

General Optical Council

Guide to audit of providers of CPD



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Introduction

About this guide

Continuing professional development (CPD) is a statutory requirement for all fully-qualified optometrists and dispensing opticians to ensure they keep their skills up-to-date and develop new ones in order to practise safely and protect their patients.

CPD providers hold a privileged position in terms of delivering learning to registrants. They must meet the Standards for CPD providers (featured in annex 2 of our Guidance for providers of CPD) and ensure that the CPD they deliver is of good quality and relevant for registrants.

This guide explains the audit process for providers of CPD and aims to help you understand what is involved.

Why does the GOC need to undertake an audit of approved CPD providers and their CPD provision?

We need to undertake audit as a form of quality assurance. For providers, it is to make sure the learning they provide to registrants is of good quality and that they are meeting the Standards for CPD providers (annex 2 of our [Guidance for providers of CPD](#)). Audit is intended to be a positive process where, if issues are identified, providers are supported to work on them.

Audit has been introduced from the 2022-24 CPD cycle to provide a mechanism of quality assurance that was not required under the previous Continuing Education and Training (CET) scheme, which required advance approval of learning events and for providers to allocate points to registrants. As the CPD scheme is much more flexible than the CET scheme was, audit is a proportionate way of quality assuring CPD provision without the heavy administrative burden of advance approval.

When will audit take place?

Audit will take place annually, staggered throughout the year. The audit year runs from January to December, in line with each calendar year within the CPD cycle.

How are CPD providers selected for audit?

Up to ten percent of CPD providers will be audited each calendar year. We may also audit providers flagged to us 'of concern' in a targeted audit.

Can all CPD providers be audited?

No, we will not audit providers holding 'provisional' status. This is because we approve their CPD in advance and therefore audit is not needed as a safeguard.

How will I know if I have been selected for audit?

We will email the primary contact for the CPD provider account to confirm that the provider has been selected for audit. We will be in contact again to notify when the audit is complete and include any advice or comments from the auditor. We may also contact you before audit is complete if we need further information or clarification from you in order to complete the audit.

Can I opt out of audit?

No, a provider cannot opt out of audit. Being able to audit provider records is a crucial part of our being able to undertake appropriate quality assurance and be satisfied that our registrants have access to good quality learning that will help them to practise safely.

Who will audit CPD provider records?

Audit is undertaken by our CPD auditors. The auditors are optometrists and dispensing opticians appointed and trained by the GOC.

As part of the audit process, you may also have contact with members of the GOC CPD team, who are our expert in-house staff. You are welcome to contact them with questions at any stage of the audit.

What do I need to provide for audit to be undertaken?

You will not usually need to provide anything – audit is undertaken by looking at your records on the GOC CPD provider account platform. It is therefore very important that you make sure your records of CPD provision are as clear and complete as they can be, in accordance with your responsibilities under the Standards for CPD providers (annex 2 of our [Guidance for providers of CPD](#)). Section 3 of the Guidance for providers of CPD, 'Developing CPD content,' sets out the information that providers should retain.

In some circumstances, the auditor may require more information from you. If this is the case, they will let you know during the audit. This will usually be if the information recorded in your GOC provider account was not clear or complete, or if there is a discrepancy.

Can an auditor revoke CPD that has already been delivered?

No, auditors cannot revoke CPD that has already been delivered and they cannot remove points from registrants. Registrants complete CPD with approved providers in good faith that the provider meets the Standards for CPD providers and that the learning they provide is of good quality. Registrants are required to provide feedback via MyCPD on all CPD that they complete from approved providers. Providers should regularly review and act upon this feedback in accordance with the Standards for CPD providers.

Complaints about the quality of CPD provision or provider account administration may be triggers for a targeted audit.

Where do I go if I have questions about audit?

If you have questions that are not answered by this guide, please contact our CPD team on cpd@optical.org.

CPD provider audit

1. The audit process

It is likely that most providers will be selected for audit at some point in the time they are actively delivering CPD to GOC registrants. Being selected for audit is nothing to be concerned about if you have been keeping good records of the CPD you have delivered, and are responsive to and reflective of feedback received from those completing your CPD.

1.1 First steps and what we look at during audit

If you are selected for audit, the primary contact of the provider account will be notified by email. Audit selection happens throughout the calendar year. When you receive this notification, no immediate action will be required from you.

We may not look at all the records on your provider account as part of the audit, particularly if you are selected for audit in the final year of a CPD cycle when you may have delivered many CPD activities. The auditor will be given a sample of your records to audit. The auditor will not be able to change which records they are asked to look at and you should not ask them to do so.

