



The Faculty of Occupational Medicine Scheme for Continuing Professional Development in Occupational Medicine

Definition of “Continuing Professional Development”

A continuing process, outside formal undergraduate and postgraduate training, that enables individual doctors to maintain and improve standards of medical practice through the development of knowledge, skills, attitudes and behaviour. CPD should also support specific changes in practice.

Statement of Principle

The Faculty of Occupational Medicine supports the Ten Principles for College/Faculty CPD schemes as revised in October 2007 **[1 and Appendix 1]**.

Description of the Faculty

The Faculty of Occupational Medicine was formed in 1978 to provide a professional and academic body empowered to develop and maintain high standards of training, competence and professional integrity in occupational medicine. Its objectives are to:

- act as an authoritative body for consultation in matters of education and public interest concerning occupational medicine
- promote for the public benefit the advancement of education and knowledge in the field of occupational medicine
- develop and maintain for the public benefit the good practice of occupational medicine, providing for the protection of people at work by ensuring the highest professional standards of competence and ethical integrity

INTRODUCTION

The rationale behind participation in CPD and the relevance of CPD to revalidation

Revalidation is the process that will ensure that licensed doctors remain up to date and fit to practise. The two key elements of Revalidation are:

- To confirm that licensed doctors practise in accordance with the GMC’s generic standards (relicensure);
- To confirm that doctors on the specialist register and GP register meet the standards appropriate for their specialty (recertification).

The contribution of CPD to Revalidation is set out in the Chief Medical Officer’s Report, ‘Medical Revalidation – Principles and Next Steps’ **[2]**. The Report states that:

- “Continuing professional development (CPD) is the process by which individual doctors keep themselves up to date and maintain the highest standard of professional practice.
The GMC will require documented proof of CPD as an essential component of the information needed for successful appraisal and revalidation
- CPD belongs to the individual, but there is a need for the organised collection of evidence of appropriate activity, together with some audit of the adequacy of any individual’s programme. To facilitate these requirements, the Colleges and Faculties of the Academy of Medical Royal Colleges have developed CPD Schemes
- It will be desirable to increase the linkage between CPD and appraisal. Appraisal focuses on meeting agreed educational objectives
- Monitored systems¹ that define College or Faculty approved educational activities may assist the meeting of those objectives
- Effective CPD schemes are flexible and largely based on self-evaluation. This lets doctors develop what they do in the context of their individual professional practice while providing evidence for external scrutiny
- The principles underpinning CPD schemes need to be as simple as possible while providing a good foundation on which to build an appropriate portfolio unique to the individual doctor.”

The Ten Principles support this approach, and in particular, Principles 1, 2 and 10 set out the relationship between CPD, Appraisal and Revalidation.

THE PRINCIPLES OF THE CPD PROGRAMME

Normally, credits given for CPD should be based on one credit² equating to one hour of educational activity (or an equivalent measure of educational activity). The minimum required should be an average of 50 credits per year. Credits for un-timed activities such as writing, reading and e-learning should be justified by the participant or should be agreed between the provider(s) and the Faculty’s Director of Professional Development. **(Principle 4).**

If reliable methods can be developed and validated that relate credits to the learning achieved during an activity, then this would also be acceptable.

Those who are required to participate in the CPD Programme

All doctors who have a licence to practise will be required to provide documentation that they are participating in CPD in order to keep up to date and fit to practise. Documentation of participation in, and learning from, CPD to the standards set by the Faculty will be a requirement for specialist recertification.

¹ ‘Monitored systems’ is taken to mean arrangements in place to quality assure Colleges’ and Faculties’ CPD programmes.

² A CPD Credit represents learning that is equivalent to one hour of educational time spent in good quality educational activity. The actual learning will vary between individuals. Other methods of estimating the educational value of CPD activities are being developed and piloted.

Individual personal responsibility for CPD

Individuals have the responsibility to record CPD that has educational value. Where an activity has not been formally approved for CPD, it is the responsibility of the individual to record the activity and document the learning achieved. Learning may reinforce existing good practice as well as provide new knowledge.

Self-accreditation of relevant activities and documented reflective learning should be allowed and encouraged (adapted from **Principle 5a**). It will be the responsibility of individuals to ensure that they undertake a range of CPD that reflects the local and national needs of their practice and their own learning needs.

