

CONTINUING PROFESSIONAL DEVELOPMENT

Document name	Guidelines for Registered Practitioners
Responsible officer	Head of Division: Professional Practice
Approved	September 2017
Revised	November 2021
Version	Тwo

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PREAMBLE

The ethical practice of the health professions requires consistent and ongoing commitment to lifelong learning by all health practitioners, through a process of Continuous Professional Development (CPD). CPD assists health professionals to update and develop the knowledge, skills and ethical attitudes that underpin competent practice. This perspective protects the public interest and promotes the health of all members of the South African society.

Guided by the principle of compassion, health practitioners aspire to standards of excellence in health care provision and delivery. The Health Professions Act, 1974 (Act No. 56 of 1974) (as amended) endorses Continuing Professional Development (CPD) as the means for maintaining and updating professional competence, to ensure that the public interest is always promoted and protected, as well as ensuring the best possible health care service to the community. **CPD should address the emerging health needs and be relevant to the health priorities of the country**.

In the spirit of commitment to best practice, the desire to act and serve, the following Guidelines for Continuing Professional Development, through engagement with continuing education activities, is presented for all health practitioners who are registered with the Health Professions Council of South Africa. The hierarchy of activities detailed include traditional learning experiences such as attendance of conference presentations and workshops, as well as structured courses and quality assurance audits of practices or groups of professionals in their work environments. CPD providers are encouraged to offer learning activities in line with adult education principles and greater learner involvement, with the goal of not only acquiring new or updated knowledge, but also of improving competence and ultimately the performance of the health practitioner with an end benefit to the patient/ client.

The CPD system is based on trust. The HPCSA believes that health practitioners will commit themselves to meeting the requirements for continuing education in the belief that the practitioner and patient/ client will reap the benefits of lifelong learning.

PURPOSE OF THE DOCUMENT

The purpose of the guidelines is to advise health practitioners on the requirements for Continuing Professional Development (CPD) (see section 1.1). The guidelines also assist health practitioners by providing them with guidance on the processes to follow to comply with Continuing Professional Development (CPD). It further assists health practitioners with a varied list of activities to explore to remain compliant.

GLOSSARY

Accreditor - a group or institution that is appointed by a Professional Board once it has met the criteria set out by the HPCSA CPD Committee. The role of the Accreditor is to review and approve applications for the provision of CPD activities (within its profession's ambit) by organizations and individuals without accredited service provider status; to monitor these activities; and to revise continuing education units (CEUs) allocated in the event that the provider fails to comply with the rules and regulations of the CPD guidelines. Professional Boards may delegate their responsibility for accrediting service providers to Accreditors. The criteria and processes to be followed as well as the procedures for record keeping are contained in the **Criteria and Guidelines for Accreditors** document. Accreditors can also provide their own activities if they were approved as an accredited service provider.

Accredited Service Providers - profession specific higher education institutions and departments, professional associations or formally constituted professional interest groups who meet the specified criteria and have been accredited by the board and/ or its designated accreditor to present learning activities for Continuing Professional Development.

Attendance register - the record of attendees at the learning activity reflecting the names, the HPCSA registration numbers of those present and their signatures on completion of the activity. This register must be held by the presenting organisation or institution for three years following the activity; the original register may be audited by the HPCSA as part of compliance checks.

Compliance – Practitioners are required to always be compliant with CPD requirements as stipulated by their professional board. Practitioners should submit the information requested to the CPD section within 21 days on receipt of notification of being selected for an audit.

Health practitioners who are registered in two different professions or categories must meet the requirements of the applicable board. Health practitioners registered in more than one category **within the same professional board** should accrue thirty CEUs per profession with the CEUs inclusive of topics on ethics, human rights and health law applicable.

Practitioners may obtain their units within their own discipline, speciality or sub-speciality or within another relevant discipline, speciality or sub-speciality.

Continuing Education Units (CEUs) - the value attached to a learning activity for Continuing Professional Development.

Updated: Nov 2021

Continuing Professional Development - the continuing education and training referred to in Section 26 of the Health Professions Act, 1974 (Act No. 56 of 1974).

