



FACULTY OF
PUBLIC HEALTH



CONTINUING PROFESSIONAL DEVELOPMENT (CPD) AUDIT POLICY

CPD AUDIT POLICY



Background

All FPH members are required to meet minimum CPD standards either by participating in the FPH CPD scheme and submitting annual CPD returns or by being given a formal exemption against the agreed criteria. The annual deadline for returns/exemption applications is 31 March.

Each year, members of FPH are required to submit a satisfactory return to confirm that they have undertaken continuing professional development (CPD) activities related to their professional competence and personal development plan (PDP) during the previous calendar year. Those members who have been formally exempted by FPH against the agreed exemption criteria (http://fph.org.uk/prof_standards/cpd/exemptions/default.asp), including those who are in public health training, or have confirmed they have retired from all public health practice, are not required to submit an annual return. FPH, through the CPD Co-ordinators, undertakes an annual audit of a random 10% sample to assure FPH of the quality of the returns.

Detailed written guidance is provided below for all those selected to take part in an annual audit.

Why do we need an audit?

The purpose of the annual audit of CPD returns is to provide quality assurance for the CPD returns. It is a simple system which aims to ensure that the audit is fair, transparent and robust.

CPD is a professional obligation for all public health professionals. It is intended as a tool to ensure that individuals develop and maintain the necessary knowledge, skills and attributes to practise effectively and work towards improving the health of the population. CPD will be one of the key components in the mandatory revalidation process for all public health professionals.

Particular emphasis is placed in the audit on:

- the provision of reflective notes to support each activity;
- the provision of a personal development plan (PDP) so that a link between the relevance of CPD activities to an individual's job can be audited as well as quantifying the activities themselves through CPD credits;
- the provision of individualised feedback; and
- a framework to support those who fail to respond to the audit request or whose audit submission is unsatisfactory.

How will the audit be conducted?

If an individual is included in the 10% random audit sample, audit material for the previous calendar year will normally be requested in the second quarter of the year (see *When will the audit be carried out* section) and the individual will be asked to submit specific documentation (see *What evidence needs to be submitted* section) within four weeks. This may be hard copy or printed from the electronic record (online diary). It is intended that in the future the audit submission will be automated via the online members' area on the FPH website. Until this facility is available, paper submissions are required by post.

Each audit submission will be allocated by the FPH CPD Administrator (under the guidance of the CPD Director) to a CPD Co-ordinator in a constituency (region/country, etc) other than that of the auditee.

Owing to the nature of the records, the auditee's name will be known to the auditor, but all documentation will be dealt with in strict confidence and will be electronically deleted or shredded after the audit process has been completed.

The auditor will review the documentation submitted using a standardised checklist form (see Appendix 1) which comprises both objective measures and free text.

The FPH CPD Administrator will use the completed checklist forms to compile an anonymised report for the CPD Co-ordinators Committee, the Standards Committee and the FPH Board, reporting separately on the random 10% sample and on any previous late and non-responders and previous 'unsatisfactory' assessments (see *Who will be audited* section).

A copy of the completed checklist form will be sent to the auditee as feedback (see *How will feedback be provided* section). It is intended that the auditor will give an overall 'satisfactory' or 'unsatisfactory' assessment (see *What are the audit thresholds* section).

Those submissions assessed as 'unsatisfactory' will be reassessed by a second CPD Co-ordinator who will not see the checklist form completed by the first CPD Co-ordinator. The two CPD Co-ordinators will then discuss and agree whether the submission is 'satisfactory' or 'unsatisfactory'. If there is no consensus of opinion, the submission will be referred to the CPD Director.

It is also expected that in future years CPD certificates will record 'CPD return for [year] not audited' or 'CPD return for [year] audited as satisfactory' or 'CPD return for [year] audited as unsatisfactory' and that both employers and professional appraisers will be advised to view the CPD certificate as part of managerial and professional appraisal.

Support will be available through the FPH CPD Director and Deputy Director, the CPD Administrator at the FPH office, constituency CPD Co-ordinators and professional appraisers if required (see *Where can I get more help?* section).