How CPD Credits are registered

Self-accreditation of educational activities will require evidence. This may be produced as a documented reflection. Evidence of attendance at live events or of participation in all other CPD activities should be provided, as determined by each individual College or Faculty (adapted from **Principle 6**).

Participants are asked to record their CPD activities using the Faculty's on-line CPD diary, which contains space for reflection and feedback to the CPD provider. Evidence of attendance in the form of programmes and attendance certificates should be collected separately and retained in hard copy for audit and revalidation purposes until the end of the current revalidation cycle. The diary is accessed via a link on the Faculty's web site.

THE PROGRAMME

CPD should include activities both within and outside the employing institution, where there is one. In order to support doctors in obtaining a proportion of their CPD outside their workplace, a minimum threshold of 25 'external' CPD credits is required. There should also be a balance of learning methods that includes a component of active learning (**Principle 2**). CPD activities should include professional development outside narrower specialty interests (adapted from **Principle 1**).

Definitions of Categories of CPD

Categories assist people to classify CPD and to ensure that a balance of activities is undertaken.

The Faculty classifies CPD according to the following matrix:

	Internal	External	Personal
Clinical			
Non-clinical			

1. External CPD – Events typically hosted outside the doctor's organisation and with a broad audience of doctors and professionals – e.g. study courses, conferences, workshops and symposia. In occupational medicine such events have been sponsored by organisations as diverse as the Faculty itself: the Society of Occupational Medicine, ALAMA, ANHOPS, various academic centres and commercial providers. External CPD usually requires specific funding and absence from normal work activity. A limited number of external credits may also be claimed for Distance Learning and on-line

credits and for participation in Faculty examinations, the remainder counting as Personal credits.

2. Internal CPD – Events such as departmental meetings and journal clubs and activities such as audit, project work and research, the development of health policies within an organisation, personal development in management or IT skills.
3. Personal CPD – Activities where the individual doctor reflects and determines the educational benefits gained, including private reading, and researching the evidence base for dealing with a particular condition.

The number of credits that can be claimed in each of the sections has been limited to ensure that doctors achieve a balanced portfolio of CPD activities.

The separation into clinical and non-clinical categories is provided as a guide to doctors and their assessors in determining the appropriate balance of CPD in relation to their training requirement. There are no restrictions on the proportion of clinical and non-clinical CPD. Some CPD activities will contain a mixture of both types of activity and it will be for the individual to decide which category it should go into when entering a self-certified activity.

Credit Requirements

1. In keeping with other Royal Colleges and Faculties we recommend a target of 50 credits per year, averaged over a five-year cycle. (In practice, we anticipate that many practitioners will exceed this target).
2. A balance should be sought between external, internal and personal CPD. We recommend that a minimum of 25 credits per year (on average) should be external CPD and a minimum of 15 credits per year internal CPD. Up to 10 personal credits may be counted towards the annual total, though you may record as many personal credits as you have completed.
3. A balance of topics should be covered within each category of CPD rather than focussing on just one or two specific areas.

Educational activities that qualify for CPD

1. External CPD: Events approved by the Faculty

The Faculty will approve external CPD events which meet suitable standards of quality and relevance. The content of the programme will be assessed to confirm this and to determine the allowable time credit.

2. External CPD: Events approved by other Royal Colleges and Faculties

The Faculty has a reciprocal agreement concerning CPD approval with other Colleges and Faculties. The programmes and time credits will be accepted within the Faculty's scheme. Attendance at such events can thus be established by maintaining similar paperwork. However, individuals and their appraisers will need to take a judgement on the relevance of CPD undertaken out with the specialty of occupational medicine and on the balance within an individual's CPD programme.

3. External CPD: Other events

Not all events of relevance can be approved in advance by the Faculty or its sister Colleges. The needs of Members vary considerably and may be met by meetings for which it would be unreasonable to expect prior approval (e.g. overseas meetings and multi-disciplinary or specialist meetings attended by few occupational physicians). On-line and distance learning credits can be claimed in this category, up to a maximum of 7 per annum. Participation in Faculty examinations, including marking, setting questions and dissertation assessment may also be included as external CPD, up to a maximum of 5 credits per annum. The remainder should be recorded as internal.

Flexibility is desirable. But in this case the onus will fall on the appraiser to agree in discussion an accreditable CPD value. Again, the individual should obtain and file in his or her folder a copy of the relevant programme and a certificate of attendance to assist appraisal.

