



## **CORU Consultation on Continuing Professional Development (CPD)**

### **Joint Response from FODO Ireland and IADO**

The Federation of (Ophthalmic and Dispensing) Opticians (FODO) Ireland represents opticians and optical practices in the Republic of Ireland. Our mission is to achieve eye health for all, delivered through world-class services, provided by regulated community-based optometrists and dispensing opticians operating in a competitive environment. FODO's members include both independent and corporate opticians which operate as primary eye care contractors. Between them, FODO Ireland members deliver 55 per cent of the eye care by volume and some 360,000 eye examinations a year in the Republic.

Further information about FODO, including our beliefs and ethos is available on our website <http://www.fodo.com/ireland>.

The Irish Association of Dispensing Opticians (IADO) represents registered dispensing opticians and contact lens opticians in Ireland. Dispensing Opticians supply, fit and sell glasses and contact lenses and low vision aids to a prescription provided by an optometrist (ophthalmic optician) or eye surgeon. IADO Members work across the full range of community eye care practices including small to medium sized independent optical practices to multiple owned and franchise high street opticians.

For further information about IADO please visit our website <http://www.iado.ie/>

### **Introduction**

FODO Ireland and IADO welcome the opportunity to respond to this consultation and are happy to work with CORU on the implementation of CPD for optical registrants. As CORU will recognise, optometrists and dispensing opticians will soon be registered with CORU and we would wish for the systems being designed at present to be appropriate for these optical professions.

We agree with CORU that CPD helps to promote professionalism and we would always seek to support registrants striving to develop skills and knowledge throughout their professional lives.

In our view, the framework proposed by CORU demonstrates a sensible, pragmatic and proportionate approach to CPD and rightly places the onus on the registrant to ensure they keep their skills up to date. Overall we believe that the proposed CPD framework is generally well balanced and positive in its aims and structure.

Our main concern would be the interpretation of what is considered to be CPD for optometrists and opticians. Whilst the appeal of a uniform scheme across all health

professions is understandable, the intended CPD framework may disadvantage lower risk professions as CPD can mean different things to different professions.

The evidence is that community optical care is comparatively low risk, we already promote continuous education for registrants and there are a range of CPD sources already available to them. In our view it is important for this effective range of options to continue to be available to optometrists and dispensing opticians and we would be keen to work with CORU on accompanying guidance for optical registrants so that CPD is appropriate to the scopes of practice and levels of evidenced risk in our sector.

We are pleased to see that CORU has committed to working with the professional representative bodies to get this right and FODO Ireland and IADO look forward to being fully involved in that process. We were also pleased to see that there will be two years for registrants to adapt to the new system once the optical professions register transfers to CORU.

In summary, FODO Ireland and IADO support the CPD framework and would be keen to support the Registration Board to implement effective CPD for optics. We look forward to working with you and the Department of Health to ensure that registrants can continue to develop their skills and potential so that patients continue to receive an expanding range of high quality and affordable eye care in Ireland.

**Reponses to Questions:**

1. Personal Information (you do not need to provide your personal information if you would prefer not to)

**FODO Ireland, 38/39 Fitzwilliam Square, Dublin 2**

**Telephone: 086 228 2832**

**Email: [giles@fodo.com](mailto:giles@fodo.com)**

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**Submitted by: Harjit Sandhu ([harjit@fodo.com](mailto:harjit@fodo.com)) on behalf of FODO Ireland and IADO**

2. Would you like to be added to our database so we can contact you regarding future developments?

- YES
- NO

3. Are you contributing to this survey in (please tick one)

- Are you contributing to this survey in (please tick one) a personal capacity?  
 **on behalf of an organisation?**

If on behalf of an organisation, please specify:

**FODO Ireland which represents opticians and optical practices – see description above**

**IADO which represents dispensing opticians and contact lens opticians – see description above**

4. How did you hear about this consultation? (please tick as many as apply)

- On [www.coru.ie](http://www.coru.ie)  
 On another website  
 **By email**

5. The following definition of CPD is proposed in the framework document:

“Continuing professional development is the means by which health and social care professionals maintain and improve their knowledge, skills and competence and develop the professional qualities required throughout their professional life. CPD is an important component in the continued provision of safe and effective services for the benefit of service users.”

