

COUNCIL

Continuing Education and Training (CET) scheme

Meeting: 11 November 2015

Status: for decision

Lead responsibility:

Alistair Bridge, Director of Strategy

Council Champion:

None.

Manager/paper author:

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Acting Head of Education and Standards

Project Board: SMT

Team: Joy Bolt (CET Manager); Lola Butterfield (Administration Officer); Simon Grier (Communications Manager); Amarinder Cooner (Communications Officer); Nadia Patel (Registration Manager); Agnieska Knapik (Head of I.T.); Marie Bunby (Policy Manager); David Rowland (Head of Policy and Research); and Tim Ray (CET consultant)

Purpose

1. The purpose of this paper is to provide an update to Council on the progress registrants have made towards completing their Continuing Education and Training (CET) as part of the current CET cycle, explain the process for the end of the current three year CET cycle and outline the changes which will take place from the beginning of the new three-year CET cycle from 1 January 2016.

Recommendations

2. It is recommended that the Council notes:
 - 2.1 the current number of registrants who have outstanding requirements for the 2013-2015 CET cycle at paragraph 12;
 - 2.2 the process for the end of the 2013-15 CET cycle and planned communications and advises on any additional measures that would be appropriate;
 - 2.3 the planned changes to the CET system for the 2016-18 CET cycle; and
 - 2.4 our intention to carry out a comprehensive evaluation of the current three-year CET cycle and our commitment to engage with and consult stakeholders, including our statutory advisory committees, before introducing further changes to the CET system.
- 2.5 The Council is asked to appoint a Council Champion for our evaluation of CET project.

Strategic objective

3. Work to manage the CET Scheme, including the provision of advice, approval and quality assurance of provision and auditing and a project to evaluate the continuing education and training (CET) scheme is included in the 2015/16 business plan. The work programme and project falls into the strategic aim of higher standards – promoting higher standards across the optical professions. The Head of Education and Standards is responsible for this work.

Risks

4. The following risks are associated with the issue, as identified in the Education and Standards risk register:
 - 4.1 **New CET system not delivered as per contract with system provider, resulting in delay to new CET cycle.** This is mitigated by having signed contract with clear terms and engaging a CET consultant to liaise with the system provider.
 - 4.2 **Changes to new CET system not adequately communicated resulting in increased confusion and administration.** We have developed a clear communications plan to mitigate this risk. A communication has been sent to approvers and providers and we are now preparing a communication to registrants and updated CET materials for the website.
 - 4.3 **Catastrophic failure of CET System due to technical failure, virus, electrical problem, fire or flood (could be a temporary or permanent loss of the system).** The CET system is administered via an external server with back-up. This arrangement is reflected in our business continuity plan.
 - 4.4 **Data loss by CET contractor due to data security breach or system failure.** The contract with the CET provider places requirements on contractor to secure data and only use for the purposes designated.

Background

5. The GOC CET scheme is administered in accordance with the *Continuing Education and Training Rules 2005* (as amended in 2012) which can be found on our website:
https://www.optical.org/en/about_us/legislation/rules_and_regulations.cfm
6. The current CET cycle began on 1 January 2013 and will end on 31 December 2015. Registrants will therefore have had three years within which to complete all of the targets required to pass the CET cycle.
7. The CET requirements are outlined in our publication *Enhanced CET for 2013 – a guide for registrants* (Annex 1). This includes:
 - 7.1 the overall points requirement (generally 36 points);

- 7.2 the requirement for at least half of these points to be undertaken in interactive activities;
 - 7.3 the requirement to complete CET in relation to all the competencies relevant to being either an optometrist or a dispensing optician;
 - 7.4 for optometrists and contact lens opticians there is an additional requirement to complete at least one peer review;
 - 7.5 for contact lens opticians and therapeutic prescribers there are additional specialty points requirements; and
 - 7.6 for contact lens opticians and therapeutic prescribers there are additional competencies to be completed.
8. The exception is where a registrant joined the register part way through the CET cycle, in which case their CET requirements would have been determined on a pro rata basis.
 9. All CET activities must be approved in advance and are categorised according to the competencies that they cover, whether they are interactive and the number of CET points that they attract. CET must be delivered by pre-approved providers, except for peer reviews which can be applied for by individual registrants. The GOC has a team of around 40 CET approvers to review and approve/reject CET applications against set criteria. Approvals only last for one year and a provider must renew approval for a CET activity if they wish to deliver this again the following year.
 10. The CET is administered through an online system which supports both the approval of CET as well as tracking and recording the CET completed by individual registrants. Each registrant has a login which allows them to see their requirements, search for CET activities, review and accept CET points, submit peer discussions arranged by individuals and complete an optional Personal Development Plan to help them develop and reflect on learning goals, linked to CET.
 11. The online approval system allows CET providers to apply to be a provider, submit CET for approval and upload CET points. It also allows the CET approvers to review and approve/reflect CET applications.
 12. The next three year CET cycle will begin on 1 January 2016 and will run until 31 December 2018.
 13. As of 4 November 2015, out of 21,097 registrants required to complete CET, 14,838 (70.3 per cent) have completed all of their CET requirements, including total points, interactive CET, competencies and specialty points. This figure is made up of the following categories:
 - 13.1 9,904 Optometrists (69.4 per cent of total 14,261);