Criteria and Guidelines for Service Providers – the guidelines which provide details on the criteria for and requirements of Service Providers; the nature of the learning activities and the CEUs at each level of the hierarchy; the process to be followed to publicise, present and record the activities.

Deferment - a formal permission sought by a health practitioner and granted by the Professional Practice Committee of Council to suspend and/or postpone the CPD requirements for a period of time. There are conditions for re-entry into practice, which are clearly stipulated for each profession.

Ethics, Human Rights and Health Law is - an understanding of the bioethical principles that determine how health practitioners perform research and interact with patients/ clients and society as described in Chapter 1 and 2 of the Constitution of South Africa, 1996 (As adopted on 8 May 1996 and amended on 11 October 1996 by the Constitutional Assembly). Health care is a constantly advancing field and with these advances, conflicts often arise within the arenas of politics, law, religion, philosophy and economics. An understanding of bioethics helps us to recognize, admit and sometimes resolve these conflicts.

Human rights - the rights of individuals enshrined in the Bill of Rights. All individuals must be treated in a fair and equal manner, taking into consideration their fundamental freedom and human dignity.

Professional Practice Committee of Council - it comprises of representatives from each professional board. Together with the professional boards, the Committee is tasked with developing policy proposals for Continuing Professional Development and monitoring adherence thereof on behalf of the Council.

Health law - the Law governing the relationship between providers and users of healthcare. The Common Law and Statute Law governing the field of health care has to conform to the norms, values and standards of the Constitution of the Republic of South Africa."

Learning activity/ies - the CPD activities for which Continuing Education Units are obtained. There are two levels of activities: those with non-measurable outcomes; those with measurable outcomes

that do not necessarily constitute a full year of earned CEUs (including education, training, research and publications; and those associated with formally structured learning programmes.

Learning Portfolio (Level 2 Activity) - the record of a health practitioner's learning and selfdevelopment over time, reflecting the health practitioner's growth and improved practice.

National Accreditors Forum - the body which has representatives from among the Accreditors, and which meets regularly to deliberate on policy and issues of common concern. Feedback is provided to the HPCSA Professional Practice Committee.

Non-compliance - failure of an individual to comply with the requirements. There are various penalties, which will be applied in the event of non-compliance, by individual professional boards in collaboration with the Professional Practice Committee.

Practice Audit - it involves a health practitioner undertaking a systematic review of aspects of patient care and comparing these against explicit criteria.

Recognition of CEUs - it refers to the fact that if a CPD activity has been accredited by an Accreditor for a specific Professional Board, all health care professionals may attend that activity **if it is relevant to their specific scope of practice.** Health practitioners will therefore not need to apply for that activity to be re-accredited by their own Professional Board to claim the CEUs accrued for attending that activity.

Restoration after erasure - it occurs once the conditions for restoration to the register have been met. The conditions vary and depend upon the duration for which the health practitioner has been suspended from the register, and the requirements of the relevant Professional Board.

Service Providers - individuals/ institutions/ organisations/ societies who submit each of their learning activities to an accreditor for review and accreditation prior to presenting the CPD activity.

Shelf life - the period the CEUs will be valid for, which is 24 months from the date that the activity took place or ended, thus the CEUs have a 'shelf life' of 24 months.

1 ROLES AND RESPONSIBILITIES

There are several stakeholders involved in the process of CPD. This section describes the roles and responsibilities of various stakeholders in the CPD process including health practitioners.

1.1 HEALTH PRACTITIONER

The purpose of CPD is to assist health practitioners to maintain and acquire new and updated levels of knowledge, skills and ethical attitudes that will be of measurable benefit in professional practice. The aim is to enhance and promote professional integrity. The beneficiary will ultimately be the patient/ client. All registered health practitioners are required to complete a series of accredited continuing education activities annually. The activities are clustered together to represent a hierarchy of learning. Health practitioners may select activities at any level of learning that meet their particular needs and the demands of their practice environments.

