Dear Professor Wilson,

The Association of Nutrition is pleased to have been invited to respond to the UKPHR’s consultation on its CPD Scheme for UKPHR practitioner registrants.

Introduction

1.1 Association for Nutrition (AfN) is the voluntary regulator for qualified nutritionists. We protect and benefit the public by promoting nutrition and public health and championing high standards of practice in the nutrition profession. We maintain a competency-based register of individuals who are qualified and competent in nutritional science and practice and agree to uphold professional and ethical standards through a code of conduct. Only individuals who meet these high standards in evidence based science and professional practice can join and remain on the Register.

1.2 Registered Nutritionists occupy important positions, often with strategic input, in policy and service functions throughout the NHS and private healthcare, Public Health, in animal welfare, academia and the food sectors (retailing, service, manufacturing and aspects of agriculture) and across the field of Sports and Exercise Nutrition.

1.3 The Association accredits over 50 Bachelors and Masters courses in nutrition and promotes high standards of competence, skill and ethical conduct. Each year approximately 450 students qualified in the science of nutrition with a strong all round skill set and a firm understanding of and commitment to professional responsibility and accountability graduate from AfN accredited courses.

1.4 In addition, following completion of a project funded by the Department of Health under the Third Sector Investment Programme entitled Improving Capacity, Confidence and Competence in Nutrition across the Workforce, we have launched our Certification Scheme. A major focus of this project explored how to reduce nutrition-related inequalities by improving the capacity, confidence and competence of the frontline nutrition workforce and our Certification Scheme assesses the training available to Levels 3 & 4 of the Public Skills and Careers Framework and Level 5+ on the Qualifications and Credit Framework.

1.5 Our purpose is to protect and benefit the public by defining and advancing standards of evidence-based practice across the field of nutrition and at all levels within the workforce. We welcome the opportunity to provide comment on the proposals contained in your consultation document on the CPD Scheme for UKPHR practitioner registrants.

Our Response

This response takes in the views of both the AfN Executive and AfN Registration Committee, where it was discussed on 19 February 2014.
In summary, AfN found the proposed CPD scheme to be simple to understand and consider it to be equally simple to follow and implement. AfN found the schemes approach to be in line with the PSA’s recommendations of ‘right-touch’ regulation ensuring a scheme does not become a burden on either the individual professional or the regulator yet maintains the requirements for patient safety. As requested, the majority of our comments or questions which we wish to make are attached as a ‘track change’ document. Should you have any difficulty in viewing these comments please do not hesitate to get in touch. Additional discussion centred on the following topics:

**Verifiable CPD**
Consideration should be given to how a broad range of CPD activities can be appropriately verifiable – for example shadowing, working with a mentor or coach, reviewing articles. It should be clear for CPD providers how activities will be recognised as verifiable.

**CPD Providers**
Although UKPHR do not plan to endorse CPD activity, additional guidance is required so registrants know how to select appropriate CPD. Without some form of endorsement a practitioner and an employer will not know whether they are spending on CPD which will be considered acceptable to meet continuing registration requirements. Standards are particularly important for e-learning resources.

**Additional Support/Advice**
Support may be needed in the early stages of the new CPD requirements for registrants who are not currently employed e.g. maternity leave, health reasons, carers leave, or having a career break for any other reason. Consideration could also be given to those who are unable to attend traditional learning forums, such as the disabled or those with long term medical conditions and how funding of attending events will be considered. Those in self-employment for example, may not be able to access the full range of opportunities as those in well financed organisations.

**Reflective Practice**
We support the need for reflective practice (as indicated in 1.5), however this is a new concept and many professionals may not appreciate how reflective should be undertaken and documented (as opposed to a simple description). UKPHR should be encouraged to provide additional guidance around what is required and advice on the different models of reflection and how they can applied. Employers should be encouraged to ensure that reflective practice is embedded into the PDPs.

Should you have any questions in relation to our comments, please do not hesitate to get in touch with me.

Yours Sincerely,

Sarah Manuel  
Registration and Accreditation Manager  
Email: s.manuel@associationformanrition.org  
Tel: 020 7291 8378