- 13.2 3,729 Dispensing Opticians (71.8 per cent of total 5,188);
- 13.3 916 Contact Lens Opticians (72.6 per cent of total 1,261); and
- 13.4 289 Therapeutic Prescribers (74.7 per cent of total 387).
14. As of 4 November 2015, this leaves 6,259 (29.7 per cent) who have yet to complete their requirements. This figure is made up of the following categories:
- 14.1 4,357 Optometrists (30.6 per cent of total 14,261);
- 14.2 1,459 Dispensing Opticians (28.2 per cent of total 5,188);
- 14.3 345 Contact Lens Opticians (27.4 per cent of total 1,261); and
- 14.4 98 Therapeutic Prescribers (25.3 per cent of total 387).
15. The number outstanding does not distinguish between those with only one CET point outstanding and those who have not yet completed any CET. The table below shows the number of requirements from paragraph nine that have not been met. This shows that as at 4 November 2015 of the 6,259 registrants who have yet to meet their requirements, 5,295 have to complete only one or two requirements.

Number of requirements not met	Contact Lens Optician	Dispensing Optician	Optometrist	Therapeutic Optometrist	Total
1	155	722	2,192	49	3,118
2	99	537	1,517	24	2,177
3	47	200	475	15	737
4	27		173	5	205
5	11	-	-	4	15
6	6	-	-	1	7
Total	345	1,459	4,357	98	6,259

16. At Annex 1 we also provide some data on the trends for completion of CET over the last few weeks. Based on the current rate of completion of CET, we estimate by 31 December 2015 19,107 (90.6 per cent) of registrants will have completed their CET; leaving 1,990 (9.4 per cent) of registrants not having completed their CET.
17. However, we have been advised by our CET consultant that these figures follow the normal pattern for previous CET cycles and that we will see a significant increase in the weekly rate of completions as we approach the end of the year. We have also received the same advice from our Education Committee and Standards Committee. The rate of completion has already risen from an average of 100 completions per week in July 2015 to the current 411 per week. The figure would need to rise again to around 815.6 completions per week for all registrants to meet their CET requirements by the end of December 2015. However, there will be some registrants who do not

intend to remain on the register beyond the end of the three-year cycle and therefore do not intend to meet their CET requirements.

Analysis

What will happen at the end of the CET cycle?

18. Registrants must have met all of their CET requirements as outlined in paragraph seven by 31 December 2015.
19. The CET system will close between 1 January and 11 January 2016 to allow for the system provider to collate information on those that have not met their CET requirements and to launch the new system to support the CET cycle for 2016-18.
20. Those who have not met their CET requirements will be subject to administrative removal. They will first be issued a 14 day right to appeal this decision, but the appeal will only be successful if the information on which the removal was based was not factually accurate.
21. The Registrar may grant an extension for completion of CET until 15 March 2016 for those with exceptional circumstances, such as serious ill health. This process is outlined in the legislation supporting the implementation of CET. Should those registrants not meet the extended deadline then they will also be subject to automatic removal following a period for appeal.
22. Additionally, the GOC will retain on the register those registrants who do not meet the requirements, but have outstanding fitness to practise (FTP) allegations against them. This is to ensure that the registrant remains on the register until their FTP hearing. Following the hearing the registrant will be removed as a result of the FTP hearing outcome or automatically through administrative removal as a result of having not met their CET.
23. For those administratively removed for non-compliance with the CET requirements, an automatic restoration account will be created in mid-January. To restore, the registrant will be required to complete at least 12 general CET points (six general and six specialist points for Contact Lens opticians) plus any additional shortfall from the previous 2013-15 CET cycle. This CET must also include all the competencies for that registrant, 50 per cent must be in interactive points and optometrists and contact lens opticians must complete a peer review. If the registrant is a therapeutic prescriber they must complete an additional six CET points in their speciality on top of the basic 12 points.
24. It is therefore vital for the GOC to communicate clearly the consequences of not completing the CET requirements by the end of the cycle. We initially sent out

two email reminders to registrants in August and September. We are also required to send a written notification to registrants two months prior to the end of the cycle. A formal notification of non-compliance was posted to 6911 registrants who had outstanding CET as at 26 October 2015 as required by our CET rules (amended 2012). A copy of the letter is provided at Annex 2. We expect the completion rate to increase significantly once these personalised, targeted reminders have been received by registrants.

