

GENERAL DENTAL COUNCIL

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regulating the dental team



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GDC Consultation

What are your views on our proposed rules for the dental care professional CPD scheme?

The deadline for responses is **5.00pm on Friday 16 May 2008**

Please reply to:

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CPD for DCPs rules consultation
General Dental Council
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London
W1G 8DQ

You can also reply by email to: mloose@gdc-uk.org

This consultation pack contains:

- an explanation of some terms you will find in the consultation;
- some background information explaining what we are consulting on and why;
- consultation questions;
- Annex A – our CPD policy;
- Annex B – what we will do with your consultation response.

Explanation of terms used in this consultation

Dental care professionals (DCPs) - we register six categories of dental care professional as well as dentists. These groups are:

Dental nurse – provides clinical and other support to other registrants and patients.

Orthodontic therapist – carries out certain parts of orthodontic treatment under prescription from a dentist.

Dental hygienist – helps patients maintain their oral health by preventing and treating gum disease and promoting good oral health practice.

Dental therapist – carries out certain items of dental treatment under prescription from a dentist.

Dental technician – makes dental devices including dentures, crowns and bridges, to prescription from a dentist or clinical dental technician. Also repairs dentures.

Clinical dental technician – provides complete dentures direct to patients and other dental devices on prescription from a dentist. Clinical dental technicians are also qualified dental technicians.

Continuing professional development (CPD) – means training which:

- comprises lectures, seminars, courses, practical sessions, individual study or other activities undertaken by a dental care professional;
- can reasonably be expected to advance professional development as a dental care professional; and
- is relevant to the individual's practice or intended practice.

CPD cycle – this means a period of five years beginning on the date on which a dental care professional is first required to undertake CPD and each subsequent period of five years thereafter.

CPD requirement - this means the requirement to complete 150 hours of CPD, of which at least 50 hours of which must be verifiable CPD, in each CPD cycle.

CPD year – this means a period of 12 months beginning on 1st August in any calendar year.

Period of grace – this means a single period of six months, after the end of a CPD cycle, in which a dental care professional may undertake to complete any outstanding CPD due in respect of the previous CPD cycle.

Register – this means the dental care professionals register.

Verifiable CPD – this means CPD, participation in which can be verified by a third party and which has

- clear aims and objectives;
- clear anticipated outcomes; and
- quality controls.

What are your views on our proposed rules for the dental care professional CPD scheme?

Background

This consultation seeks views on the content of the procedural rules for our dental care professionals' continuing professional development scheme. We welcome the views of the dental care professionals who will be participating in the scheme, in addition to comments from anyone else with an interest.

This is **not** a consultation on the policy itself – we have consulted on that already; the policy we are going to implement is attached at Annex A. However, the Council must make rules before the scheme can come into force and we are seeking your views on the procedural aspects of these. The DCP scheme is expected to operate in exactly the same way as the dentist scheme.

Summary of what the rules would cover:

CPD record

It has already been agreed that all dental care professionals would have to keep an up to date record of CPD completed during a CPD cycle, and it would contain:

- a description of each item of CPD completed, and whether it is verifiable or non-verifiable CPD;
- the number of hours for each item of CPD; and
- evidence of each item of verifiable CPD.

It is proposed that the CPD record should be **retained for five years** from the end of the CPD cycle and must be provided to the GDC if we ask to see it. It is also proposed that:

- if we ask to see it, it must be provided **within 28 days**;
- if we do not receive it within that period, or it does not contain the information that we require, we would send a final warning;
- the final warning would state that the required information must be provided **within 14 days**, otherwise we may decide to remove the person's name from the register.

1(a). Do you think that it is reasonable that CPD records should be retained for 5 years?

Yes No Don't Know (Please tick the box which applies)

Please give reasons for your answer

1(b). If we ask to see the CPD record, we would expect it to be provided within 28 days. Do you think this is a reasonable time limit?

