

COUNCIL

Continuing Education and Training (CET)

Meeting: 9 May 2018

Status: for decision

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Project Board: SMT

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Purpose

1. The paper proposes revised plans regarding the review of the CET scheme for agreement by Council.
2. In communicating and consulting on our planned improvements to the CET scheme, we will explain how these changes:
 - 2.1. will contribute to achieving our strategic objective of supporting the learning and development of optical professionals; and
 - 2.2. are aligned with the work we are doing through the Education Strategic Review to ensure that students are equipped for future roles.

Recommendations

3. Council is asked to:
 - 3.1. consider the revised project scope;
 - 3.2. agree the revised project deliverables and timescales at paragraphs 10 and 11;
 - 3.3. agree to undertake a consultation exercise on the basis of the information at paragraph 13, subject to discussion and feedback on content;
 - 3.4. consider and agree the recommended option for CET requirements during the proposed 'transitional year' at paragraph 17.4;
 - 3.5. delegate authority to sign-off the consultation document to the Chief Executive and Registrar and Chair of Council; and
 - 3.6. delegate authority to the Chair of Council and Chief Executive and Registrar to sign off on the appointed tender to deliver the IT system as detailed at paragraph 22.

Strategic objective

4. **Learning and development of optical professionals:** this project supports our strategic objective of supporting the learning and development of optical professionals by delivering a strategic review of optical education and training and reviewing our CET scheme to ensure that both students and optical professionals are equipped for future roles.

Risks

5. The following risks are associated with the issue:
 - 5.1. Risk that the current scheme of CET, which is designed to be both a revalidation scheme and a continuing professional development (CPD) scheme, does not take account of changing scopes of practice for registrants.
 - 5.2. Risk that current delivery methodologies for CET are ineffective.
 - 5.3. Time – sufficient time to deliver change.
 - 5.4. Legislative – need to amend legislation to enable us to make some specific changes and to allow more flexibility to change the scheme generally.
 - 5.5. Current system is well-established and any change will be significant for stakeholders, including approximately 29,000 registrants and 400 CET providers.
 - 5.6. Reputational impact for GOC if the project is not delivered successfully.
 - 5.7. Risks can be mitigated by adequate resourcing, planning, consultation and notification of change.

Background

6. The CET scheme is designed to do two things: encourage continuing professional development (CPD); and ensure registrants remain fit to practise by providing a form of revalidation. In other branches of healthcare this is known as an 'enhanced CPD scheme'. Council has made it clear that the CET scheme needs to do more to promote CPD particularly as registrants increasingly take on more clinical roles. This trend makes it vital that we also have an up to date understanding of the risks to patients and that the CET scheme is focused on addressing them.

What we have heard

7. From our engagement with stakeholders so far, through the Education Strategic Review (ESR) and through our CET Reference Group, we know that there is a strong appetite for change within the sector. Our regulatory intervention seeks to address the following questions, taking account of this feedback:
 - 7.1. how do we respond to the fact that the scopes of practice of our registrants are changing and becoming more diverse (given that the current scheme restrictively defines the scope for each registrant type through defined competencies)?

- 7.2. how do we ensure that the scheme addresses the needs of revalidation and targets current and future areas of practice that carry most risk for patients (our current scheme is based on research into risk completed in 2010)?
- 7.3. how do we promote the concept of CPD and affect behavioural change so that registrants become responsible for their own learning, undertaking reflection and planning in the process?
- 7.4. how do we bring forward change at a faster pace outside the current ingrained structure of the three year CET cycle?
- 7.5. how do we ensure that we maintain public protection and registrants continue to complete CET during the transition to an amended scheme and mitigate legal and time-related risks?