Table 1 lists some common external categories of CPD in occupational medicine for which formal approval arrangements vary.

Table 1: Some common sources of external CPD in occupational medicine

Meetings organised or supported by the Faculty Of Occupational Medicine
Other meetings approved for CPD by the RCP or another College or Faculty
Specialty Society Meetings (e.g. the National Meetings of the Society of Occupational Medicine; local SOM Group Meetings; meetings of ALAMA, ANHOPS and industrial group meetings involving external speakers
Other courses and meetings (UCL, CHIME, IRS, IOH etc) including those providing management or personal development
International/overseas meetings
Local postgraduate meetings
Clinical skills/knowledge improvement 'updates'
Educational visits to other companies, industries and academic institutions
On-line CPD (maximum 7 credits)
Participating in Faculty examinations (maximum 5 credits)

4. Internal CPD

By the same token, the Faculty cannot approve in advance the time values of internal CPD activities – especially as the range of activities is likely to be broad and personalised to the individual learning needs and practice of individuals. Even in retrospect, the task of reviewing internal CPD may be more effectively performed by an appraiser who has specific knowledge of the individual's practice. Moreover, the onus will fall on the appraiser to agree in discussion an accreditable CPD value and on both the individual and his appraiser to ensure that the evidence is fully documented in the CPD folder.

However, because internal CPD is more difficult to evaluate, the Faculty has decided, in line with some other Colleges and Faculties, to recognise certain personal CPD activities (e.g. teaching and lecturing, examining, preparing posters for meetings, supervising postgraduates, and publishing in books and peer-reviewed journals) more formally. These will attract a specified number of points (a minimum per item and a maximum per year), as set out in Table 2a. This will provide a more explicit framework for deciding the number of credits that should be claimed for these activities. By specifying upper limits, it will help to preserve a balance in individual learning plans. And it will extend the range of formally accreditable activities.

Members will still be able to accumulate points for CPD as they have done previously (e.g. for participation in journal clubs, and activities such as audit, project work, the development of health policies and personal skills etc.), and some pointers on how compliance might be demonstrated in these areas, and on how the number of CPD credits might be determined, are provided in Table 2b.

Table 2: Examples of how to count and verify internal CPD

2a. Activities for which a credit value is specified

This activity...under these circumstances...earns these credits		...but no more than these credits/CPD year	Suggested proofs
		item	credits/item		
Teaching and small group tutorials	to medical postgraduates (doctors and nurses); including AFOM and specialty registrar training, and supervising theses	1hr	1	5	A paper record of what you taught, when, for how long, and to whom
Presentations and lectures*	to medical postgraduates in public meetings (eg annual scientific meeting, local SOM/ALAMA/ ANHOPS meetings, international meetings etc)	Lecture	5	10	A paper copy of the programme which identifies your contribution.
Posters*	at scientific meetings	named author on poster	5	10	A copy of the letter of acceptance for the poster.
Examining**	setting medical postgraduate exams (eg diploma, MFOM Pt 2)	setting meeting	5	No more than 10 in a year (the first 5 of which should be recorded as External)	A certificate of attendance will be issued for Faculty examination activities.
	marking medical postgraduate exams (including diploma vivas, MFOM Pt 2 written papers, MFOM thesis, and PhD/DM thesis) being trained as an examiner	exam diet or thesis training day	5		
Publications	if peer-reviewed and accepted for publication; also, chapters and whole books in medical textbooks, and editing textbooks of occupational medicine	named author or editor	5	No more than 10 in a year	Reprint of the paper or letter of acceptance (and for books, a copy of the advertising material).

Service protocol	if a substantial contribution to the writing or revision of the protocol, and if evidencebased or involving a literature search	named author or editor	5	10	A copy of the protocol and note of your personal contribution.
Committee meetings	if involved in elaborating evidence-based reports, protocols and standards documents relevant to occupational medical practice	meeting	5	10	minutes of meeting confirming attendance; drafts or final report to confirm content.
Reviewing	refereeing of journals and grant applications	a paper or grant	5	5	A letter of invitation to review

* A given presentation or poster should only be counted once, even if delivered at several meetings

