

JCCP – Practitioner Register Annual sampling procedure for workplace premises standards and CPD

Introduction

The JCCP is required by the PSA to sample its registrant members annually to ensure that self-reporting returns provided by registrants complies with both JCCP published workplace premises and CPD standards. It is the Practitioner Register Committee's (PRC) responsibility to create, maintain and monitor the process by which this requirement is achieved. Registrants included in the sample, once identified, will be required to upload evidence to confirm that they meet key JCCP requirements. In order to provide assurance this process is robust the sample must be representative of the whole register and its constituent parts.

The Professional Standards Authority Standard 10d prescribes this requirement:

'Requires registrants to keep their practice up to date and checks at appropriate intervals that registrants continue to meet its standards. In deciding its arrangements the organisation takes account of:

- *The pace and extent to which professional practice is subject to change (for example, technological advancements or research based findings);*
- *The nature and extent of risk registrants' practice poses to service users and the public. (PSA Standards for Accredited Registers)*

The PRC is committed to ensuring that the following procedure is implemented with effect from April, 2019.

Overview & Principles

- The objective is to provide a sample that reflects the whole register and to determine a process for obtaining the relevant evidential data required from this sample to provide assurance of compliance with both JCCP and PSA standards .
- Sampling is not concerned in any way with proof or assessment of competence. It does not seek to monitor or observe fine detail but must be considered within the context of a broader sense of seeking evidence from Registrants of their compliance and adherence to requisite standards as part of an ongoing process of independent audit.

The Sample

The following principles have been agreed:

- The JCCP has agreed that 5% represents a robust sample size.
- Sampling will be performed randomly in order to be representative, and to cover our requirements to monitor risk
- Sampling will be applied equally to both parts of the Practitioner Register i.e. 5% from part A and 5% from part B.
- Due to the fact that it is possible that any given sample size, as a percentage, would not yield a round number overall sample numbers will be rounded appropriately.
- The sample will be selected annually and randomly in an objective, fair, open and transparent manner in partnership between the Chair of the JCCP PRC and the JCCP's contacted register management company.
- The sample will be identified in April of each year and will be selected from a pool of all registrants who have been registered with the JCCP for a minimum of one year at the time of the audit.

- Each Registrant who is selected for inclusion in the sample will be written to and provided with three month's-notice of the date by which they are required to submit supporting evidence of their previously submitted self-declaration of compliance with the JCCP's CPD and workplace Premises standards.
- The core requirements for sampling relate to annual self-certification returns for **CPD, logbook of treatment numbers** and for **workplace premises** standards.
- All evidence submitted by registrants in support of their self-declared compliance with the JCCP's CPD and workplace Premises standards must be verified by the Registrant's named Supervisor or by a named professional peer.
- Any evidence provided to support self-declared compliance with the JCCP standards must not include patient identifiable information.
- The JCCP Practitioner Register Committee (PRC) will convene a panel of constituent members (supplemented by expert members from the JCCP Fitness to Practise Panel as required) to consider evidence submitted by Registrants included in the annual sample and make recommendations regarding the same. The Chair of the PRC will provide an annual report to the JCCP Board of Trustees on the outcome of this process.

The CPD Sample and Evidence Base

Registrant self-declaration of their CPD will be assessed in accordance with individual registrant compliance with defined and prescribed JCCP/CPSA CPD criteria as set down for the for each of the modalities/treatment categories that are registered by the JCCP. The following example provides an illustration of the benchmark standards that the JCCP will apply to the sample by way of the following CPSA standard for CPD – *Botulinum Toxin Injections*:

- ❖ *Practitioners must demonstrate continued professional development (CPD).*
- ❖ *Practitioners must demonstrate evidence of CPD achievements that they have included in their 'appraisal'/revalidation' as required by their respective Professional Statutory Regulatory Body (if required to do so).*
- ❖ *All practitioners must be held to account to the same standard, irrespective of professional background.*
- ❖ *A minimum of 50 hours CPD must be demonstrated annually by all clinicians of which a core element is aesthetic.*
- ❖ *All practitioners must provide evidence that they have completed the minimum number of hours practised in each modality for which they are registered with the JCCP as required and set down by the CPSA e.g. a minimum of 40 completed treatments as evidenced in their practice log books.*
- ❖ *All practitioners who wish to organise or teach on courses should meet The JCCP Education and Training Standards which are cited on the JCCP website entitled 'The JCCP Education and Training Providers Register Standards' - Teaching, research, management and leadership can also be included as part of CPD'.*

The Evidence Base for CPD and appraisal

Practitioners must perform 50 hours of CPD per year, of which 20 hours need to be external to the Registrant's own practice base or self-directed learning.

