



Ag Rialáil Gairmithe Sláinte
agus Cúraim Shóisialaigh

Regulating Health +
Social Care Professionals

Continuing Professional Development Audit: Guidelines for Registrants

An Chomhairle um Ghairmithe Sláinte agus Cúraim Shóisialaigh
Health and Social Care Professionals Council

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Introduction

About CORU

CORU is Ireland's multi-profession health and social care regulator. It comprises the Health and Social Care Professionals Council and the Registration Boards established under the Health and Social Care Professionals Act 2005 (as amended).

CORU's role is to protect the public by promoting high standards of professional conduct, education, training and competence through statutory registration of health and social care professionals.

The designated professions under the Act are clinical biochemists, counsellors, dietitians, dispensing opticians, medical scientists, occupational therapists, optometrists, orthoptists, physical therapists, physiotherapists, podiatrists, psychologists, psychotherapists, radiation therapists, radiographers, social care workers, social workers and speech and language therapists.

The Health and Social Care Professionals Act (2005, as amended)

Section 27 (1) of the Health and Social Care Professionals Act states that *the object of the registration board of a designated profession is to protect the public by fostering high standards of professional competence among registrants of that profession.*

Section 27 (3)(c) states that one of the functions of a registration board is *to give guidance to registrants concerning ethical conduct and give guidance and support to them concerning the practice of the designated profession and continuing professional development.*

About this document

The information contained in this document is for general information purposes only. CORU reserves the right to make additions or modifications as required. This guideline document outlines the process of auditing registrants' records of engagement in continuing professional development required by your Code of Professional Conduct and Ethics.

This document should be read in conjunction with:

- Code of Professional Conduct and Ethics for your Registration Board
- Guidance on Continuing Professional Development for your Registration Board
- Support for Continuing Professional Development for your Registration Board

Continuing Professional Development Audit: Guidelines for Registrants

Your Code of Professional Conduct and Ethics requires that you ensure your knowledge, skills and performance are of a high standard, up to date and relevant to your practice and that you participate in continuing professional development (CPD) on an ongoing basis.

You should consider the CPD guidance and CPD support provided by your Registration Board and keep a record of your CPD.

Your Registration Board may audit this record of CPD to confirm that you have a system and process in place to ensure your knowledge, skills and performance are of a high standard. A random selection of registrants will be required to submit their CPD record evidencing a minimum of 30 CPD credits in every 12-month period.

Selection of registrants for audit

A representative percentage of registrants, from each profession, will be selected for audit following each 12 or 24-month cycle. Registrants will normally be selected in a random selection process.

The Registration Board reserves the right to undertake an audit of an individual's CPD records or to target a particular group of registrants at any time.

Audit schedule

CORU will publish the schedule for CPD audits for your profession. The audit period may be 12 or 24 months. You will be notified at the start of this audit period at least 12 months in advance of the audit for your profession.

The audit period is aligned to the date of renewal of your registration. The 30 CPD credits should be accrued in every 12-month period linked to your registration renewal date. Your Registration Board will notify you of your audit period and the date for which registrants may be called to submit their CPD record.

Eligibility for routine audit

Only registrants who have been on the register for the entirety of the audit period will be eligible for the routine audit. If a registrant joins the register for that profession mid-period he/she must commence their CPD without delay in order to be compliant with their Code of Professional Conduct and Ethics. They will not be eligible for audit until the end of the next CPD Audit period. The exceptions to this are where there is a targeted audit being conducted.

Requests for deferral

Registrants have a duty to engage in CPD for so long as they are on the register. However, we recognise that it may not always be possible to provide a record of your CPD for audit due to personal circumstance. These circumstances may include maternity/adoptive leave, career breaks, long term illness or other forms of statutory leave. Requests for deferral of an audit can be made and will be considered by your Registration Board on a case by case basis. Applications for deferral will be retained until the registrant has been deemed compliant with a CPD audit cycle. This may necessitate special category data being provided to CORU which will only be accessible to the relevant Registration Board and designated CORU staff.

If called for audit and you would like to request a deferral, please contact CORU as soon as possible to request a deferral application form. Those granted deferral by their Registration Board will automatically be selected in the next audit.

If your Registration Board decline your request for deferral, you will have 30 days to submit your CPD record.

CPD Record

If called for audit registrants must complete the CORU CPD Record Template. All sections of the CPD Record Template must be completed including a declaration and signature of the registrant. Digital signatures are acceptable if submitting your record by email.