** The first 5 hours of exam related activity for Faculty examinations may be counted as external CPD

Table 2b. Advice on how to count and verify other activities

This activity can be assessed in this way ...
Journal club	By the time of attendance (1 credit/hour). Ideally each session would include an article or topic reviewed by you personally. Keep a copy of the agenda in your folder.
Internal audit or policy documentation or external research	By estimating the time element of your personal contribution (1 credit/hour). Keep a copy of the completed work in your folder. Remember to count only your time in shared projects.
Internal inter-disciplinary meetings	By the time of educational content. For example, if half the meeting covered routine administration and half was of educational value, count only the latter (1 credit/hour). Keep a copy of the agenda in your folder. Explain what was educational and make a note of what you learned.
Management or IT training	By the time of tuition (1 credit/hour). Try to get a certificate of attendance and achievement. Keep the programme notes and other paperwork in your folder.

5. Personal CPD

Personal CPD arises from activities that are not formally programmed and where the individual has to decide the number of credits to claim based on the perceived educational value. The appraiser will have a key role in agreeing this section. Examples will include personal reading, teaching, research and writing journal articles fall into this category.

Specific exclusions from consideration for CPD credits

The Faculty has not specified any particular exclusion. It is for the individual and their appraiser to decide whether a particular activity will 'maintain and improve standards of medical practice'.

PLANNING AND REVIEW of INDIVIDUAL CPD ACTIVITY

CPD, Annual Appraisal and the Personal Development Plan (PDP)

Participation in College/Faculty based CPD schemes should normally be confirmed by a regular statement issued to participants, which should be based on annually submitted returns, and should be signed off at appraisal (**Principle 7**).

Participants will need to collect evidence to record their CPD activity, normally using a structured portfolio. This portfolio will be reviewed as part of the process of appraisal and revalidation (adapted from **Principle 2**).

Annual appraisal will lead to a personal development plan which will include future CPD activity. The CPD undertaken should reflect and be relevant to a doctor's current and future profile of professional practice and performance (adapted from **Principle 1**).

A report showing all CPD activity submitted for the year together with any reflection noted is available in the on-line CPD diary to facilitate discussion at appraisal, together with a summary by category. Together with your appraiser you will use this information to help inform your Personal Development Plan which will in turn guide your CPD choices in the following year.

The documentation needed of participation in CPD activity

The evidence required to support each CPD activity should include where appropriate a certificate of attendance, course/symposium programme or certificate of completion of e-learning.

Supporting information needed to demonstrate that learning has taken place

Many CPD participants will wish to provide evidence of reflection, change in practice or identify further learning needs to demonstrate that they have done more than passively attend a CPD activity. Notes on reflection can be entered directly into the on-line CPD diary.

APPROVAL AND QUALITY CONTROL OF CPD ACTIVITIES

Responsibilities of the providers of CPD activities

Where a formal approval or accreditation process exists for CPD activities there should be clear guidance to providers about the criteria against which activities will be evaluated.

Guidance for providers of CPD activities and the relevant application form can be found at: http://www.facocmed.ac.uk/cpd/crs_app.jsp

Procedures for recognition/approval of CPD activities

Formal approval/accreditation of the quality of educational activities for CPD by Faculty should be achieved with minimum bureaucracy and with complete reciprocity between Colleges and Faculties for all approved activities. The approval/accreditation process and criteria should be such as to ensure the quality and likely effectiveness of the activity (**Principle 5b**).

To obtain CPD approval for an activity (conference / training meeting etc) organisers should complete a Course Approval form (obtained from the Faculty's website). The completed form, together with a full programme and the appropriate payment should then be sent to the Faculty.

Use of feedback and reflection

Feedback on the quality of CPD activities should be given to the activity provider and acted upon. Where the activity has been formally approved the feedback should be available to the approving body and used in quality control of the approval process.

Organisers are expected to issue feedback forms to delegates attending their events. These are to help the organisers improve their event and to ensure that delegates benefit from attendance. No additional feedback is provided by the Faculty.

Self-accreditation of relevant activities should be allowed, and documented reflective learning should be encouraged. Self-accreditation will require evidence, which may be produced as a documented reflection (adapted from **Principles 5a and 6**).

Who carries out the approval of CPD activities

The Faculty's Director of Professional Development is responsible for approving CPD activities and confirming the number of credits to be awarded.

Training and monitoring of approvers

New approvers are trained through a process of apprenticeship. There is no formal monitoring process.