Who will be audited?

The sample size is currently 10%, randomly selected from a list of those who are undertaking public health CPD through the FPH scheme and who have submitted a return when the audit sample is taken. (A 10% sample is in line with the Academy of Medical Royal Colleges' principles of CPD.) In addition the sample also contains those whose audit submission was unsatisfactory or who failed to respond to a request for audit material in the previous year, and all those who were exempted from submitting an audit sample in the previous year. Anyone whose audit submission is unsatisfactory or who fails to respond for up to a maximum of three consecutive years will also be included. Anyone who submits a very late CPD annual return (for example after the deadline in the third reminder letter) and thus is not included when the 10% random sample is taken, will also automatically be included in the audit the following year.

Those who submit satisfactory audit material will not normally be included in another audit for the next two years.

When will the audit be carried out?

Audit material for the previous calendar year will normally be requested in the second quarter of the year and should be sent (by post until a facility can be provided via the online members' area) to the FPH office within four weeks of the date of the request. The request will provide guidance, state what information is required and remind the auditee that the CPD return for that year has been accepted subject to audit. The audit material will be assessed against the agreed thresholds (see *What are the audit thresholds* section) by CPD Co-ordinators. Following ratification of all the results by the CPD Co-ordinators Committee, written feedback will be provided to each auditee. This will normally be in late October/early November of the appropriate year.

What evidence needs to be submitted?

The auditee should send :

- **Completed audit checklist form;**
- **Portfolio section 1: Personal details form;**
- **Portfolio section 2: Personal Development Plan** (either portfolio section 2 – preferred option – or the appraisal form 3 – http://www.fph.org.uk/prof_standards/appraisals/default.asp – but **do not send** the whole of your appraisal documentation). The PDP should cover the majority of the relevant year's CPD activities. As CPD and PDP years do not necessarily coincide, a PDP that covers at least six months of the CPD year which is being audited will be required;
- **Portfolio section 3: CPD log** each activity must be recorded in the log;
- **Portfolio section 4: CPD annual return;**
- **Portfolio section 5: Reflective notes –** there must be one reflective note for each activity and it must include the title of the activity and a factual description (see *How should a reflective note be structured* section). It should not be just a record of what happened. The FPH has posted some examples on the FPH website (http://fph.org.uk/prof_standards/downloads/cpd/CPD_reflective_notes.pdf).

The auditee should **not** send:

- Full minutes of meetings
- Notes taken during the activity
- Full papers or articles written, read or studied by the auditee
- Attendance lists
- Supporting documents.

What are the audit thresholds?

The auditor will assess the audit submission as 'satisfactory' or 'unsatisfactory'. **To achieve a satisfactory assessment all of the following requirements must be met:**

- the submission must be personally identifiable and must include the personal details form, PDP, CPD log, CPD annual return and a reflective note for each activity as described above;
- there must be a minimum of 50 credits, up to a maximum of 100 credits, each one covered by a reflective note;
- there must be a balance of types of activities as set out in the CPD credits menu – no single category should normally contribute more than 50 per cent of the credits claimed (see Appendix 2);
- reflective notes must have been assessed as good or fair for a minimum of 25 credits (see *How should a reflective note be structured* and *How are reflective notes assessed* sections);
- there must be a PDP or PDPs covering the relevant CPD year which is being audited (ie the previous calendar year);
- there must be a minimum of 25 credits directly related to the PDP;
- any disparity between credits claimed in the annual return and those recorded in the CPD log must be less than 10%.

What is the purpose of reflective notes?

Reflective notes are considered to be the most discriminating form of evidence of effective CPD. The time taken to reflect systematically on learning is more likely to embed the learning within subsequent practice. Although reflective notes are intrinsically subjective in nature, their completion can provide a form of quality assessment.

How should a reflective note be structured?

A reflective note should be written for each CPD activity claimed and should contain the following five elements:

- 1 Why was I there?
- 2 What was useful for me?
- 3 What were the most important things I learnt?
- 4 What is the most important thing for me to do as a result of this activity (include future learning needs and how to address them)?
- 5 How will the learning gained influence or change my practice?