25. We have communicated regularly with stakeholders regarding CET requirements over the past three years. This includes work with the optical trade press, articles in our own eBulletins, attendance and talks at optical trade shows, use of the website and social media, and disseminating information via professional and representative bodies. In particular, we have highlighted the changes that came in with the new system of enhanced CET, including the fact that there is no 'shortfall period' at the end of the cycle as there was previously. Under the current system registrants can only gain extra time to meet their requirements if they can show there are exceptional circumstances.
26. In July 2013, we communicated the requirements to all registrants and issued an Enhanced CET guide for registrants, which can be found on our website here: <https://www.optical.org/en/Education/CET/index.cfm>. All those who joined the register after July 2013 will have received this information with their registration packs.
27. There is a sophisticated online support system called MyCET which can be accessed via our website, with registrants having their own unique login. The login provides access to a personal account which clearly outlines an individual's outstanding CET requirements, provides a directory of available CET and allows them to accept points for CET that they have completed. All registrants have to complete CET online through the system, so will have been made aware of the outstanding requirements each time they logged in. Each year of the cycle the GOC issued a series of communications towards the end of year informing those with outstanding annual requirements (generally six points of CET per year) that they had outstanding CET.

What changes will happen to the CET cycle in 2016-18?

28. In line with the strategic objective outlined in paragraphs three and four, we are making some changes to the CET scheme for the next three-year cycle from 2016-18. The main change is to require all registrants to carry out CET in relation to the new standards of practice as decided by Council at its meeting in July 2015. In addition, we are making some incremental improvements to the CET system to:
 - 28.1 encourage reflection on practice;

- 28.2 reduce the cost and administrative burden of the system for registrants, CET providers and the GOC; and
 - 28.3 improve the quality assurance of the approvals system.
29. These changes are being delivered by our CET system provider as part of the development work needed to introduce the new requirement to carry out CET in relation to the new standards of practice.
30. It remains our intention to carry out a comprehensive evaluation of the current three-year CET cycle. This will involve examining:
- 30.1 registrants' engagement with the 2013-15 CET cycle;
 - 30.2 how the approval system could be developed to improve quality and consistency, and reduce administrative burdens; and
 - 30.3 the current arrangements for delivering the online CET system to ensure that there is appropriate governance and that we secure value for money.
31. In line with our standard practice, we will engage with and consult stakeholders, including our statutory advisory committees, before introducing any further changes to the CET system.
32. Council decided at its July 2015 meeting to introduce a new CET competency for all registrants called 'Standards of Practice' to ensure that all registrants are required to carry out CET in relation to the new standards of practice. This will replace the existing Professional Conduct competency, so there will be no overall increase in the number of competencies. The new competency will cover the content of the standards of practice and all registrants will be required to complete at least one piece of CET in this competency during the 2016-18 CET cycle.
33. In addition, when registrants log into the new CET online system for the first time during the 2016-18 CET cycle, they will be taken immediately to the Personal Development Plan (PDP) screen rather than the ordinary screen outlining their CET requirements. Here they will be required to:
- 33.1 define their scope of practice through answering a series of questions. This encourages registrants to think about what their own scope of practice is and how this links to the CET they select. The scope of practice can be updated throughout the cycle; and
 - 33.2 make a declaration to confirm that they have read and will abide by the new standards of practice – a non-CET activity.
34. The system will automatically create a learning goal for standards of practice within the PDP. All registrants will be expected to link at least one piece of CET

related to standards of practice to this learning goal during the three year CET cycle.

35. Following completion of the activities in 33 and 34 the registrant is taken to the usual CET screen outlining their CET requirements for the 2016-18 cycle.
36. The more visible links to the PDP are intended to encourage registrants to focus on their continuing professional development and reflect on their learning needs: currently the PDP is used by very few registrants.
37. During the new cycle registrants will be able to add additional learning goals to their PDP in addition to the default 'standards of practice' learning goal. When a registrant completes a CET activity and accepts the points online, they will be given the option to link the activity to an existing learning goal, either the default standards of practice learning goal or any other they have added to their PDP.
38. Registrants will now need to complete a reflective statement whenever they wish to accept the points allocated to a CET activity. This has previously only been applied to peer review/peer discussion activities, but will now apply to all activities.
39. To encourage a culture of continuing professional development (CPD) rather than simply CET, the registrant will also be able to add non-CET activities to the PDP, including CPD activities and appraisals. These can be linked to learning goals that may not be fully achieved through CET alone.
40. To encourage the use of the PDP further there will be additional functionality within the search function for CET activities, whereby the system will search and suggest CET activities which might help the registrant to achieve their learning goal.
41. There is additional functionality for therapeutic prescribers to keep an online prescribing log to meet their annual requirement to submit this as part of their retention on the specialist prescribers register.