How the performance of the whole system is monitored, including IT aspects

The CPD system is monitored through examination of summary statistics of participation provided by the on-line CPD diary's administration function and audit results. The results are reported to the Faculty Board annually.

Audit of Compliance

In order to quality assure their CPD system and to verify that claimed activities have been undertaken and are appropriate, Colleges/Faculties should audit participants' activities on a random basis (adapted from **Principle 8**).

Until alternative quality assurance processes are established, the proportion of participants involved in random audit each year should be of a size to give confidence that it is representative and effective. This proportion will vary according to the number of participants in a given scheme (**Principle 9**).

Participation in College/Faculty based CPD schemes should normally be confirmed by a regular statement issued to participants which should be based on annually submitted returns, and should be signed off at appraisal (**Principle 7**).

The Faculty has an obligation to monitor participants' CPD activities. Audit helps members to confirm their compliance with a documented scheme of CPD and assist their appraisers by providing an external review of the appraisal process in CPD.

You should print off an annual certificate of CPD attained at the end of the CPD year for use in your appraisal. A rolling programme of audit will occur in which a Faculty representative will review the supporting documentation for the previous year of around 20% of participants annually. Under normal circumstances this external review should not occur more than once every five years.

The Faculty does not require documentation to be retained once this review has taken place, though it would be advisable to keep the paperwork until the end of the current revalidation cycle.

Your CPD returns must be supported by good documentation. The Faculty will not otherwise be able to verify the points you claim when we audit your folder and your appraisers may run into similar difficulties.

Consequences of failing to provide evidence or providing insufficient evidence

Failure to produce sufficient evidence to support claimed credits will result in an individual's annual statement being annotated accordingly for the year involved and the individual subsequently being subject to audit annually for a defined period. Further failure or suspected falsification of evidence for claimed CPD activities may call into question the individual's fitness for revalidation, and may result in referral to the GMC/GDC (adapted from **Principle 10**).

Any queries raised by the auditor will be referred to the Director of Professional Development for consideration of further action.

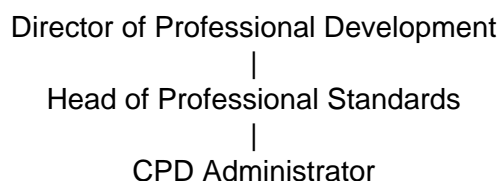
How auditors are trained

Auditors are trained through a period of apprenticeship.

ADMINISTRATION

Administering CPD

The Faculty personnel responsible for CPD are:



The Director of Professional Development (DPD) chairs the Professional Development sub-Committee which reports to the Faculty Executive Committee of which the DPD is also a member. Matters of policy are referred to the Faculty Board for approval.

Registration of Participants

College/Faculty CPD schemes should be available to all Members and Fellows and, at reasonable cost, to non-Members and Fellows who practise in a relevant specialty (**Principle 3**).

Participating in CPD is a benefit of membership of the Faculty of Occupational Medicine. Subscribing members join the scheme by applying for a password for the on-line diary. Non-members may apply to join the scheme on payment of an annual fee. Details are available on the Faculty web site.

Responsibilities of Employers

In its Guidance on Continuing Professional Development **[3]** the GMC states:

- Employers and organisations that doctors work in should recognise the benefits of allowing enough resources for doctors to carry out CPD activities.
- Resources, such as time to think and access to on-site educational facilities, should be available to all doctors to allow them to develop professionally.

The responsibility for fulfilling CPD requirements and achieving learning needs rests with the individual doctor. However, the employing organisation (including locum agencies, where applicable) should provide support for professional development in partnership with other relevant bodies.

SPECIAL CIRCUMSTANCES

All doctors who hold a licence to practise should remain up to date with the CPD requirements set out by their Medical Royal College or Faculty. Doctors working less than full time have an equal obligation to provide high quality patient care as do those working full time, and thus should maintain the same commitment to their CPD. Colleges and Faculties, as well as employers, should be as flexible as possible in enabling this commitment to be met for all doctors.

In addition, the local arrangements to facilitate CPD should reflect current NHS guidance on equality and diversity in the workplace **[4]**.

In some circumstances participation in CPD may be difficult or impossible for periods of time. The following are some of the circumstances to be considered, and some of the ways in which these may be addressed:

A rolling five-year programme

A shortfall in CPD activity at the end of a fixed five-year cycle is difficult to make up. However, the use of a rolling cycle allows the average amount of activity to be maintained over five years if a shortfall occurs

Doctors undergoing remediation

CPD will be an essential part of the remediation process.