It is important that a response is provided for each of the above five elements in each reflective note. This will make the reflective note a useful learning tool and will assist if your CPD return is selected for audit.



How are reflective notes assessed in the audit

The auditor will count the number of completed elements in each reflective note (excluding N/A or other meaningless responses) and provide an objective assessment of each reflective note based simply on the number of elements completed:

Number of completed elements	Assessment
5	Good
4	Good
3	Fair
2	Fair
1	Poor
0	Poor

Subjectively the auditor may be able to ascertain from the content of responses to each of the five elements whether there is an indication that the individual found the activity of benefit to their public health practice. Responses which are of limited value (for example: N/A or other meaningless responses) should lead the individual to question the value of the activity for their continuing professional development.

How will feedback be provided?

After the CPD Co-ordinators have assessed the audit material and the audit process has been completed (see *When will the audit be carried out* section), the CPD Director (via the CPD Administrator) will send each auditee a copy of the audit checklist form as completed by the auditor. The following information will be provided:

- the number of CPD credits for which the Co-ordinator has evidence (and this will be the number accepted by FPH for the return – ie an individual's CPD database record will be amended if the number of credits is different);
- the number of activities supported by reflective notes;
- the number of activities relevant to the PDP; and
- a summary of the quality of the audit submission, based on the agreed thresholds outlined below.

The constituency CPD Co-ordinator will also give oral feedback or discuss the audit return more informally if requested by the auditee following receipt of the written feedback.

What are the consequences of unsatisfactory, late or non-return?

Following an unsatisfactory or absent audit submission the auditee's CPD certificate will be endorsed accordingly (see *How will the audit be conducted* section) and the auditee will be entered automatically into the next year's audit.

Those who fail to submit an audit or whose audit submission is unsatisfactory for a *second* consecutive year will normally have the same sanction applied and be warned of the serious consequences of continued failure to comply (eg removal of good standing status, eventual removal from the FPH register of members, ineligibility for revalidation by either relicensing or recertifying).

Those who fail to submit an audit or whose audit submission is unsatisfactory for a *third* consecutive year will normally have their good standing status removed and will ultimately have their name removed from the FPH register of members. This will mean, amongst other things, that they will be ineligible for revalidation by either relicensing or recertifying.

This information will be available to prospective employers and the public on request. As part of revalidation, it is likely that there will need to be a formal mechanism to provide CPD status information to the GMC, GDC, UK Public Health Register, and any other registering bodies.

Where can I get more help?

Those concerned that they could find this process difficult or need further guidance should access the FPH CPD web pages (http://fph.org.uk/prof_standards/cpd/default.asp) or discuss with their constituency CPD Co-ordinator. The FPH CPD Administrator, Director and Deputy Director are also available for advice. All contact details are on the FPH website (http://fph.org.uk/about_faculty/faculty_advisors/Faculty_Advisors.asp).

The auditee may also wish to seek guidance from his/her professional appraiser. If the auditee is not in a professional appraisal system or has not developed a personal development plan agreed with their professional appraiser and employer (where appropriate), he/she should seek advice as above.

Appeals mechanism

To be devised and agreed (*to be in line with other FPH appeals processes*).

Warning

In the unlikely event that any auditee is found to be deliberately misleading FPH or falsifying records, he/she may be referred to the FPH Board for misconduct in accordance with Standing Order 15 and, depending on the outcome, to his/her registering body (eg GMC, GDC, UKPHR).

The FPH CPD audit policy and guidance will be kept under review and further amended as needed over time.

Appendix 1

Audit checklist form for CPD returns

For completion by the auditee when sending audit submission AND CPD Co-ordinators when auditing a sample CPD record.

Please complete the AUDITEE column of this form and return it together with your audit submission.

A copy of this form (including the auditor's comments on the next page) will be sent back to the auditee as part of the feedback at the end of the audit cycle.