The following forms of evidence can be uploaded by JCCP Registrants to confirm their self-return for CPD compliance:

- ❖ *Conferences, workshops, seminars, external secondments, 'shadowing' or other related learning participation events (such learning events may be counted as 'external learning events');*
- ❖ *Teaching or leadership roles evidenced by documentary evidence to confirm engagement with the events cited;*
- ❖ *Self-Directed Learning in the form of: e.g. reading journals, e-learning, internal training, internal management or leadership events (these learning forms/events cannot be counted as 'external learning events');*
- ❖ *Independently verified CPD learning included in Professional Statutory Regulatory Body Appraisal or Revalidation process returns .*

The Process for CPD Audit

All registrants included in the annual sample will be required to upload, or otherwise provide evidence of having completed a minimum of 50 hours of CPD in the past twelve months that is relevant to the treatment modality for which they are registered with the JCCP. A minimum of the CPD hours cited must be externally accredited and equate to a minimum of 20 hours with the remaining 30 hours being internally self-directed.

All Registrants included in the sample will be required to provide a minimum written reflective statement of 500 words to describe how their CPD has assisted them to focus on and to improve their practice and to promote patient safety. This requirement will apply to both parts of the JCCP Practitioner register equally. The reflective statement should be signed and verified by the Registrant's named Supervisor or peer reviewer.

Treatment numbers

Registrants must provide evidence that they meet the required standard for their registered modality for the number of treatments they perform annually. Evidence is to be presented in the form of a logbook which should include all relevant treatments, including the dates those treatments were provided, until the minimum is met.

It is for the registrant's supervisor to provide a declaration that this logbook is a true and accurate reflection of the registrants practice. The measures a supervisor may wish to take to verify the accuracy of the logbook may, for example, include a review of the registrants diary and/or the patients notes, as appropriate.

The Workplace Premises Evidence Base and Audit Procedure

- All Registrants are required to self-assess annually with regard to their declared compliance against a checklist of published premises standards that include both generic and modality-specific standards.
- All registrants who are included in the JCCP annual sample will be required to provide independently verifiable evidence to support their self-declaration that they meet the JCCP workplace premises standards.
- For those Registrants whose premises are provided by a corporate 'Chain' employer documentary evidence may be submitted from the employer's Director of Clinical Governance (or other such designated person) to provide objective evidence that this standard is complied with regard to the Registrant's designated workplace/modality.

- For those Registrants whose premises are registered with the CQC documentary evidence may be submitted from this regulator to provide objective evidence that this standard is complied with regard to the Registrant's designated workplace/modality.
- For those Registrants whose premises are registered and inspected by Local Government Environmental Health Officers (EHO) documentary evidence may be submitted from the local EHO (or other such designated person) to provide objective evidence that this standard is complied with regard to the Registrant's designated workplace/modality.
- In the absence of, or in support of such independent verifiable evidence, the Registrant may submit photographic evidence to confirm that the JCCP workplace practice standards are complied with regard to the Registrant's designated workplace.
- All evidence submitted by registrants in support of their self-declared compliance with the JCCP's workplace Premises Standards must be verified by the Registrant's named Supervisor or by a named professional peer.

Other considerations

Responsibilities for the JCCP contracted **Register Manager (HFIS)** will include:

- The creation of the relevant sample objectively in accordance with the principles outlined earlier in this paper.
- Recording against the Registrant's name the registration date when evidence is required and submitted.

The responsibilities of the **JCCP Practice Register Committee** will be to:

- Monitor the efficiency and efficacy of the sampling process and make appropriate changes in accordance with JCCP Trustee and CPSA requirements.
- Ensure that members of the JCCP Practitioner Register Committee will be made available to review material/evidence submitted by Registrants should doubts or questions arise regarding submitted evidence or if non-compliance impinges on a Fitness to Practise case or associated matter.
- Convene a panel of constituent members (supplemented as required by expert members from the JCCP Fitness to Practise Panel as required) to consider evidence submitted by Registrants included in the annual sample and make recommendations regarding the same. The Chair of the PRC will provide an annual report to the JCCP Board of Trustees on the outcome of this process.
- Seek assurance that information included in the annual sample audit is robust and to undertake a thematic analysis on behalf of the JCCP to identify areas of best practice and to identify where improvements may be beneficial to the promotion of patient safety and public protection.
- Advise the JCCP CEO when Registrant non-compliance with the Council's standards is identified and to recommend appropriate action.

**Indicative Sampling Process
example: Flow diagram.**