1.2 What auditors are looking for

When auditing your records, auditors are looking to see that you are complying with the Standards for CPD providers. These standards set out what we expect of you in terms of CPD delivery and administration.

1.3 Supplying further information

Most providers will not need to supply any additional information in order for the audit of their records to proceed. In some circumstances, however, and depending on how far into the cycle you are chosen for audit, you may be asked to supply additional information – for example, if data is missing, or if information you have logged is unclear.

If this is the case for you, your auditor will contact you and explain why they need the information they are asking for. It is the responsibility of the primary contact of the provider account to ensure that the information is provided as soon as possible, and within 14 calendar days, so that the audit can be completed and a definitive outcome given. Being asked to supply further information is not in itself a reflection that you will not pass audit.

1.4 Outcomes of CPD provider audit

You will receive an email from the CPD team once the audit has been completed. This will usually be within six weeks of your receiving the initial notification email and will include a short report written by the auditor with their findings. The potential outcomes of audit are outlined below and summarised in Table 1.

It will be clear from the auditor's report which outcome applies to you, and whether there are any immediate actions for you to take.

Audit outcome	Description
Passed	The records are of a good standard and are sufficiently detailed to be able to quality assure CPD provision. The auditor may still give tips for improvement or development. No more action is required from you.
Requires improvement	Improvement is required in your record-keeping and/or provision to pass audit. The auditor will provide information on what you need to do to reach an acceptable standard, with reference to the Standards for CPD providers. This outcome will be a trigger for targeted audit within the following 12 months.
Serious concerns	There are serious issues with your record-keeping and/or provision which are not compatible with the Standards for CPD providers. Depending on the extent of the issues identified, this may trigger a review of your approved CPD provider status.

Table 1 – Audit outcomes

1.4.1 Audit outcome – passed

If you receive this outcome from the auditor, your CPD provider records are of a good or acceptable standard and evidence the CPD learning provided to registrants is of good quality and that you are meeting the Standards for CPD providers. No further action is required and the audit has been passed.

The auditor may provide in their report some suggestions on how you may be able to further improve your records.

We expect that most providers will receive this outcome if they are maintaining diligent records and acting upon feedback received from registrants on the CPD they have delivered.

1.4.2 Audit outcome – requires improvement

If you receive this outcome from the auditor, you will need to take action in accordance with the auditor's recommendations. You will be given specific actions and timeframes in which we expect you to complete them. If you cannot complete the actions within the specified timeframes for any reason, you must contact the CPD team (cpd@optical.org) as soon as possible to advise of this and to explain why. Failure to respond or to take the actions requested with no explanation will trigger a move to a 'serious concerns' outcome.

An example leading to this outcome would be where poor, incomplete, or inappropriate details of the CPD you have delivered have been logged in your provider account.

Providers receiving a 'requires improvement' outcome may be subject to targeted audit in the following 12 months (see '2. Targeted audit', below). If the audit is successfully passed at that point, no further targeted steps will be taken. If, following the targeted audit, you receive another 'requires improvement' outcome or 'serious concerns', this will trigger a review of your approved provider status.

1.4.3 Audit outcome – serious concerns

If you receive this outcome from the auditor, the issues with your record-keeping and/or CPD provision will be itemised with information about how these issues render you incompatible with the Standards for CPD providers. This outcome will only be issued where issues are deep-seated and cannot be easily remedied, although you will still be given an opportunity to make improvements to your provision and/or record-keeping. The CPD team will support you in doing this.

The GOC's Chair of Auditors will review all cases where a provider receives this outcome and, taking into account the advice from the auditor, will make a decision on whether you should retain approved provider status or whether you should move to 'provisional provider' status.

Provisional provider status allows you to deliver approved CPD to GOC registrants, but you must have each individual CPD activity approved in advance of it being delivered and comply with much more stringent administrative requirements than you would as an approved provider. You will be assigned a mentor who will provide guidance on your submissions for CPD activity approvals. The CPD team will provide advice on the steps involved in being reinstated as an approved provider.

