to provide any more CET in the competency areas in which the smallest amount of CET is available). Of these activities, 83% were events requiring physical attendance and 17% were distance-learning (discounting the CET activities approved under the 'other' modality). The events were spread out over a significant number of locations across the UK, the largest number in London and Birmingham, with lectures, discussion workshops and peer discussion groups being the most widely available.

There were 50% more points gained from events requiring physical attendance (633,588 awarded) than through distance-learning activities (418,705 awarded). We may wish to monitor whether this changes over time as new technology develops.

Over four and a half thousand registrants arranged over 750 registrant-led peer reviews, which is a significant contribution to the overall ability of registrants to meet their peer review requirement. These may be more accessible to certain types of registrants, for example, those who are based in a rural location or those for whom it may be easier to carry out CET with colleagues in their practice.

The ten largest CET providers provide 68% of CET, with the largest three providers providing 37% of CET, meaning that the CET system is heavily reliant on a small number of providers.

5. Recommendations

As part of our project to review CET, we will consider the recommendations set out in each of the sections below.

5.1 Completion of CET during the cycle

Recommendation 1: Work with CET providers to encourage more local and online interactive CET.

Recommendation 2: Review if the changes made to MyCET in early 2019 to make it easier to use (including the process for verifying and accepting CET) have been successful – consider whether a ‘mobile app’ can be developed.

Recommendation 3: Work with CET providers to produce CET resources for locums.

Recommendation 4: When considering future CET policy, take into account that dispensing opticians do not receive the same funding for CET as optometrists.

Recommendation 5: Confirm requirements for peer review and ensure the way that we explain them is clear (so that registrants do not confuse them with discussion workshops).

Recommendation 6: Consider a fuller communications strategy across the full three years of the 2019-21 CET cycle (including encouraging registrants to regularly verify and accept their points), as well as continuing similar communications in the final six months to remind registrants to complete their CET requirements.

Recommendation 7: Discuss with employers why registrants working in multiples are likely to complete their CET requirements less quickly than those working in independents and whether any further support for those registrants is required (could also explore this using our registrant survey).

Recommendation 8: Review the process for recognising activities outside the UK as CET to ensure accessibility and that it does not create a barrier to meeting requirements.

5.2 Compliance with CET requirements at end of CET cycle

Recommendation 9: Explore with providers that hold CET activities late in the cycle how they can ensure that they upload confirmation of completion of CET on MyCET in time for registrants to verify and accept their CET points by the end of the cycle.

Recommendation 10: In early 2020, as part of additional CET evaluation work, consider how many registrants restore after being removed from the register at the end of the cycle and how long it takes them to restore to the register.

5.3 Reflective practice

Recommendation 11: Continue to review our reflective practice tools as part of our project to review CET.

5.4 Effectiveness of CET approval process

Recommendation 12: Continue to validate CET approval applications for the full cycle.

Recommendation 13: Continue to deliver training to approvers to ensure that information is requested prior to rejection of a CET approval application and to improve consistency of decisions.

Recommendation 14: Consider how we can further improve our response rates to CET approval applications (particularly non-UK CPD and registrant-led peer reviews) within our time targets for approvals.

5.5 Provider performance

Recommendation 15: Continue to work with providers to encourage timely uploading of confirmation of completion of CET on MyCET.

Recommendation 16: Further examine the data in relation to provider performance in uploading confirmation of completion of CET in a timely manner for distance-learning activities.

5.6 Availability and accessibility of CET

Recommendation 17: Consider questions on the availability and accessibility of CET in our registrant survey.

Recommendation 18: Consider monitoring whether the proportion of CET points awarded to physical events or distance-learning activities changes over time as new technology develops.

5.7 Overall

Recommendation 19: Consider further analysis of the registrant data based on registrant profile such as age, sex and ethnicity where these are available in order to inform future CET policy.