

UK INTER PROFESSIONAL GROUP

GUIDE TO THE

REVALIDATION OF PROFESSIONAL COMPETENCE

This outline framework has been prepared for the guidance of Governing Bodies responsible for the regulation of a profession, and who may be contemplating revalidating the professional competence of all or part of their list of registrants. Governing Bodies should adapt the guidance to their individual situation. The guidance relates to the revalidation of the competence of the individual and may not be wholly applicable to the revalidation of corporate or business competence.

Introduction

1. The UKIPG definition of a Profession is

‘ an occupation in which an individual uses an intellectual skill based on an established body of knowledge and practice to provide a specialised service in a defined area, exercising independent judgement in accordance with a code of ethics and in the public interest. ’

2. The UKIPG further defines the purpose of Professional Regulation as

‘ to assure the quality of professional services in the public interest. The regulation of a profession involves the setting of standards of professional qualifications and practice; the keeping of a Register of qualified persons and the award of titles; determining the conduct of registrants, the investigation of complaints and disciplinary sanctions for professional misconduct. ’

3. There is considerable public concern when professional practice falls short of expected standards or is judged not to be in the public interest. There is an increasing public expectation that a professional should be competent to current standards. The public must have confidence in professionals to follow a Code of Conduct, maintain their competence and only undertake professional tasks for which they are competent. There is therefore a need to have evidence of competence and for regulatory bodies to be more pro-active in maintaining professional standards, rather than merely reacting to complaints
4. The Revalidation of Professional Competence is a procedure for the periodic assessment of registrants holding professional qualifications to ensure that they are competent to practise to contemporary standards in the area in which they claim expertise.

Scope

5. There is a wide range of professional registers, from lists of members of professional bodies to statutory lists of those licensed to practice in a reserved area of work. Revalidation of Professional Competence applies to all professionals who, through being on such registers, hold themselves out to the public as having expertise in their areas of work.

6. Many areas of work are reserved by statute to Approved Persons who are generally required periodically to revalidate their competence. The Government has determined that it is in the public interest for the competence of health care professionals to be revalidated.
7. It is also in the public interest for professionals engaged in all unreserved areas involving the health, wealth, safety and the environment of the individual to demonstrate through a transparent system of revalidation that they have voluntarily kept up to date and are competent in their area of expertise. The public are not obliged to use such persons for such work nor is the work they do restricted to them.
8. Many Registers are generic and include professionals providing services in a wide range of specialist areas; revalidation may best apply to each specialist sub-set. Some Registers include non-active and retired professionals: revalidation would apply only to active members who should be clearly indicated on the Register and on revalidation may be shown to hold a current practice certificate or licence to practice.

Procedures

9. Revalidation procedures should be transparent and proportional to the risk of harm that incompetence of the professional might cause to the individual. It is not in the public interest for revalidation to be on a sample basis: all those registrants whose listing is subject to periodic revalidation of competence must be revalidated within the prescribed period. A revalidation system needs to be as administratively simple as possible in order to ensure that costs are not disproportionate.
10. The revalidation of professional competence requires professionals to demonstrate that they can meet current benchmark standards of practice in their area of work. The revalidation should be based on evidence provided by the registrant and assessed by a third party. A CPD record dependant on accumulating hours or points based on course attendance, does not meet the basic requirements of revalidation. A written examination may not be appropriate.
11. The benchmark standards of competence should be set by practising professionals in the Governing Body with lay participation as appropriate. The terms in which the competence standards are set will vary in each profession and each area of work. For many professions work has been done on knowledge and competency standards. The standards should relate to current practice.
12. The evidence to be provided by the registrant might include:-
 - Evidence of recent and relevant experience
 - Evidence that they have kept up to date e.g. a record of relevant CPD in the context of a Personal Development Plan.
 - An appraisal of competence against the benchmark standards.
 - Evidence of good health and good conduct
13. The appraisal of competence may be self assessed, by a professional mentor or colleague or as part of a performance appraisal by an employer.

14. Assessment of the evidence should preferably be by an independent third party peer review. It will probably be a consideration of a paper submission with the option to call for interview or to undertake a practice inspection. There is scope for evidence to be computer based, delivered over the internet. The assessors might be:
 - a. A professionally qualified administrator of the Governing Body or
 - b. A peer registrant appointed by the Governing Body or
 - c. An employer accredited by the Governing Body or
 - d. A peer group of 2 or 3 with lay representation if appropriate.

Assessors should be trained and those with a large work load paid.

Period of Revalidation

15. The period between revalidations varies from 12 months to 5 years. Twelve months might be appropriate for areas of work where professional incompetence could lead to serious personal injury or death. Twelve months is also the normal period for renewal of Registration with the payment of a subscription; some professions also requiring evidence of CPD and PI insurance.
16. Five years seems to be a better practice for revalidation of professional competence, if only because of the resources involved in a 100% sample. It is also compatible with the European Standard for the certification of skill (EN45013).

Cost

17. Although revalidation is in the public interest, the main immediate beneficiary is the registrant who is able to continue to practice in a reserved area of work or in an unreserved area to demonstrate current competence in the market. The cost should therefore be born by the registrant and may be tax deductible. Responsible employers may reimburse the registrant. The cost of not monitoring competence could be much greater and not just to the registrant.

Sanctions

18. Registrants failing a revalidation assessment should be given the opportunity to make good their deficiency, for example through a period of supervised practice or additional CPD. For a registrant on a Statutory Register, the ultimate sanction is to be 'struck off'. For a registrant on a non-statutory register of professionals in membership of a professional body, the sanction might be to lose the annotation in the list of members that the registrant holds a Practice Certificate or is otherwise certified as of current competence. This may not involve the loss of a professional title. Care must be taken not to mislead the public if a non certified member is still able to offer professional services.
19. Registrants whose names are removed from a register or whose practice certificate or licence to practice is not renewed must have the facility of making an Appeal against the decision.

Accreditation

20. A Governing Body might seek to add to the standing of its Practice Certificate and revalidation procedures by having the certification procedures accredited to European Standards by the UK Accreditation Service (UKAS).