CORU's CPD Record Template includes the learning activities you completed that achieved a minimum of 30 CPD credits of new or enhanced learning in every 12-month period. Your evaluation and reflection of the new or enhanced learning achieved and its impact on your practice, your review of learning needs for the next 12-month period and your planned learning activities for the next 12-month period.

Registrants must not submit original documentation as this will not be returned following review of your CPD record. All CPD records will be destroyed within 30 days following the decision of compliance by your Registration Board.

Confidentiality and Data Protection

Registrants must not disclose any information on their CPD record that could identify a service user. Your Code of Professional Conduct and Ethics requires that you respect the confidentiality and privacy of any third party.

No names or any other form of identifying information should be included in your record of CPD.

Your reflective practice on new or enhanced learning should reflect what you have learnt and how it has impacted your practice. It does not require any information to be disclosed about a colleague or other person.

Registrants are **not** required to submit supporting documentation for example certificates, case studies or minutes of meetings. CORU's CPD Record Template is the **only** document that we require registrants selected for audit to submit.

Registrants should however maintain supporting documentation as evidence of engagement in CPD, outside of any CPD audit requirement.

Plagiarism or False Declaration

Plagiarism is falsely attributing someone else's written or creative work, in whole or in part, as one's own without the appropriate acknowledgement.

Plagiarism applies not just to text, but to graphics, tables, formulae, or any representation of ideas in print, electronic or any other medium. This includes information taken from the internet. Registrants should be vigilant at all times to ensure that they avoid plagiarism. Registrants should also be aware that your Code of Professional Conduct and Ethics provides the standards applicable to undertaking research in an ethical manner.

Registrants must not provide a false declaration on their CPD record. Your Code of Professional Conduct and Ethics requires you to maintain accurate records.

Plagiarism or false declaration may be deemed as professional misconduct and thereby the registrant would be in breach of their Registration Board's Code of Professional Conduct and Ethics.

The CPD Audit Process

At the end of the CPD audit period, registrants who have been selected for audit will receive notification from CORU to submit their CPD Record. Registrants will normally have 30 days to submit their CPD Record.

Only registrants selected for audit will receive a communication about the forthcoming audit. Registrants will be able to submit their CPD Record either in hard copy or electronically before the deadline.

When the CPD Records are received at CORU offices they will be checked to ensure they contain the following information:

- The CPD learning activities you have completed in the previous 12 or 24-month audit period that demonstrate achievement of 30 CPD credits in every 12-month period,
- Your evaluation and reflection of the new or enhanced learning achieved and its impact on your practice for each learning activity listed. **It is important to remember that the more CPD credits you assign to a learning activity the greater the reflection of what new or enhanced learning you have achieved and its impact on your practice,**
- Your review of learning needs for the next 12-month period,
- Your planned learning activities for the next 12-month period, and
- A self-declaration form with your signature.

If information is missing, you will be contacted once and requested to resubmit your record with the required information. Registrants will only be contacted once for additional information. If a registrant fails to re-submit their CPD record with the required information, it is the decision of their Registration Board as to the further action that may be taken.

Your CPD record will be reviewed by members of the CORU Executive with expertise regarding CPD. The review of your record is to satisfy that you have a system and process in place to keep your professional skills and knowledge up to date. The audit only considers the record of your CPD. It is not a qualitative assessment of the activities you have selected to undertake.

The CPD Audit Outcome

A review of your CPD record could result in one of two outcomes. Either you are deemed compliant or non-compliant.

Registrants will be informed if they have been deemed to be compliant by their Registration Board. There is no scope for CORU or a Registration Board to give qualitative feedback on a registrants CPD record.

A registrant may be deemed non-compliant if they fail to engage with CORU having being selected for CPD Audit, fail to submit a CPD Record and have not been granted a deferral by their Registration Board or if there are concerns raised regarding their fitness to practise as a result of information disclosed on their CPD record.

If a registrant is deemed to be non-compliant, it is the decision of their Registration Board to consider if there has been a breach of their Code of Professional Conduct and Ethics.

Data Protection Information

CORU is committed to the principles of Data Protection. CORU's processing of personal data for audit purposes is necessary "for the performance of a task carried out in the public interest and in the exercise of official authority" as provided for in Article 6 (e) of the General Data Protection Regulation (GDPR), and also in compliance with the [Data Protection Act, 2018](#) and the [Data Sharing and Governance Act 2019](#). CORU's privacy statement is available [here](#).

CORU will use a registrant's personal data if selected for CPD audit.

Your:

- Name
- Registration number
- Contact Email Address
- Contact Address for Correspondence (only if there is no response to email)

will be used during the audit process. Only the CORU Executive will have access to this information. It is important that you have provided CORU with up to date contact information, as required under Section 45 of the Health and Social Care Professionals Act 2005 (as amended).