Any health practitioner who registers for the first time as a health care professional <u>after</u> 1st January of a particular year will commence with his or her CPD programme immediately. When health practitioners who are actively practising in South Africa attend an accredited professional or academic meeting or activity abroad, it will be recognised for CPD purposes (see section 1). An Accreditor in South Africa should accredit the activity attended internationally if the activity is not accredited/ recognised for CEUs equivalent in the country where it was held.

Any health practitioner who is registered in a non-clinical category and still actively practicing must also meet the CPD requirements and adhere with regulations relating to the Registration of Health Practitioners Restricted to Non-clinical Practice [R.223 of 29 February 2008 (see section 8)].

1.1.1 Required Continuing Education Units (CEUs) per professional category

"Continuing education units" means the value attached to a learning activity for continuing professional development.

A health practitioner is required to engage in CPD and accumulate **CEUs** per twelve-month period of which a specific number of CEUs should be for ethics, human rights and health law (see table below). <u>All CEUs are valid for a period of 24 months</u> from the date that the activity took place/ <u>ended</u>. CEUs may not to be allocated retrospective.

Practitioners may obtain their units within their own discipline, speciality or sub-speciality or within another relevant discipline, speciality or sub-speciality that is relevant to their own professional practice.

The number of CEUs to be accumulated per year by health practitioners who are active on the register are stipulated per profession below:

Abbreviation	Register	Minimum number of TOTAL CEUs per year	Minimum CEUs for Ethics, Human Rights or Health Law	
	DENTAL THERAPY AND O	RAL HYGIENE		
DA	Dental Assistant	15	2	
TT	Dental Therapist	30	5	
ОН	Oral Hygienist	30	5	
DIETETICS AND NUTRITION				
DT	Dietitian	30	5	
SDT	Supplementary Dietitian	15	2	
NT	Nutritionist	30	5	
SNT	Supplementary Nutritionist	15	2	
EMERGENCY CARE PRACTITIONERS				
ANA	Ambulance Emergency Assistant	30	5	
ANT	Paramedic	30	5	
BAA	Basic Ambulance Assistant	15	2	
ECA	Emergency Care Assistant	15	2	
ECT	Emergency Care Technician	30	5	
ECP	Emergency Care Practitioner	30	5	
OECO	Operational Emergency Care Orderly	30	5	
ENVIRONMENTAL HEALTH				
Н	Environmental Health Practitioner	30	5	
HIA	Environmental Health Assistant	15	2	
FI	Food Inspector	15	2	

Abbreviation	Register	Minimum number of TOTAL CEUs per year	Minimum CEUs for Ethics, Human Rights or Health Law
	MEDICAL, DENTISTRY AND M	EDICAL SCIENCE	
AN	Anaesthetist Assistant	15	2
BE	Biomedical Engineer	30	5
СА	Clinical Associate	30	5
DP	Dentist	30	5
GC/GR	Genetic Counsellor	30	5
НА	Health Assistant	15	2
KB	Clinical Biochemist	30	5
MP	Medical Practitioner	30	5
MS	Medical Scientist	30	5
MW	Medical Biological Scientist	30	5
SMW	Supplementary Medical Scientist	30	5
PH	Medical Physicist	30	5
	MEDICAL TECHNO	DLOGY	
MT	Medical Technologist	30	5
GT	Medical Technician	15	2
SGT	Supplementary Medical Technician	15	2
LA	Laboratory Assistant	10	1
SLA	Supplementary Laboratory Assistant	10	1
OCCUPATIONAL THERAPY, MEDICAL ORTHOTICS AND PROSTHETICS AND ARTS THERAPY			
AT	Arts Therapist	30	5
AOS	Assistant Medical Orthotist, Prosthetist & Leatherworker	15	2
OSA	Orthopaedic Technical Assistant	15	2
ОТВ	Occupational Therapy Assistant	15	2
ОТТ	Occupational Therapy Technician	15	2
ОВ	Orthopaedic Footwear Technician	15	2
OS	Medical Orthotist and Prosthetist	30	5