Yes No Don't Know (Please tick the box which applies)

Please give reasons for your answer

1(c). Following a final warning, we would expect to receive the CPD record within the next 14 days. Do you think this is a reasonable time limit?

Yes No Don't Know (Please tick the box which applies)

Please give reasons for your answer

CPD annual return

It has also been agreed that we would ask you to complete an annual CPD return by a specified date every year. We would require you to:

- state the total number of CPD hours completed during the CPD year;
- state the total number of verifiable CPD hours and non-verifiable CPD hours; and
- sign and date the return.

If you do not provide the information that we require by the date specified, it is proposed that we would send a final warning that the required information must be provided **within 14 days**, otherwise we may decide to remove your name from the register.

2. We would ask you to provide an annual CPD return every year by a specified date. If we do not receive it and we have to send a final warning, we would expect you to provide it within 14 days. Do you think this is a reasonable time limit?

Yes No Don't Know (Please tick the box which applies)

Please give reasons for your answer

Evidence at the end of the CPD cycle

As explained above, we may decide to remove your name from the register if you do not comply with a final warning about your CPD record or your annual returns. If you do provide the CPD record and annual returns, but we are not satisfied at the end of a particular CPD cycle that you have complied with the CPD requirement, we would send a notice that would:

- state why we are not satisfied; and
- invite you to submit further evidence or agree to complete the outstanding CPD for the CPD cycle within a period of grace – it is proposed that the evidence or agreement must be provided within a specified period (**of at least 28 days**).

If we consider further evidence provided by you and are not satisfied that you have met the CPD requirements, we may decide to remove you from the register.

If you have agreed to complete the outstanding CPD in a period of grace it is proposed that you must provide evidence of that **within 7 days** of the end of that period of grace. If you fail to do that or we are not satisfied that you have completed the outstanding CPD we may decide to remove you from the register.

If you fail to either provide us with further evidence or agree to undertake outstanding CPD during a period of grace by the date specified we may decide to remove you from the register.

3(a). If you have provided a CPD record and annual returns, but we are not satisfied at the end of the CPD cycle that you have met the requirements, we would allow you at least 28 days to either submit evidence that you have complied, or to agree to complete any outstanding CPD during a period of grace – is 28 days reasonable?

Yes No Don't Know (Please tick the box which applies)

Please give reasons for your answer

3(b). If you agree to undertake the outstanding CPD in a period of grace we would require the evidence to be produced within 7 days of the end of that period. Do you think 7 days is reasonable?

Yes No Don't Know (Please tick the box which applies)

Please give reasons for your answer

Period of grace

It is proposed that a period of grace would begin when we send a notice asking you to agree to complete the outstanding CPD in such a period. CPD undertaken in a period of grace would count only towards the requirements for the **previous** CPD cycle.

4. Do you think it is reasonable that there should be a six month period of grace at the end of the CPD cycle?

Yes No Don't Know (Please tick the box which applies)

Please give reasons for your answer

Restoration to the register

If you have been removed from the register for failure to comply with the CPD requirements, any application to restore to the register must include evidence that you have:

- completed any outstanding CPD for the cycle in respect of which your name was removed from the register; and
- completed at least 30 hours of CPD (of which at least 10 hours must be verifiable CPD) for each whole CPD year after the end of that cycle (up to a maximum of 150 hours, of which at least 50 hours must be verifiable, in the last five years)

We would notify you of our decision within four months of receiving the necessary information. If we were not satisfied that you had complied with the CPD requirements, it is proposed that we would write to you to:

- state why we are not satisfied; and
- invite you to submit further evidence relating to those matters (within a period of **at least 28 days**).

If your name was removed from the register for reasons other than failure to comply with the CPD requirements, we would ask you for the same evidence, unless you are restoring to the register less than a year after your name was removed **and** in the same CPD cycle.

5. If we are not satisfied that you have met the CPD requirements to restore to the register, we would allow at least 28 days for you to provide further evidence – is 28 days reasonable?