If selected for audit, you will be required to submit a record of your engagement in CPD. This should be submitted using the CORU CPD Record Template. The CPD record includes:

- Record of CPD Activity
- Learning outcome and impact on practice
- Review of learning needs and learning plan.

On the CPD record you must also include your:

- name
- declaration
- signature
- registration number.

This personal data is required to allow for identification of the record submitted.

A Registration Board will be given access to a CPD record if it is deemed non-compliant with its CPD requirements under the Code of Professional Conduct and Ethics.

In order to preserve confidentiality and ensure compliance with Data Protection you must not include service user name or any other confidential information relating to a service user or any other third party when submitting your CPD record. Do not disclose information which could allow a service user or others to be identified.

Following a Registration Board's decision of compliance, your CPD records submitted to CORU will be destroyed within 30 days. Applications for deferral will be kept until a registrant has been deemed compliant with a CPD audit cycle.

If deemed non-compliant, a Registration Board will consider a registrant's CPD record and/or communications with CORU to determine if this is a breach of their Code of Professional Conduct and Ethics.

Following the completion of audits CORU will review records submitted to compile audit trend reports. No personal data that could identify a registrant will be contained in an audit trend report.

[Sharing the personal data you provide during this process](#)

CORU will release personal data when we are required to do so by law. CORU will not provide personal data to third parties for their marketing purposes.

[Data processors](#)

CORU has contracts with suppliers (data processors) to carry out certain activities or services on our behalf. These can include providers of ICT support services and auditors. Sometimes in order to perform these services our suppliers require access to some of the personal data CORU holds.

Data Protection Rights

Some of these rights do not apply or may be limited where CORU uses personal data to enable us to undertake a task in the exercise of our official authority or in the public interest. For example, rights may be subject to restrictions in the following ways:

- Data Subjects' rights may be limited by the legal requirements in the Health and Social Care Professionals Act 2005 (as amended) which can include CORU's obligation to protect the titles designated in our Act or process complaints under Part 6 of the Act.
- CORU is using personal data to carry out our statutory functions, because there are strong public interest and patient/service user safety grounds for us to process personal information in order to carry out our role.
- Data Subjects' data protection rights may be restricted by the rights and freedoms of third parties.
- CORU has another legal or regulatory requirement to use personal information in a particular way.

Right of access

You can make a subject access request by writing to the Data Protection Officer using the details given [here](#) or by contacting DPO@coru.ie.

Right to rectification

You can request that CORU corrects your personal data if you believe the data that CORU holds is inaccurate. However this request must be made in writing and should explain the reason why you think the personal data is incorrect or inaccurate.

Right to erasure

Please note that the right to erasure under GDPR does not apply if the use of personal data is necessary to enable CORU undertake a task carried out in the exercise of our official authority or in the public interest.

Please note that the right to erasure is not an absolute right and CORU may decline a request where we have a lawful basis to do so. In the event that this occurs, we will explain our legal basis for so doing.

Right to restrict processing

If you raise a concern about our processing of your personal data, you can ask to restrict the way that CORU uses your data while we consider your concern. You must explain the reason for your concern in writing. For example it may be because you believe it is inaccurate or excessive. Please be aware that if our processing of personal data is restricted, CORU may still be able to store personal data if we have a lawful basis to do so.

Please note that the right to restrict processing is not an absolute right and we may decline your request where we have a lawful basis to do so. In the event that this occurs, we will explain our legal basis for doing so.

Right to object

CORU is required by law to undertake certain tasks in the public interest. If processing personal data is needed to perform these tasks it is likely that CORU will be unable to agree to stop processing the personal data. CORU may also refuse to stop processing personal data if we can demonstrate that our reasons for processing personal data are more compelling than your reasons for wanting CORU to stop.

Right to data portability

This right only applies when data processing is carried out by automated means. As CORU does not process personal data in this way, this right does not apply to the data CORU holds.

Rights in relation to automated decision making and profiling

CORU does not use personal data to carry out any personal profiling or automated decision-making.

Our response

If you choose to exercise any of your rights as a Data Subject, CORU will respond to that request within one calendar month. If your request is particularly complex or large, CORU may extend this timeframe by a further two months. CORU will inform you if we need to extend our response time.

If CORU cannot comply with your request, we will let you know why.

The Data Protection Commission

You have a right as a Data Subject to lodge a complaint with the [Data Protection Commissioner](#) if you think that CORU has not processed your data in accordance with data protection legislation.