Abbreviation	Register	Minimum number of TOTAL CEUs per year	Minimum CEUs for Ethics, Human Rights or Health Law
SOS	Supplementary Medical Orthotist Prosthetist	15	2
ОТ	Occupational Therapist	30	5
SOT	Supplementary Occupational Therapist	15	2
	OPTOMETRY AND DISPENS	ING OPTICIANS	
OD	Dispensing Optician	30	5
SOD	Supplementary Dispensing Optician	15	2
OP	Optometrist	30	5
SOP	Supplementary Optometrist	15	2
OR	Orthoptist	15	2
	PHYSIOTHERAPY, PODIATRY		
BK	Biokineticist	30	5
СН	Podiatrist	30	5
MA	Masseurs	15	2
РТ	Physiotherapist	30	5
ΡΤΑ	Physiotherapy Assistants	15	2
PTT	Physiotherapy Technicians	15	2
RM	Remedial Gymnast	15	2
SCH	Supplementary Podiatrist	15	2
SPT	Supplementary Physiotherapist	15	2
	PSYCHOLOG	Y:	
PM	Psychotechnician	15	2
PMT	Psychometrist	30	5
PRC	Registered Counsellor	30	5
PS	Psychologist	30	5
RADIOGRAPHY AND CLINICAL TECHNOLOGY			
DR	Radiographer	30	5
EE	Electro-Encephalographic Technician	15	2

Abbreviation	Register	Minimum number of TOTAL CEUs per year	Minimum CEUs for Ethics, Human Rights or Health Law
кт	Clinical Technologist	30	5
KTA	Assistant Clinical Technologist	15	2
KTG	Graduate Clinical Technologist	30	5
RLT	Radiation Laboratory Technologist	15	2
RSDR	Restricted Supplementary Diagnostic Radiographer	15	2
SEE	Supplementary Electro- Encephalographic Technician	15	2
SDR	Supplementary Diagnostic Radiographer	15	2
SKT	Supplementary Clinical Technologist	15	2
SRLT	Supplementary Radiation Laboratory Technologist	15	2
	SPEECH, LANGUAGE AND HEAP	RING PROFESSIONS	
AM	Audiometrician	15	2
AU	Audiologist	30	5
GAK	Hearing Aid Acoustician	30	5
SAU	Supplementary Audiologist	15	2
SGAK	Supplementary Hearing Aid Acoustician	15	2
SGG	Community Speech and Hearing Worker	30	5
SGK	Speech and Hearing Correctionist	30	5
SHA	Speech and Hearing Assistant	15	2
ST	Speech Therapist	30	5
SSTA	Supplementary Speech Therapist and Audiologist	15	2
STA	Speech Therapist and Audiologist	30	5
STB	Speech Therapy Assistant	15	2

1.1.2 Certificate of Attendance

<u>Issuance of CPD certificate is no longer mandatory.</u> CPD providers will provide attendance information to the HPCSA for every activity they have attended. They shall keep these for at least two years so that their certificates will be available, if required.

1.1.3 Requirements for practitioners registered in different boards

Health practitioners who are registered in two different professions or categories must meet the requirements of the boards that are applicable. Health practitioners registered in more than one category **within the same professional board** should only need to meet requirements for one category.

1.1.4 Cross Recognition of CEUs

If a CPD activity has been accredited by an Accreditor for a specific professional board, all health care professionals may attend that activity **if it is relevant to their specific scope of practice.** Health practitioners will therefore not need to apply for that activity to be re-accredited by their own professional board in order to claim the CEUs accrued for attending that activity already in the document at the definitions under **Recognition**.

1.1.5 CEUs obtained internationally

When health practitioners who are actively practising in South Africa attend an accredited professional or academic meeting or activity internationally, it will be recognised for CPD purposes. An accreditor in South Africa should accredit the activity attended internationally if not accredited/ recognised for CEUs equivalent in the country where it was held.

2 LEARNING ACTIVITIES

There are two levels of activities, those with non-measurable outcomes, those with outcomes that do not necessarily constitute a full year of earned CEUs, and those associated with formally structured learning programmes. A health practitioner may obtain CEUs at any level depending on personal circumstances and individual learning needs.

2.1 Level 1

2.1.1 Once-off activities

These are once-off activities and CEUs are allocated according to time, one CEU per hour to a maximum of eight CEUs per day. Presenters of such activities can be allocated double CEUs.