Yes No Don't Know (Please tick the box which applies)

Please give reasons for your answer

Decisions to remove you from the register

Throughout this document we have said that 'we may decide to remove you from the register' for failing to comply with the CPD scheme. If we decide to remove you from the register you will have a right to appeal against that decision. The Registrar would write to notify you of the decision. This would include the reasons why you have been removed. You would then have 28 days to appeal this decision. You may be able to extend the 28 day period if you are not informed of the decision within 14 days of the Registrar's decision to remove you. Your appeal will be considered by the Registration Appeals Committee. If you are not satisfied with their decision you may also appeal to the County Court or if you are in Scotland to the Sheriff Court.

This right of appeal is in primary legislation (the Dentists Act) and is therefore not part of this consultation.

Who are you?

Thank you for taking the time to reply to this consultation. To help us to understand the context of your response, please indicate the perspective from which you are replying.

I am replying as a (please tick the boxes that apply to you)

- | | |
|--|--|
| Member of the public | <input type="checkbox"/> |
| Dental professional (please tick the box which applies to you below) | |
| Clinical Dental Technician | <input type="checkbox"/> |
| Dental Hygienist | <input type="checkbox"/> |
| Dental Nurse | <input type="checkbox"/> |
| Dental Technician | <input type="checkbox"/> |
| Dental Therapist | <input type="checkbox"/> |
| General Dental Practitioner | <input type="checkbox"/> |
| Orthodontic Therapist | <input type="checkbox"/> |
| Specialist | <input type="checkbox"/> |
| Dually qualified | <input type="checkbox"/> (Please specify)..... |
| On behalf of an organisation | <input type="checkbox"/> (Please specify)..... |
| On behalf of an education provider | <input type="checkbox"/> (Please specify)..... |
| On behalf of a regulatory body | <input type="checkbox"/> (Please specify)..... |
| On behalf of a professional association | <input type="checkbox"/> (Please specify)..... |
| Other | <input type="checkbox"/> (Please specify)..... |

CPD policy

Introduction

1. This paper represents a composite statement of the Council's policy on CPD, for ease of reference¹. It incorporates decisions on the scheme taken since the original 'high level' policy paper was agreed by the Council in November 1999.

Reasons for the scheme

2. The public take it for granted that professionals should keep their skills up-to-date by undertaking CPD throughout their working lives. This is seen as particularly important in the case of doctors and dentists where failure to take account of changing knowledge could have an adverse impact on successful patient treatment and care.
3. The primary dental qualification represents only the first stage in an educational continuum which should last throughout a dental professional's practising life.
4. Compulsory CPD embodies elements central to the Council's role by seeking to promote high standards and ensure the protection of the public through the profession's commitment to dental education.
5. The government promoted the concept of clinical governance through documents such as *A first class service: Quality in the New NHS*. This sought to create an environment in which excellence in clinical care would flourish. In creating a compulsory CPD scheme, it was thought important that the dental profession embraced the concept of clinical governance and that compulsory CPD would be a valuable tool in achieving this. CPD is also thought to be an important component of revalidation.

Objectives of the scheme

6. Compulsory CPD is designed to:
 - ensure that all dental professionals update their knowledge and acquire new skills in order to benefit their patients and enhance the quality of their professional lives.
 - maintain public confidence in the Dentists and Dental Care Professionals Registers by ensuring that they are lists of dental professionals who have not only acquired the qualifications needed to practise but who also continually update their skills in order to give their patients the best possible treatment and care.

¹ Key historical reference documents in the development of CPD are: *Reaccreditation and Recertification for the dental profession – a consultation paper*, May 1997. *Lifelong Learning – recertification for the dental profession – the General Dental Council's policy*, November 1999 (Annex 1 to Item 3.2, Council meeting November 1999). *Lifelong Learning – taking dentistry forward*, 2000.