Do you think this definition provides a clear statement of the purpose and desired outcomes of continuing professional development?

- YES**  
 NO

6. All registrants are required to undertake CPD as a condition of their registration. The standard for CPD is set out in the framework for the Code of Professional Conduct and Ethics, in the section Standards of Performance. “The registrant must make sure that his/her knowledge, skills and performance are of a high quality, up to date and relevant to their practice. Registrants are required to maintain and develop professional competence by participation in continuing professional development”.

The CPD requirements (page 12 of framework document) set out what the registrant has to do to demonstrate how s/he meets the standard for CPD.

Do you think that the requirements are clear?

- YES**  
 NO

7. What are your views on the proposed requirements for CPD? Please answer in the space provided

We feel that the CPD system proposed is well-designed and look forward to working with CORU on implementation. However, we would like highlight two specific concerns that we have as a sector:

I) Points threshold:

We understand the initial attraction of proposing that all health professionals should undergo the same amount of CPD. We appreciate that CORU have researched international systems and developed this framework based on that research. However, it seems illogical to us not to take a more proportionate approach to the type of CPD required for each profession relating to scope of practice and relative risk. Otherwise, say, chiropodists would appear to have the same CPD requirement as, say, clinicians in the rapidly advancing areas of cancer therapy or paediatric cardiac surgery. Ideally the education requirements should remain proportionate to the specific profession being regulated. Extensive research shows optics to be a low risk profession. In other regulatory environments - where optometrists have the same function as those in Ireland - continued education has been set at 12 hours per annum (for example in the UK).

We are somewhat reassured that CORU will consider a wide range of activities as appropriate for CPD and, if the 30 hours proposal is to go ahead, would wish to work with CORU on accompanying guidance to clarify what counts as CPD for optical professions in a way that is affordable and practical for the optical sector

II) Cost on the Front Line:

We feel that the cost of maintaining portfolios has not been addressed. As CORU and the Department of Health will recognise, this is a significant departure from the previous system and will require a lot of additional time and effort to complete. We are especially worried about the burden on smaller optical businesses. The time to complete 30 CPD hours per year equates to four to five working days per year, we query whether dedicating this much clinical time to CPD in our sector would be justified by the scale of the benefits.

We would also point out that, as a sector, we receive a very low fee for providing state-funded sight tests comparative to other professions where the cost per CPD hour will be significantly lower. We appreciate that this is not something for CORU to resolve and will raise this in parallel with the Department of Health. We would be grateful if CORU could recognise the difficulties this creates for the optical sector and that it will work with the representative bodies i.e. ourselves and the AOI to ensure cost-effective and proportionate implementation of the CPD requirements.

8. Is the explanation of the stages of the CPD process clear and easy to understand (pages 14 to 17 of document)?

YES

NO

9. The proposed process for registrants when undertaking their CPD is set out in the five stages:

1. Review
2. Plan
3. Implement
4. Reflect
5. Demonstrate

Please provide any comments or observations on the 5 stage CPD process, in the space below.

**This framework is logical and easy to follow. It is also encouraging to see eight points rewarded for completing the CPD portfolio. As noted above we have concerns about the professional time and effort required to comply with the CPD requirements which we will also raise with the Department of Health.**

**It would be helpful for CORU to alert registrants periodically with a reminder to update their CPD portfolio during the year, and to back it up electronically.**

10. The CPD portfolio is the means by which the registrant maintains a record of their CPD throughout each 24 month cycle. The portfolio has five elements:

1. Professional Practice and Practice Setting
2. Personal Learning Plan
3. Record of CPD Activities
4. Reflections on CPD Activities
5. Evidence of CPD Activities.

**Is the explanation of the elements of the portfolio, provided in the framework document, clear and easy to understand? (pages 18 & 19)**

YES

NO

11. Do you think the CPD portfolio, as proposed, is an appropriate way for registrants to maintain their CPD records on an ongoing basis and document their compliance with the CPD requirements?

YES

NO

Please give details in the space provided.

We believe that the proposed CPD framework is progressive and designed to be flexible. As noted above, we would like to have a range of optical CPD accredited (clarified through further optics specific guidance) and financial support that covers the time and effort of complying with the CPD requirements.