Analysis

8. **What we will do:** The project team has been considering how to refocus the CET Review Project to address these questions. We are proposing to bring forward from January 2022 to January 2020 the date when we will introduce significant improvements to the scheme, with a transitional year starting in January 2019. During 2019 we will continue to maintain a robust CET scheme focused on public protection and registrants will be expected to demonstrate that they are keeping their skills and knowledge up to date. The key change in January 2020 would be a move to linking our CET requirements to more high-level learning outcomes (consistent with the learning outcomes we are developing for education prior to joining the register through the Education Strategic Review) rather than requiring registrants to do CET in relation to all the current detailed competencies, regardless of their current scope of practice. The current competencies also focus primarily on clinical skills and knowledge, whereas the proposed new learning outcomes will cover all aspects of what it means to be an optical professional and therefore do more to promote professional development.
9. This would give registrants much more room to carry out CET relating to their scope of practice and the areas where they would like to develop. However, this would be a significant cultural shift and would require us to invest in supporting registrants in taking more ownership of their development.
10. We intend to split the CET review project into two projects: a) a policy project focused on developing improvements to the scheme and b) an operational project focused on managing the end of the current cycle in December 2018 and implementing any future changes. We are also ensuring that we have dedicated resource for each of the projects, with significant additional resource overall.
11. The deliverables of the project have been re-scoped as follows:

2018 (end of 2016-18 cycle)	<ul style="list-style-type: none"> • Preparation for transitional year and new cycle • Appointment of new CET system provider (following tender) • Preparing the system for future change – building in more flexibility • Policy development and consultation • Communications for end of cycle • Communications for transitional year and new cycle • Launch approval system for the transitional year • Research into practice risks to enable us to consider changes to CET system or registration system to ensure public protection against risks, e.g. by preventing de-skilling
2019 (transitional year)	<ul style="list-style-type: none"> • Launch transitional year in January 2019 • End of cycle processing and removal processes for 2016-18 cycle • System changes for CET providers – ease of use • System changes for CET approvers – greater consistency • System changes for registrants – to promote accessibility and understanding • Improved efficiency/customer service for GOC processes • Develop approaches to promote CPD and encourage registrants to take ownership of the learning process
2020 (new cycle)	<ul style="list-style-type: none"> • Launch new scheme in January 2020 • Change name of scheme to promote CPD aspect • New underpinning standards to accommodate changing scopes of practice • Enhanced support for reflective practice – supporting materials • DO peer review – new requirement to ensure consistency between professions
2021	<ul style="list-style-type: none"> • Introduce an audit system to check the quality of CET delivery as well as pre-approving training

12. The revised policy objectives were presented to our CET Reference Group on 23 March 2018 and our Education Committee on 16 April 2018. There was positive support for the direction of travel with some guidance on how we may want to approach some of the new objectives. A clear communications plan setting out our expectations was also seen as key.

13. If Council agrees the new approach, we would plan to launch an initial public consultation on high level themes and principles in early June for a period of two months. This would also flag the policy options we are considering and give stakeholders an early notification of the direction of travel of the project. Following further development of the proposals during 2018, we will consult on the final scheme from October-December 2018. The Council will be asked to sign-off on project elements at various points during this period.

14. The consultation from June to July 2018 will explore stakeholder views on the following:
 - 14.1. understanding of the role of CET and the concepts of CPD and revalidation;
 - 14.2. proposals to review the underpinning standards of the current CET model to accommodate changing scopes of practice. It is proposed that these are presented as learning outcomes based on the Standards of Practice;
 - 14.3. change in risk profile of the profession and what this might mean for revalidation elements of any future scheme;
 - 14.4. the likelihood for de-skilling in areas of practice and what this might mean for a future CET scheme;
 - 14.5. proposals to align CET requirements for registrants to ensure consistency between the professions, i.e. introduction of peer review for dispensing opticians;
 - 14.6. operational improvements to the CET system and support materials for registrants, CET providers and approvers;
 - 14.7. revised timings for implementation and delivery including proposals for transition year and a new three year cycle in 2020;
 - 14.8. proactive parallel targeted engagement with CET providers on application of draft learning outcomes to CET approval process and how they may work – joint series of workshops with the ESR consultation;
 - 14.9. initial thoughts on impact and barriers to implementation of proposals; and
 - 14.10. reduced consultation period of two months (instead of three) to allow sufficient time for necessary changes to be introduced – mitigated by full consultation on actual scheme proposals at end of year.