Core principles of the scheme

7. The Council agreed that in order to provide public protection, the scheme must be comprehensive, and so would be applied to all dental professionals on its registers.
8. There would be no exceptions to a requirement to carry out CPD. All dental professionals on the register are entitled to practise dentistry and so must necessarily keep up-to-date, whether or not a dental professional chooses to exercise the right to practice, or whether they choose to exercise that right on a full- or part-time basis.
9. In order to encourage participation, the scheme requirements must be simple and achievable.
10. The scheme must be sufficiently flexible not to disadvantage those whose personal circumstances may prevent them from meeting their CPD commitment for part of the CPD cycle (e.g. because of a career break, or family needs).
11. All dental professionals should have a broad-based continuing education, focussing their CPD on the needs of their patients. All members of the dental team are responsible professionals and should exercise judgement as to what will be useful CPD.
12. CPD activities do not have to directly relate to treatment; patients may benefit from a variety of non-clinical activities undertaken by dental professionals as part of CPD.
13. The Council will challenge a dental professional's view of what is useful CPD if it is not within the spirit of the CPD scheme.

The policy itself

The requirement

14. CPD is defined as “study, training, courses, seminars, reading and other activities undertaken by a dental professional which could reasonably be expected to advance his professional development as a dental professional”².
15. All dental professionals should ensure that the CPD they do is relevant to their practice. Dental professionals should determine the CPD they need to do through use of personal development plans.

Dentists

16. All dentists are required to complete and record 250 hours of CPD over each five-year cycle, with a minimum of 75 of the 250 hours being verifiable CPD. The remainder can be general (or non-verifiable) CPD.

² CPD Rules 2003, to be amended to incorporate DCP CPD requirements.

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17. Dentists are encouraged to complete 50 hours of CPD per year, including at least 15 hours of verifiable CPD.

Dental care professionals

- 18. All DCPs are required to complete and record 150 hours of CPD over each five-year cycle, with a minimum of 50 of the 150 hours being verifiable CPD. The remainder can be general (or non-verifiable) CPD.**
- 19. The overall total CPD required, and the number of verifiable CPD hours, has been set at a lower level for DCPs than for dentists for the first five-year CPD cycle. This is in acknowledgement of the relative lack of CPD provision for these groups in relation to dentists. The overall total and number of verifiable CPD hours required for DCP groups will be reviewed, in consultation with stakeholder groups, towards the end of the first five-year DCP CPD cycle³.**
20. The Council does not recommend that dental professionals front- or back-load their CPD e.g. by meeting the full hours requirement in one year and then not undertaking any CPD for four years, as this would not demonstrate that the dental professional had kept up to date throughout the cycle.
21. CPD is only verifiable CPD if it meets all four of the following conditions:
1. The dental professional must get and keep a certificate (or other type of documentary proof) proving that (s)he took part in the activity. The certificate should come from the activity provider or organiser, and should show the number of hours you spent on the activity;
- The activity itself must have:
2. concise educational aims and objectives – the activity should have a clear purpose or goal;
 3. clear anticipated outcomes – the dentist should know what (s)he can expect to gain as a result of taking part in the activity; and
 4. quality controls – the dental professional should have the chance to give feedback, with a view to improving quality.
22. The dental professional must use his/her professional judgement to decide whether or not an activity meets all four of the above conditions for verifiable CPD. There is no such thing as automatic verifiable CPD.
23. New entrants to the dentist register begin their first CPD cycle on 1 January in the year after they first become registered. New entrants to the DCP register will begin on 1 August following registration.

Core CPD subjects

³ The first CPD cycle will begin on 1 August 2008 for all DCPs registered on the 31 July 2008.