Changes to the approval system for CET

42. The current CET online approval system will close on 17 November 2015. From this point on, providers will no longer be able to have CET for the 2013-15 CET cycle approved. However, providers will be able to apply for an extension of the approval of CET that has/will expire during 2015 up until 31 December 2015.

43. The new approval system will launch the day after the old approval system closes. From this point, providers will be able to apply for CET approval for activities to be delivered in the 2016-18 CET cycle, i.e. from 1 January 2016.
44. Any activities already approved under the existing 2013-15 CET cycle will continue to be approved in the new CET cycle until their expiry date or 31 March 2016, whichever is earlier. Two exceptions are listed below:
 - 44.1 Interactive distance learning activities – due to additional information required to demonstrate that an activity is interactive, distance learning activities which are currently approved as interactive will transfer to the new cycle, but the interactivity approval will cease and the activity will only generate one CET point. Providers will need to re-apply for approval of these activities.
 - 44.2 Any activity currently approved for the ‘Professional Conduct’ competency will transfer to the new cycle, but the approval will automatically change to be against the ‘Standards of Practice’ competency. The approval for these activities will also expire on 31 March 2016.
45. All approvals under the new 2016-18 CET cycle will be approved for the full duration of the cycle, i.e. up to 31 December 2018. This is intended to reduce the administrative burden on both the provider and the GOC. The CET can be delivered as many times as required during the three year cycle once approved.
46. We issued separate communications to our CET providers and approvers on 28 October 2015 to communicate the changes and these can be accessed through the following links:
 - 46.1 CET Provider communication:
http://www.optical.org/filemanager/root/site_assets/education/cet_documents/changes_to_the_cet_system_-_providers.docx
 - 46.2 CET Approver communication:
http://www.optical.org/filemanager/root/site_assets/education/cet_documents/changes_to_the_cet_system_-_approvers.docx

Feedback from advisory Committees

47. We have consulted with both the Standards and Education committees in relation to the end of the current CET cycle and they have made a number of suggestions about communications, including:
 - 47.1 spelling out in the personalised letters to registrants the consequences of not completing CET, rather than just providing a general reminder (see notification at Annex 2);
 - 47.2 continued engagement with professional and representative bodies to ask them to remind their members to meet the CET requirements.

48. We have taken forward these suggestions and encourage Council members to also promote this message through their own networks within the professions.

Impacts

49. The following implications have been identified:
- 49.1 Reserves – None;
 - 49.2 Budget – None;
 - 49.3 Legislation – all decisions on CET must comply with the CET Rules 2005 (as amended 2012);
 - 49.4 Resources – an additional administrative post has been recruited from October 2015 to support both the CET function and the Governance department. The administrative burden may increase dependent on number of registrants who do not meet the requirements by 31 December 2015;
 - 49.5 Equality, diversity and inclusion (EDI) – we need to ensure that decisions on exceptional circumstances or removal for non-compliance are not discriminatory;
 - 49.6 Human Rights Act – None; and
 - 49.7 Sustainability – None.

Devolved nations

50. No implications/differences in relation to this area and the devolved nations have been identified.

Communications

51. We have developed a communication plan that has involved:
- 51.1 communicating the requirements to complete CET by 31 December 2015 to those registrants who currently have outstanding requirements;
 - 51.2 communicating to CET providers and approvers the changes that will occur to the approval system during November 2015; and
 - 51.3 communicating the consequences for those registrants who did not complete the CET requirements by either 31 December 2015 or 15 March 2016 (if granted an extension due to exceptional circumstances).
52. The GOC will communicate to registrants the changes that will happen to the CET cycle from 1 January 2016, at the beginning of December 2015.