CPD year: <input type="text"/>		AUDITEE	AUDITOR
Full name of auditee: <input type="text"/>		Please tick if enclosed	Delete as appropriate or insert figure
Date of audit: <input type="text"/>			
1	Is there a copy of Personal Details Form (Portfolio Section 1)?		Y / N
2	(i) Is there a copy of Personal Development Plan covering the relevant CPD year (Portfolio Section 2 or alternative format)?		Y / N
	(ii) Is PDP dated?		Y / N
	(iii) Does PDP relate to year of activities being audited?		Y / N
	(iv) Has PDP been agreed with a professional appraiser?		Y / N
	(v) Is there a minimum of 25 credits directly related to the PDP?		Y / N
3	(i) Is there a copy of the CPD log (Portfolio Section 3)?		Y / N
	(ii) Number of credits claimed in CPD log		
4	(i) Is there a copy of the CPD annual return (Portfolio Section 4)?		Y / N
	(ii) Number of credits claimed in CPD annual return		
5	(i) Number of credits supported by a good quality reflective note	N / A	
	(ii) In general, is the quality of the reflective notes submitted truly reflective? (0/1 = poor, 2/3 = fair, 4/5 = good)	N / A	
	(iii) Is there a minimum of 25 credits covered by a reflective note that have been assessed as good or fair?	N / A	Y / N
6	Is there a balance of types of activities?	N / A	Y / N
7	Overall is this submission satisfactory? <i>[Should ideally include: minimum 50 credits, all covered by a reflective note (of which a minimum of 25 credits must have been assessed as good or fair), a PDP covering the relevant CPD year (of which a minimum of 25 credits must be directly related to the PDP), a balance of activities as set out in the CPD credits menu and an annual return/log disparity of less than 10%]</i>	N / A	Y / N

Comments from the auditor:

(Balance of activities, future advice, relevance of CPD, quality of paperwork, general advice for future improvement)

Secondary CPD Co-ordinator's comments *if graded unsatisfactory:*
(including general advice for future improvement)

CPD Director's comments *if required:*

Appendix 2

The CPD credits guide

- 1** As a guide, count 1 credit per hour of **'real educational time'**, 3 credits for half a day and 5 credits for a full day.
- 2** To remain in good standing, those FPH members who are in active public health practice are required to complete **a minimum of 50 credits per year (up to a maximum of 100)** unless the FPH has formally exempted them from this requirement. Gaining more credits does not necessarily equate with better learning or higher quality of practice.
- 3** For each activity you should write a **reflective note**, which need not be long and should refer to learning points.
- 4** Activities should be linked to your **personal development plan** wherever possible.
- 5** When deciding whether an activity is suitable for inclusion in your CPD log, the critical consideration relates to individual **learning** having taken place.
- 6** **There is no requirement for any activity to be formally accredited.**
- 7** You should record **each activity** in the log and record a reflective note of the activity which should include the following five elements:
 - i Why was I there?
 - ii What was useful for me?
 - iii What were the most important things I learnt?
 - iv What is the most important thing for me to do as a result of this activity (include future learning needs and how to address them)?
 - v How will the learning gained influence/change my practice?
- 8** There should normally be a balance across a **range of activities**, but it is not necessary that all categories are represented. Categories of activities (non-exhaustive) which may include new learning are:
 - a. Learning as part of your job
 - b. Group work, seminars and journal clubs
 - c. Conferences, workshops and educational meetings
 - d. Formal courses
 - e. Private study and reading
 - f. PH audit, appraisal and reflective practice
 - g. Training, teaching, examining and preparation time
 - h. Research
 - i. Organisational development activities
 - j. Inspection and review activities.

The CPD credits guide

- 9 No single category (a-j as before) should normally contribute more than **50%** of the credits claimed.
- 10 **Private reading** should form no more than 20% of the total claimed and should be supported by a reflective note.
- 11 Publications and preparation under category 8h is allowed up to a maximum of **five hours** for each item.
- 12 **Certain major pieces of work**, such as the writing of books, external courses and higher degrees, may be apportioned across the categories and spread over a period of more than one year.
- 13 Before claiming credits for any CPD activity, consider:
 - Were there learning points?
 - Have I recorded this in a reflective note?
 - How is the activity linked to my PDP?



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