



Osteopathic Practice Committee
27 February 2014
Continuing Professional Development audits

Classification	Public
Purpose	For noting
Issue	Enhancements to the Continuing Professional Development (CPD) audit process in relation to sampling and feedback.
Recommendations	<ol style="list-style-type: none">1. To note the revised approach to selecting audit samples in the <i>CPD Annual Summary Form</i> audit process.2. To note the provision of feedback to all osteopaths as part of the CPD Annual Summary Form audit process.
Financial and resourcing implications	The changes to the process are incorporated within existing staff resources. Most communications with osteopaths are undertaken by email with minor increases in postage as a result of providing feedback to osteopaths who have not provided an email address. However, all costs are contained within existing budgets and also allow potential benefits as outlined in the paper below.
Equality and diversity implications	No equality and diversity implications have come to our attention through the audit process. There are provisions in the legislation to allow CPD hours to be carried over to the next year in particular circumstances allowing us to make adjustments and additional support in certain circumstances.
Communications implications	We communicated these changes to osteopaths in <i>the osteopath</i> magazine June/July 2013.
Annex	None
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Background

1. The General Osteopathic Council (Continuing Professional Development) Rules Order of Council 2006 (the CPD rules) made under s17 of the Osteopaths Act 1993 set out certain requirements in relation to continuing professional development for osteopaths. These requirements and further guidance about continuing professional development are set out in the Continuing professional development – guidelines for osteopaths (CPD Guidelines) available at http://www.osteopathy.org.uk/uploads/cpd_guidelines_interactive.pdf.
2. The CPD rules require all osteopaths to submit a *CPD Annual Summary Form* each year. The *CPD Annual Summary Form* will normally summarise that 30 hours of CPD have been undertaken including at least 15 hours learning with others. The osteopath is required to explain the relevance of the CPD activities to osteopathic practice and ensure compliance with other requirements set out in the *CPD Guidelines*.
3. The CPD rules also require osteopaths to maintain a CPD Record Folder containing evidence in relation to the CPD activities declared. This must be submitted for audit on the request of the Registrar.
4. The Business Plan 2013/2014 states that we will:
 - Audit 20% of CPD Annual Summary Forms each month to support registrants to meet existing standards and to identify areas of good practice and areas for development.
 - Audit 2% of CPD Record Folders each year to support registrants to meet existing standards and to identify areas of good practice and areas for development.
5. We carry out an audit on 20% of *CPD Annual Summary Forms* submitted every month. This audit confirms that the activities declared comply with the *Continuing professional development – guidelines for osteopaths (CPD Guidelines)*.
6. We also carry out an audit on 2% of CPD Record Folders to ensure that osteopaths have documented the activities listed on their *CPD Annual Summary Form* appropriately in accordance with the *CPD Guidelines*.
7. In relation to the *CPD Annual Summary Forms*, The random audit that has been undertaken over the last four years has resulted in some osteopaths not being audited at all, and some osteopaths being audited more than once.
8. Further, in relation to feedback to the osteopaths, those who were selected for audit prior to August 2013 would only receive feedback on their submission if the activities declared did not comply with the CPD Guidelines, or if they had complied but also declared a large number of unacceptable activities. Many

osteopaths have been audited but had been unaware of this as their audit demonstrated successful compliance with the guidelines.

9. In March 2013, Abigail Masterson Consulting Ltd produced the *CPD Discussion Document Consultation Analysis* which stated that 62.7% of osteopaths asked, would like to receive feedback on their CPD submissions.
10. This paper provides an update on the efforts to ensure that the random sampling process for *CPD Annual Summary Forms* focusses on those who have not previously been audited. It also provides an update about changes to the process to ensure that all osteopaths audited now receive feedback about the audit process.

Discussion

11. At the outset, it is worth highlighting that our current audit process focusses on compliance with the *CPD Guidelines*. This is primarily about compliance, although it does provide us with an opportunity to provide qualitative advice about how to help osteopaths to undertake development activities.
12. Compliance with our existing CPD scheme is an important foundation to be achieved before we move to a continuing fitness to practise scheme.

Feedback

13. In response to the feedback from osteopaths, it was agreed that feedback would be provided to all osteopaths who are selected for audit of their *CPD Annual Summary Form*.
14. Osteopaths who have been audited fall into one of the following three categories:
 - Category A – Complied with minimum 30 hours requirement and all activities submitted were acceptable.
 - Category B – Complied with minimum 30 hours requirement but has submitted unacceptable activities
 - Category C – Not complied with minimum 30 hours requirement.
15. Osteopaths who fall into category A receive written confirmation that all the activities listed on their *CPD Annual Summary Form* are acceptable and comply with the *CPD Guidelines*. Osteopaths who fall into categories B and C receive more detailed feedback that outlines each non-compliant activity and advice about how to comply with the *CPD Guidelines*.

Audit sample selection

16. A slightly more targeted approach in the process used to select osteopaths for audit has now been implemented. Samples are identified in advance of

submission. Osteopaths who have been audited in the past are excluded from the random sample until 20% is achieved. This approach will continue until all osteopaths who have not been audited to date have been audited. This will mean that, over time, we will audit every osteopath over a five year period. The purpose of this change is to continue to raise overall compliance rates with the *CPD Guidelines* by auditing a different pool of osteopaths.

17. At this stage, we are unable to provide a direct comparison with compliance rates prior to implementation of the new process due to the data of past audits being categorised in a different manner. In any event, through provision of advice about how to comply with the Guidelines should enable compliance rates to continue to rise.
18. We hope that there are a number of possible benefits from providing additional feedback to osteopaths:
 - Most osteopaths can be reassured that they are complying effectively with the *CPD Guidelines* whilst also highlighting awareness of the *CPD Guidelines* and the importance of continuing to comply.
 - For those that are not complying, bespoke feedback and advice is provided to help them to comply with the *CPD Guidelines*. This provides an opportunity to highlight to osteopaths the importance of complying with the *CPD Guidelines*, the purpose of continuing professional development and the importance of considering relevance to practice, all of which will be beneficial when moving to our Continuing Fitness to Practise Scheme which will require more than 'compliance'.
 - The act of ensuring that all osteopaths are audited over a given period of time reinforces awareness of and compliance levels with our existing guidance.
 - Awareness of gaps demonstrated in audit help us to provide generic advice to osteopaths through articles in *the osteopath* magazine.

Recommendations:

1. To note the revised approach to selecting audit samples in the CPD Annual Summary Form audit process.
2. To note the provision of feedback to all osteopaths as part of the CPD Annual Summary Form audit process.