Timeline for future work

53. The key dates for Council to note are as follows:

Date	Action
17 November 2015	Current approval system for 2013-15 CET cycle ends. New system for approvals for 2016-18 CET cycle launches.
December 2015	Information sent to registrants on new CET cycle.
31 December 2015	All CET requirements must have been met
1-11 January 2016	CET online system for registrants not available
12 January 2016	New CET system launches for registrants
By mid-January 2016	Letters issued to those with outstanding requirements
End of January	Administrative removal of those who have not met their requirements
15 March 2016	Those granted extension due to exceptional circumstances must have completed their CET
31 March 2016	All CET approved under the existing CET cycle will expire

Attachments

Annex 1 – Trends in completion rates

Annex 2 – Notification sent to those with outstanding CET

Trends in completion rates

Week commencing	September	5/10/15	12/10/15	19/10/15	26/10/15	02/11/15	04/11/15
Total registrants	20,839 (estimate)	20,839	20,852	20,898	21,063	21,088	21,097
Those who have met CET requirement	11,921	12,418	13,120	13,555	14,152	14,563	14,838
Those with outstanding CET	8,931	8434	7,732	7,343	6,911	6,525	6,259
Number who met requirements in preceding 7 days	375	497	702	435	432	411	686 (over past 9 days) Equivalent to a weekly rate of 533.6
Registrants who would meet requirements based on current rate of completion	16,796 (80.6%)	18,540 (89%)	20,094 (96%)	17,905 (86%)	18,040 (85.6%)	17,851 (84.7%)	19,107 (90.6%)
Registrants who will have outstanding CET requirements as at 31 December 2015 based on the current rate of completion	4,043 (19.4%)	2,299 (11%)	758 (4%)	2,993 (14%)	3,023 (14.4%)	3,237 (15.3%)	1,990 (9.4%)
Completion rate required for 100% to meet requirement by 31 December 2015	686	688	702	734	734.3	815.6	782

Notification to registrants with outstanding CET

[Name]
[Address]

30 October 2015

Dear [Name]

Notice to complete your CET requirements by 31 December 2015

It appears from our records that **as of 26 October 2015** you have not met all your CET requirements for the 2013-15 cycle. This means there will be a shortfall if you do not undertake sufficient approved CET activities by 31 December 2015.

What you should do next

Please log into MyGOC at www.optical.org/en/login/index.cfm to open your CET portfolio and identify the CET requirements that you have not yet met.

Please remember that CET points will only count towards your requirements if you have accepted them in your CET portfolio.

If you have completed CET activities and have points pending, you must accept the points before 31 December 2015. If you need to undertake further activities, you must do so and accept the points before 31 December 2015.

You can search for available CET using the CET directory within your portfolio.

There is more information about CET on our website at <https://www.optical.org/en/Education/CET/index.cfm>

Removal from the register

If you fail to meet your CET requirements by 31 December 2015, the Registrar may remove your name from the GOC's register.

If you fail to meet your CET requirements in relation to a registered specialty by 31 December 2015, the Registrar may remove particulars of that specialty from your entry in the register.

In the event of removal, your name and specialty will not be restored unless you complete the outstanding CET requirements.

Please note that removal from the GOC register may also result in your name being removed from the NHS ophthalmic performers list.

Dispute procedure

The procedure for disputes about compliance with CET requirements is set out at Rule 22 of the GOC Continuing Education and Training Rules 2005 (as amended in 2012). You will find a copy of Rule 22 below.

Further assistance

If you have any questions about your CET, please email our Education team on cet@optical.org.

Yours faithfully



Marcus Dye, Acting Head of Education and Standards
mdye@optical.org

CET Rule 22: Disputes as to compliance with CET requirements

- (1) This rule applies where the information provided by a registrant under rule 21 in relation to the immediately preceding relevant period is not in accordance with the information recorded by the administrator under rule 19 in relation to that period.
- (2) As soon as reasonably practicable following the end of the relevant period to which the discrepancy relates, the administrator shall send a request to the registrant asking him to produce to the registrar for each approved event in relation to which there is a discrepancy –
 - (a) if the event was provided by a listed provider, a copy of the statement provided to the registrant under rule 11(1)(b);
 - (b) if the event was provided outside the United Kingdom by a person other than a listed provider, a copy of the records kept by him under rule 20(3), together with evidence to show he attended the event.
- (3) Where the registrant has received a request for information under paragraph (2), he shall produce to the registrar within 21 days copies of the documents requested.
- (4) Where the administrator sends a request for information under paragraph (2) to the registrant, he shall also send to the registrar - (a) a copy of the request for information; and (b) a copy of the relevant extract from his records kept in accordance with rule 19.
- (5) The number and type of CET requirements the registrant has obtained shall be determined by the registrar within the period of 14 days beginning with the due date for receipt of information under paragraph (3).
- (6) In making a determination under paragraph (5) the registrar shall take into account the information provided by the registrant under paragraph (3) and that provided by the administrator under paragraph (4).
- (7) The registrar shall immediately notify the registrant and the administrator of his determination.