Presenters / co-presenters can only claim once for CEUs if the same activity is presented more than once.

These activities include:

- a. breakfast meetings or presentations;
- b. formally arranged hospital or inter-departmental meetings or updates;
- c. case study discussions;
- d. formally organised special purpose teaching/ learning ward rounds (not including routine service ward rounds);
- e. formally organised special purpose lectures that are not part of a business meeting;
- f. mentoring/supervision, peer supervision and activities that are specific to certain professions;
- g. conferences, symposia, refresher courses, short courses without a measurable outcome, international conferences;
- h. interest groups meeting regularly with a minimum of six meetings per year;
- i. morbidity and mortality meetings (one CEU per hour for both presenter and attendee); as well as
- j. Workshops, lectures, seminars on ethics (one CEU per hour)

2.1.2 Activities that are managed within rules of an accredited structure (HEI and/or Professional Organisations)

	Activity	CEUs
k.	Principal author of a peer reviewed publication or chapter in a book	15
Ι.	Co-author/ editor of a peer reviewed publication or chapter in a book	5
m.	Review of an article/ chapter in a book/ journal	3
n.	Evaluation and classification of Psychological Tests	5
o.(i)	Principal presenter/ author of a paper/ poster at a congress/ symposium/ refresher course	10
o.(ii)	Co-presenters/ co-authors of a paper/ poster at a congress/ symposium/ course/ refresher course	5
o.(iii)	Presenters of accredited short courses	10
o.(iv)	Co-presenters of accredited short courses	5
р.	Interactive skills workshop with an evaluation of the outcome	5
q.	All learning material (which could include DVD, CD, internet or email activities) with MCQs for evaluation with a pass rate of 70%	Refer to Annexure A
r.	Guest/ occasional lecturer at an accredited institution	3 per lecture
S.	External examiner of a Masters and/ or Doctoral thesis	5 per thesis
t.	External (independent) examiners/ moderators of all assessments	2 per appointment
u.	Reviewers of practice audit/ CPD learning portfolios	5
v.	Health personnel who supervise undergraduates/ interns/ postgraduates in clinical/ technical training in collaboration with an accredited training institution on a regular basis during the academic year (if not in job description)	(two per student) (max sixteen CEUs per calendar year).
w.	Single modules of Masters degrees with part-time enrolment for study for non-degree purposes	5 CEU'S are given only if the module was completed and passed.
х.	Professional Interest Groups (this could include Journal Clubs if compliant with the criteria) that are formally constituted and present a regularly recurring programme that extends for one year with a minimum of six meetings per year. These activities have a measurable outcome according to criteria in Annexure A	Up to 3 per meeting

This level comprises structured learning, i.e. a formal programme that is planned and offered by an accredited training institution, evaluated by an accredited assessor and has a measurable outcome.

Activities include:

No prior approval by an accreditor necessary

(a) postgraduate degrees, diplomas and certificates that are recognised as additional qualifications by the relevant professional board – at the end of each year of study (not exceeding the normal duration of the degree); thirty CEUs may be claimed upon submitting an academic report on progress, and additional thirty CEUs may be claimed on successful completion of the qualification;

Prior approval by an accreditor necessary

- (b) short courses with a minimum of 25 hours with additional clinical hands-on training, plus a formal assessment of the outcome – successful completion of an activity at this level will earn thirty CEUs; and
- (c) short courses less than 25 hours, with a measurable outcome (1 CEU per hour).

Other Activities:

Guidelines for the latter two activities are available on the HPCSA website. Health practitioners will need to submit documentation/ portfolios to an accreditor to obtain the thirty CEUs for these activities.

- (d) learning portfolios; and
- (e) practice audit.

3 ACTIVITIES THAT DO NOT QUALIFY FOR CEUS

The following activities do not qualify for CEUs:

• time spent in planning, organising or facilitating any activity;

- published congress proceedings;
- non-referenced letters to the Editor of accredited journals;
- daily ward rounds;
- written assignments;
- compilation of student training manuals for internal use;
- staff and/ or administrative meetings;
- tours and/ or viewing of exhibits and technological demonstrations;
- membership of professional bodies, professional boards or associations;
- holding a portfolio on the professional body's executive or council structure;
- presentations and publications to the public; and
- Mandatory Health and Safety Training at laboratories, which is part of the curriculum (specifically applies to Medical Technology).