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24. All dental professionals should undertake CPD in core subjects as part of their verifiable CPD minimum requirement, as follows:
- medical emergencies (10 hours per CPD cycle)
 - disinfection and decontamination (5 hours per CPD cycle)
 - radiography and radiation protection (5 hours per CPD cycle) (dental technicians may substitute 5 hours CPD per cycle in materials and equipment for radiography and radiation protection if they wish to do so, since their curriculum does not require them to meet specific competencies in relation to dental radiology and imaging).
25. These core subjects have been chosen because, even if a dental professional chooses not to exercise their right to practice, if (s)he is on the register (s)he should be able to advise on these issues.
26. It is recommended that dental professionals do CPD in medical emergencies annually.
27. The Group also recommends that dental professionals in a practice or laboratory environment should undertake CPD so that they are up to date on:
- a. legal and ethical issues;
 - b. handling complaints
28. Dental professionals working in these environments have a responsibility to be familiar with these issues, whether or not they are in a position to control or influence the practice, business or arrangements within which they work.

Applicants for restoration

29. Dental professionals who take time off the register have to do CPD if they plan to return to the register in the future.
30. Applicants for restoration have to show evidence that they have completed a certain amount of CPD to be allowed to rejoin the register.
31. A dental professional's CPD cycles keep running whether or not (s)he is on the register. To rejoin the register, an applicant for restoration has to show evidence that (s)he has completed CPD from the beginning of the CPD cycle in which (s)he left the register, until the date of his/her application to rejoin the register. For dentists, this should be at an average rate of 50 hours of CPD (of which at least 15 are verifiable CPD) each year. For DCPs, this should be at an average rate of 30 hours of CPD (of which at least 10 are verifiable CPD) each year.
32. For example:
- if a dentist is two years into his/her first CPD cycle and takes two years off the register to work abroad, (s)he will need to show that (s)he has done

four years' worth of CPD – 200 hours (50x4) of which 60 (15x4) are verifiable CPD – before (s)he can rejoin the register.

- if a DCP is two years into his/her first CPD cycle and takes two years off the register to work abroad, (s)he will need to show that (s)he has done four years' worth of CPD – 120 hours (30x4) of which 40 (10x4) are verifiable CPD – before (s)he can rejoin the register.

33. If a dental professional is off the register for one year or less (s)he will not have to show any CPD evidence to rejoin the register, unless (s)he comes off the register in one CPD cycle and applies to rejoin it in the next. If (s)he does this, (s)he will have to show that (s)he has done the CPD needed for the whole of the CPD cycle in which (s)he left the register. In other words, a dentist would have to show that (s)he had done 250 hours of CPD (of which 75 were verifiable CPD), and a DCP would have to show that (s)he had done 150 hours of CPD (of which 50 were verifiable CPD).
34. If a dentist is off the register for five years or more, (s)he will have to show that (s)he has completed 250 hours of CPD (of which 75 hours are verifiable CPD) in the five-year period ending on the date of his/her application to rejoin the register.
35. If a DCP is off the register for five years or more, (s)he will have to show that (s)he has completed 150 hours of CPD (of which 50 hours are verifiable CPD) in the five-year period ending on the date of his/her application to rejoin the register.

Temporary registrants

36. A dental professional who has temporary registration is required to do CPD just like any other dental professional. Each time the dental professional applies for a further period of temporary registration, for CPD purposes the application will be treated as if the person is seeking restoration. This means that before further temporary registration is granted the person will have to show that (s)he has completed the CPD that a person being restored would have to complete.

Measuring compliance

37. After the end of each year in the five-year cycle, the Council will send the dental professional a CPD annual return statement to fill in stating the number of CPD hours (both verifiable and general) (s)he has completed in the previous year.⁴
38. Failure to return a statement will generate a reminder letter from the Registrar.
39. A dental professional may be erased by the Registrar if it appears to the Registrar that (s)he has not complied with the CPD requirement. Prior to erasure, a dental professional may give an undertaking to complete any outstanding CPD due within a six month 'period of grace'.

⁴ The policy of requiring an annual return statement is currently being reviewed. A decision would need to be made on this before the end of the year in order that any change could be incorporated into the CPD rules (to be revised to include DCP CPD requirements) by July 2008 (the date the CPD scheme for DCPs is due to come into effect).