2. Targeted audit

2.1 The circumstances triggering targeted audit

Providers may be subject to targeted audit if there are repeated or serious issues with their provision or administration, or if complaints have been made about their CPD provision or administration. Circumstances triggering targeted audit could include (but are not limited to):

- Poor feedback score for a CPD activity or series of CPD activities
- The GOC's receipt of a formal complaint about the quality of CPD provision or the conduct of presenters, facilitators, or other agents or personnel connected to the provider
- Poor account administration
- Failure to respond to requests for information during audit
- One or more presenters, facilitators or other agents used by the provider being subject to an interim order and/or any other action taken against them by a Fitness to Practise Committee relating to their behaviour or clinical competence
- An outcome of 'requires improvement' or 'serious concerns' being received at the previous audit
- Any instance where the provider's adherence to the Standards for CPD providers is brought into question

The GOC may also instigate a targeted audit in circumstances falling outside the above. If this applies to you, you will be given reasons for the audit being instigated.

2.2 The targeted audit process

Providers selected for targeted audit will be informed by email. The primary contact of the provider account will be notified of the targeted audit, along with the reasons for selection, before targeted audit takes place. This could be at any point throughout the calendar year.

2.3 What we look at during targeted audit

As part of targeted audit, we will primarily look at records pertaining to issues you have been having – for example, if you have had persistently low feedback about the quality of your webinars, we will ensure that some of the records we look at relate to your webinars. We may look at any number of your CPD records to get a broad view of your provision as necessary for targeted audit.

2.4 Supplying further information during targeted audit

You may be asked to supply additional information – for example, if data is missing, or if information you have logged in your provider account is unclear. If this is the case for you, your auditor will contact you and explain why they need the information they are asking for. It is the responsibility of the primary contact of the provider account to ensure that the information is provided as soon as possible, and within 14 calendar days, so that the audit can be completed, and a definitive outcome given.

If we do not receive the requested information and you have not contacted your auditor to explain why, then the case will be referred to the GOC Chair of Auditors and your approved provider status may be revoked.

2.5 Outcomes of targeted audit

You will be contacted by email with the outcome of the audit. The potential outcomes of targeted audit are the same as those of routine audit listed under 1.4 with a few minor differences, as outlined in Table 2.

Targeted audit outcome	Description
Passed	The records are of a good standard and are sufficiently detailed to be able to quality assure provision. The auditor may still give tips for improvement or development. No more action is required from you.
Requires improvement	Improvement is required in your record-keeping and/or provision to pass audit. The auditor will provide information on what you need to do to reach an acceptable standard, with reference to the Standards for CPD providers. Under targeted audit, this will be a trigger for review of your approved provider status.
Serious concerns	There are serious issues with your record-keeping and/or provision which are not compatible with the Standards for CPD providers. Under targeted audit, this will result in an automatic removal of your approved provider status.

Table 2 - Targeted audit outcome

3. Appeals and complaints

3.1 Appealing the outcome of audit

If, after receiving the auditor's report, you disagree with the outcome given, the first step would be to discuss this with the CPD team. They cannot change the outcome, but they can explain why you have received that outcome and provide clarity (if needed) on the report.

If you still disagree with the outcome following discussion with the CPD team, you can ask for this to be escalated to an audit outcome appeal. You should contact the CPD team in the first instance at cpd@optical.org. The GOC Chair of Auditors will look at your request, review the decision, and aim to provide a response to you within 30 working days. During this time your status as an approved provider may be affected. The CPD team will discuss this with you if this is the case.

3.2 Complaints

Complaints about a conflict of interest of an individual auditor should be sent to the CPD team and addressed to the GOC's Director of Regulatory Strategy, who will aim to provide a response within 30 working days.

Any other complaints should be dealt with through the GOC's [corporate complaints process](#).

4. What happens to your data

4.1 Processing data during audit

Your provider records and any further information you provide may be viewed by the GOC and our agents if you are selected for audit.

Auditors have a duty to act upon any information that may raise concerns about your CPD provision or your provider status. We will process your data as permitted by the Data Protection Act 2018. Data will be used for the purposes of conducting the audit.

For more information on how we use and handle data as an organisation, please contact our Governance team at foi@optical.org.

4.2 Data retention after audit

Once the audit has been completed, how we handle your data is determined by the outcome of the audit. If the audit is passed, then the audit data we hold will be subject to the GOC's CPD data retention policy and retained for two complete cycles beyond the current cycle.

If the outcome was 'requires improvement', the data and audit outcome will be stored according to the CPD data retention policy and reviewed as part of your subsequent targeted audit.

If the outcome was 'serious concerns', the data and audit outcome will be stored according to the CPD data retention policy and reviewed as part of your approved provider status review and/or subsequent targeted audit.

4.3 Using information and data from CPD provider audit

The GOC may use information and data from approved provider audit for research purposes, reporting, and for the purposes of reviewing our internal systems and procedures.



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