Operational consideration: CET requirements for the transition period

15. Subject to the revised project plan being agreed, Council will need to determine the requirements for CET during the proposed transition year in 2019. These need to be proportionate due to the reduced timescale in which they can be met (one year), while maintaining the need for registrants to continue to maintain and develop their knowledge, skills and performance for the benefit of patients.
16. The current requirements in summary over a three year cycle are:
 - 36 CET points in total for optometrists and DOs;
 - 18 'interactive' CET points as part of the total;
 - 18 additional specialist CET points for independent prescribers (IPs) on top;
 - 18 specialist CET points for contact lens opticians (CLOs) which may be included as part of the total points;
 - fulfilment of CET in all core competencies for general practice (8 for optometrists and 9 for DOs);
 - fulfilment of CET in all core competencies for specialist practice (9 for IPs and 5 for CLOS);

- completion of a peer review for optometrists and CLOs;
 - completion of a 'specialist' peer review by IPs; and
 - completion of a minimum of 6 CET points for each separate year of the three year CET cycle.
17. We would suggest that there are four options for requirements during the transition period:
- 17.1. completion of 6 points;
 - 17.2. completion of 6 points in total including 3 interactive points;
 - 17.3. completion of a pro-rata 12 points; and
 - 17.4. completion of a pro-rata 12 points including 6 interactive points.
18. **Assumptions:** that completion of all competencies and peer review during a one year period would be too onerous on both the registrant and the CET provision sector. There is a precedent for this that any registrant joining the CET cycle in the third year of the cycle is not expected to complete peer review or the competencies.
19. **Assumptions:** that registrants will not be required to complete specialist points during this year, as this would make the process overly complex. This is mitigated by the fact that specialist registrants are not required to undertake a minimum amount of specialist points in a given year of a three year cycle.
20. **Recommendation:** the recommendation is that Council should agree the option at 17.4. The rationale is that this would be the equivalent of a third of a CET cycle and that the inclusion of 'interactive' requirements will maintain the benefit of this type of activity, without being too onerous as to require a specific peer review. This proposal is supported by the CET Reference Group who flag that it is important that registrants continue to participate during this period, both in terms of general and interactive CET.
21. We feel it is appropriate for Council to make the decision on CET requirements without consultation in order to maintain patient safety and would justify on the basis that this is a pro-rata of policies that have already been consulted on and agreed. However, if the recommendation is agreed, then we would consult on the impact as part of the consultation scheduled for May, in order to mitigate any unforeseen consequences.

Operational consideration: CET IT tender

22. Council previously approved commencement of an EU tender for the contract to supply the underpinning IT support for CET and this process commenced in December 2017 on a restricted tender basis. The process was initially halted following the expression of interest stage to allow time to reconsider the project deliverables and how this might affect the contract. It was agreed in March to continue with the tender process and this has been issued to those successfully

selected during the first stage of the process. The interested parties have until 10 May 2018 to submit a bid. Following this there will be a shortlisting and interview stage of the process. The interview panel will consist of the Head of Standards and CET, the Director of Resources, our CET consultant and an expert in applications development. It is intended that the appointment is made in June to allow sufficient time for contracting and cooling off periods before the contract commences in July. With this in mind, Council is asked to delegate final sign-off to the Chair of Council on the basis that the process followed is robust.

Impacts

23. The following implications have been identified:
- 23.1. Reserves and budget – The draft budget for 2018-19 was approved at Council in February 2018. Within that budget there was specific budget for the CET project of £127k. In order for the project to accelerate the deliverables outlined within this paper, additional costs of £150k have been identified and considered by Council as part of the budget for the organisational transformation programme. Consultation needs will be reviewed after initial engagement with stakeholders in June/July.
 - 23.2. Legislation – Introduction of peer review for dispensing opticians will require legislative reform. We are pursuing more control over drafting of our CET Rules through our legislative reform project.
 - 23.3. Resources – both policy and operational projects require dedicated teams and our revised project budget reflects the staff resources needed.
 - 23.4. Equality, diversity and inclusion (EDI) – we have started an EDI impact assessment and will continue to update this throughout the project.
 - 23.5. No impact to Human Rights Act or sustainability.

Devolved nations

24. Any CPD and Revalidation scheme will need to apply across all nations and differences in requirements must be explored through consultation.

Communications

25. A communications and engagement plan is currently in development.

Timeline for future work

26. Deliverables are provided in paragraph 11. Other key dates:

9 May	Council to agree revised project approach
June-July 2018	Initial consultation (the ESR consultation is also planned for this period)
October-December 2018	Final consultation on proposals (the ESR consultation is also planned for this period)
February/March 2019	Council to agree changes for 2020 CET cycle