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40. The Council may require any dental professional to send in his/her full CPD records (including documentary proof of verifiable CPD) on demand.
 41. At the end of each five-year cycle, the Registrar will write to any dental professional who has declared less than the required number of hours of CPD indicating that the dental professional will be erased from the register. The dental professional may make representations and provide evidence against this if (s)he has in fact done the CPD. Alternatively, the dental professional may undertake to complete any outstanding CPD within a period of grace as described at paragraph 39 above.
 42. A number of dental professionals who appear to have met the requirement on the evidence of the annual return statement will be selected at the end of their five-year cycle at random for compliance monitoring. The percentage of dental professionals monitored in this way will vary from year to year.
 43. CPD done in a 'period of grace' will count only towards the CPD cycle for which there is a deficit. It will not count towards the CPD cycle in which it is actually completed.
 44. Once a 'period of grace' has expired, the dental professional must provide the Registrar with evidence of the CPD (s)he has completed within that period.
 45. There is a right of appeal to the Registration Appeals Committee against erasure for non-compliance with the CPD requirements. There is also a right of appeal to the Registration Appeals Committee against refusal to restore to the register for non-compliance with the CPD requirements.

Quality assurance of educational provision

46. The Council will not recommend or accredit specific courses or educational providers for CPD. We are keen to encourage innovation in the provision of CPD, not stifle it by imposing further criteria that would have to be met for a course to be 'GDC approved'.
47. One of the educational criteria for verifiable CPD is that dental professionals should be able to make their opinions about the course known. Therefore, if a dental professional attends a course that (s)he feels is of a poor standard, (s)he will be able to make this known to the course providers so that it can be improved. Dissatisfaction with the course would not render it ineligible as CPD.
48. CPD undertaken abroad and/or for other schemes (such as royal college schemes) may be counted towards the compulsory CPD scheme. However, dental professionals will need to check that the criteria are met for any activity they wish to count as verifiable CPD.
49. Periods spent on registration or breaks, or non-educational activity at, for example, trade shows and conferences, should not be included in the CPD hours for an activity.

Start-dates

50. With the exception of dentists on our registers at 1 January 2002 (who were divided into tranches for the purposes of beginning compulsory CPD), a dentist will begin his/her first CPD cycle on 1 January in the year following the year in which (s)he first registers;
- 51. All DCPs on our DCP register at 31 July 2008 will begin their first CPD cycle on 1 August 2008;**
- 52. Any DCP who first registered with us prior to 31 July 2008 but who is not on the register at 31 July 2008 will begin their first CPD cycle on 1 August 2008;**
- 53. All DCPs who first register with us on or after 1 August 2008 will begin their first CPD cycle on the following 1 August after which (s)he first registers.**

What we will do with your consultation response

- **When you send your response** we will provide you with an acknowledgement;
- **Once the consultation has closed** we will collate all the consultation responses we have received by the deadline and staff in the Quality Assurance team at the GDC will carry out a consultation analysis and produce a report for the Council to consider. Please note that:
 - we cannot consider responses that address the content of the CPD policy itself. We have already consulted on the policy issues – this consultation will only address the content of the rules.
 - we cannot guarantee that consultation responses received after the stated deadline will be considered.
 - we do not put single responses (whether sent on behalf of organisations or individuals) before the Council on request, whether or not they are addressed to the Council, its individual members, or committees, so please do not ask us to. It is important that, as a public body, our consultation process is transparent and fair to all our stakeholders, and so we will reflect the whole range of comments made in the responses we receive in the consultation report itself.
 - Please note that a consultation process is not a 'vote'. We make decisions based on public protection, and not a simple count of the number of views expressed for or against a particular approach, although we will take that into consideration.
- **5 June 2008** – The Council will consider the rules, along with the consultation report, which will also be published on our website.
- **1 August 2008** - The CPD scheme for dental care professionals will come into force.