12. To monitor compliance with the scheme a random selection of registrants from each profession will be required to submit their portfolio for audit at the end of each 24-month cycle.

Are the stages of the proposed audit process clearly presented and easily understood (pages 21-24)?

YES

NO

13. The criteria that will be used by the assessors when they are assessing CPD portfolios are set out on pages 25 & 26 of the framework document.

Do you think the assessment criteria will act as a useful prompt for registrants on how to ensure their CPD portfolio meets the CPD requirements?

YES

NO

Please elaborate on your answer in the space provided.

Ideally, CPD should promote professionalism and empower registrants to take control of their own professional development, which we believe this system does.

We have some concerns that a blanket audit system will be put in place across the various professions registered with CORU. As stated above, optics is low risk and the type of CPD that is appropriate for a dispensing optician will be different from a radiographer, for example. We would like this clarified through joint guidance which specifies appropriate and proportionate CPD for optical professionals.

We would also like to see a clear recommendation that registrants maintain both an electronic and additional back up copy of their CPD (e.g. on another PC or hard copy).

14. Appendix 1 (pages 28-30) presents a list of CPD activities and gives examples of appropriate supporting documentation for each activity. This list, whilst not exhaustive, is intended to guide and assist registrants when planning and undertaking CPD.

Are there other learning activities that should be added to the list?

YES

NO

Please elaborate on your answer in the space below.

We would like to see CPD directly related to reflection on interaction with patients, record keeping, and discussions on professional development with the registrant's employer. Reflection on patient interaction and record keeping enhances the quality of patient care and promotes core values in daily practice. Similarly, an employer is well placed to give guidance on areas in which a practitioner might wish to develop their skills.

15. Have you any comments on the supporting documentation examples (Appendix 1) listed for each of the CPD activities? (Please be specific in your answer)

No

16. Appendix 2 (pages 31-37) presents templates for each of the five elements of the CPD portfolio. These templates are designed to aid and guide the registrant in the process of building and maintaining their CPD portfolio. A registrant can choose to use these templates or if there is an alternative template available from their professional body, employer or other representative body this may also suffice. Templates are provided for:

1. Professional Practice and Practice Setting
2. Personal Learning Plan
3. Record of CPD Activities
4. Reflections on CPD Activities
5. Evidence of CPD Activities.

Do you think the templates provide a useful resource for registrants undertaking CPD?

- YES
- NO

Please elaborate on your answer in the space below, highlighting changes you would recommend.

As explained we would welcome a recommendation that registrants maintain an electronic copy of their CPD portfolio, with suitable back up in place (which might include saving to another location or printing a copy at three monthly intervals).

17. The framework facilitates the registrant maintaining their CPD records in hard copy or electronically, and to use the templates provided or alternatives provided by professional bodies, employers or other relevant bodies. Have you any comment on this flexibility regarding CPD records?

In this respect, flexibility is key. Several optical professionals are also registered in other countries (most commonly the UK) and would wish their CPD from other countries to

count towards their portfolio for CORU. In particular the CPD schemes for optometrists and dispensing opticians would need to dovetail with the General Optical Council (GOC) CET scheme. We do not foresee any great difficulty given that accredited schemes allow GOC registrants to gain CET points, which should also count towards the CORU scheme. We would however be grateful for clarification about this.

As noted above, we would be happy to provide accompanying guidance on appropriate and proportionate CPD for optical professionals. As a sector, we would wish to work with CORU to ensure this is practical and workable in optical practice.

**18.** It is proposed to develop the following supporting documentation once the CPD policy is confirmed:

- Registrants guide to the standard and regulations
- Assessors guide to the standard and regulations
- Employers guide to CPD
- Sample portfolios for the different professions.

What other supporting documents could CORU provide?

Please use the space provided below.

**We would wish to see this type of supporting documentation co-developed with all of the representative bodies for the optical sector, namely FODO, IADO and the AOI. As above, we would wish to develop further the types of CPD that are appropriate to the optical sector. Through that we would wish to agree with CORU profession-specific examples of what constitutes CPD.**

**19. Did you find this consultation form useful?**

- YES
- NO

This response has been submitted by:

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