

Response to the General Chiropractic Council's consultation, A fresh approach to Continuing Professional Development

June 2019

1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care (the "Authority") promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and registration of people working in health and care. We are an independent body, accountable to the UK Parliament. More information about our work and the approach we take is available at: www.professionalstandards.org.uk
- 1.2 As part of our work we:
- Oversee the nine health and care professional regulators and report annually to Parliament on their performance
 - Accredit registers of healthcare practitioners working in occupations not regulated by law through the Accredited Registers programme
 - Conduct research and advise the four UK governments on improvements in regulation
 - Promote right-touch regulation and publish papers on regulatory policy and practice.
- 1.3 We welcome the opportunity to respond to this consultation from the General Chiropractic Council (GCC) seeking feedback on the proposed revised Continuing Professional Development (CPD) summary form that registrants are asked to complete annually.

2. General comments

- 2.1 We are pleased to see that the GCC is now meeting its commitment to take forward work on its CPD processes. We also appreciate the difficulties the GCC has faced in making changes to its regulations generally and including those governing CPD, meaning that the GCC has been unable to move to its preferred new system developed further to a cycle of research and consultation.
- 2.2 Although we have not responded to the individual consultation questions, our specific comments relate mainly to the first, third and sixth questions of the consultation document.

3. Specific comments

- 3.1 We note that – on the draft second summary sheet – registrants are not explicitly required to describe how their activities have benefitted patients and

service users. It is not clear either how or if patients and service users have contributed to the development of this proposed approach prior to consultation. We would be interested to know the outcome of the anticipated engagement with patient organisations during the consultation phase, as well as how the GCC will ensure that registrants demonstrate how their CPD contributes to improving care¹.

- 3.2 In its CPD guidance for 2018/2019, the GCC encourages registrants to engage in an objective activity in which they gain feedback from other sources on what they are doing. The GCC also encourages registrants to have a structured discussion about their CPD with someone else to support them in reflecting on their learning and development and applying it to their practice. It will be important to be clear in any updated guidance to registrants how this proposed fresh approach to CPD interacts with these two elements, which are planned to become requirements in the future.
- 3.3 From the consultation document, it is unclear what the evidence base is – including any assessment of risks associated with the practice of chiropractic – for supporting the statement that this is a proportionate approach to continuing professional development. It is understood that the desired mandatory requirement for specific areas of CPD (which may be determined by risks in chiropractic) cannot be made under the present regulations. However, we note that – in the current guidance – registrants are being encouraged to undertake the two other desired mandatory activities until such time as they become requirements. We wonder if any consideration has been given to alerting registrants to areas of risk, which may include conduct as well as competence, in the meantime?
- 3.4 The feedback you receive on Question 4 of the consultation document will be key to understanding whether or not the requirement of 100 to 250 words is sufficient for gaining adequate evidence of impact on quality of care. We will be interested to know how the GCC plans to monitor the impact of the scheme and measure its success, in particular how the statements will be assessed in practice.

4. Further information

- 4.1 Please get in touch if you would like to discuss any aspect of this response in further detail. You can contact us at:

Professional Standards Authority for Health and Social Care
157-197 Buckingham Palace Road
London SW1W 9SP

Email: policy@professionalstandards.org.uk
Website: www.professionalstandards.org.uk
Telephone: 020 7389 8038

¹ The first GCC consultation question refers to the goal of ‘improving care.’