Doctors who are suspended

This is likely to be rare, and the period of suspension before return to work, or a decision on re-training or remediation should be short. Where necessary it should be possible to make up any lost CPD credits over a five-year cycle.

Sick-leave, Maternity Leave or other Career Breaks

Any deficit in CPD activity should be made up over the remainder of the five-year cycle. This may be achieved either prospectively (where possible) retrospectively after return to clinical work, or a combination. Where the absence is for more than a year, advice from the Faculty should be sought.

Doctors who have fully retired from clinical practice

If a retired doctor wishes to retain a license to practise, then the CPD requirements of the College or Faculty should be met. As much flexibility as possible should be provided, and a doctor experiencing difficulty should contact the relevant College or Faculty.

Non-consultant career grade doctors

This group of doctors should meet the same CPD requirements as other career grade doctors in their specialty.

Doctors working in isolated environments outside the UK

In some circumstances the type of CPD activity available may not conform to the quality standards set by the College or Faculty. The doctor should self-accredit as much CPD as appears justifiable in terms of the learning achieved. Any shortfall should be made up on return to the UK. Periods of absence of more than one year may require specific CPD as agreed with the doctor's appraiser, or Faculty.

REFERENCES

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www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_086430
3. Guidance on Continuing Professional Development. GMC, London, 2004. At:
http://www.gmc-uk.org/education/continuing_professional_development/cpd_guidance.asp
4. Navigating Equality and Diversity. NHS Employers
<http://www.nhsemployers.org/EmploymentPolicyAndPractice/EqualityAndDiversity/Pages/Home.aspx>

Appendix 1: Academy of Medical Royal Colleges 10 Principles of CPD

A Review of the Ten Principles for CPD in the Context of the Proposals of the Donaldson Report

THE TEN PRINCIPLES FOR COLLEGE/FACULTY CPD SCHEMES

1. An individual's CPD activities should be planned in advance through a personal development plan, and should reflect and be relevant to his or her current and future profile of professional practice and performance. These activities should include continuing professional development outside narrower specialty interests.
2. CPD should include activities both within and outside the employing institution, where there is one, and a balance of learning methods which include a component of active learning. Participants will need to collect evidence to record this process, normally using a structured portfolio cataloguing the different activities. This portfolio will be reviewed as part of appraisal and revalidation.
3. College/Faculty CPD schemes should be available to all members and fellows and, at reasonable cost, to non-members and fellows who practise in a relevant specialty.
4. Normally, credits given by Colleges/Faculties for CPD should be based on one credit equating to one hour of educational activity. The minimum required should be an average of 50 per year. Credits for un-timed activities such as writing, reading and e-learning should be justified by the participant or should be agreed between the provider(s) and College/Faculty directors of CPD.
5.
 - a) Self-accreditation of relevant activities and documented reflective learning should be allowed and encouraged.
 - b) Formal approval/accreditation of the quality of educational activities for CPD by Colleges/Faculties should be achieved with minimum bureaucracy and with complete reciprocity between Colleges/Faculties for all approved activities. The approval/accreditation process and criteria should be such as to ensure the quality and likely effectiveness of the activity.
6. Self-accreditation of educational activities will require evidence. This may be produced as a documented reflection. Formal CPD certificates of attendance at meetings will not be a requirement, but evidence of attendance should be provided, as determined by each individual College or Faculty.

7. Participation in College/Faculty based CPD schemes should normally be confirmed by a regular statement issued to participants which should be based on annually submitted returns, and should be signed off at appraisal.
8. In order to quality assure their CPD system, Colleges/Faculties should fully audit participants' activities on a random basis. Such peer-based audit should verify that claimed activities have been undertaken and are appropriate. Participants will need to collect evidence to enable this process.
9. Until alternative quality assurance processes are established, the proportion of participants involved in random audit each year should be of a size to give confidence that it is representative and effective. This proportion will vary according to the number of participants in a given scheme.
10. Failure to produce sufficient evidence to support claimed credits will result in an individual's annual statement being endorsed accordingly for the year involved and the individual subsequently being subject to audit annually for a defined period. Suspected falsification of evidence for claimed CPD activities will call into question the individual's fitness for revalidation, and may result in referral to the GMC/GDC.

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