Meetings arranged by pharmaceutical companies and manufacturers or importers of products and technical devices (including assistive device technology) or their representatives purely for the purpose of **marketing and/ or promoting their products** are not eligible for accreditation. Activities for the purpose of training in the use of company products or technological devices may be presented by arrangement with an accreditor or accredited service provider.

4 NON-COMPLIANCE

4.1 Health practitioners who are not compliant

The names of *bona fide* non-compliant health practitioners will be submitted to the relevant professional boards, which might take any of the following actions:

- changing the category of registration to supervised practice; until proof of compliance with the CPD requirements are submitted;
- successfully passing a Board Examination;
- suspension from the register until submission of proof of compliance with the CPD requirements is submitted; or
- any other resolution by the relevant professional board.

5 DEFERMENT

Health practitioners may apply for deferment of CPD and the Professional Practice Committee will review such applications individually on an *ad hoc* basis. The application should be strongly motivated with appropriate evidence/ documentation.

Deferment may be granted in the case of:

- a) a health practitioner who is outside South Africa for a period of time exceeding twelve months **and is not practising his/ her profession**; and
- b) a health practitioner who is outside of South Africa and practising in a country where there is no access to CPD activities.

Deferment may be granted for a maximum period of three years. Deferment will not be granted for a period of less than twelve months (in view of the fact that a professional may collect CEUs in a following year).

Any health practitioner mentioned in the above paragraphs wishing to re-enter the system after deferment will be subject to the following conditions:

- if deferment was granted for more than twelve months but less than two years, proof of full employment in the profession during that time should be submitted and the health practitioner will, on review by the HPCSA CPD Committee, be allowed to recommence the CPD year immediately;
- if deferment was granted for more than two years but less than three years, the health practitioner must submit proof of his/ her employment during that time and the health practitioner will, on the recommendation of the HPCSA CPD Committee, be required to complete a period of supervised practice as determined by the professional board in his/ her area of practice, and will recommence the CPD year immediately;
- if deferment was granted for longer than twelve months and the health practitioner did not practice his/ her profession during the deferment period, he/she will be required to complete a period of supervised practice as determined by the professional board in his/ her area of practice; or

 if deferment was granted because the health practitioner was engaged in formal education and training for an additional qualification, CEUs will not be allocated for obtaining the said additional qualification. Proof of the additional qualification must be supplied to the CPD Section and the health practitioner will recommence the CPD year immediately.

6 HEALTH PRACTITIONERS ABROAD

Health practitioners who are practising abroad in countries where a continuing professional development system is in place **should comply** with the requirements in that country and retain documentary proof of attendance at CPD activities for submission and submit a letter from the licensing authority confirming compliance/certificates via the online portal. For re-registration purposes, documentary proof of compliance must be submitted for continuing professional development purposes in South Africa. This proof may be in the form of a letter from the accrediting authority in the country concerned.

7 RETIREMENT

Retired health practitioners who are active on the register should be compliant with CPD.

8 NON-CLINICAL REGISTER

Request for placement on the non-clinical register will only be considered with the relevant application form and affidavit.

9 COMMUNITY SERVICE

Health practitioners in community service do not have to comply with CPD during community service but are encouraged to attend and may accrue CEUs, which will be to their credit for the full 24 months from date of accrual.

ANNEXURE A: Journal, Articles and Online Activities (not older than 5 years)

1. Objectives of this Guideline

This guideline aims to address any matter, which relates to education at online CPD events, as well as the regulation of any CPD activities, both physical and virtual, and should be read in conjunction with the general CPD guidelines.

2. Journals with multiple choice questions (MCQs)

The content can be clinical or ethical in a peer reviewed/ non-peer reviewed journal or stand-alone activity. For every five questions, one CEU may be granted with a maximum of three CEUs per journal volume, regardless of whether the content is clinical or ethical.

3. Pass mark

The mark of 70% is required for the award of MCQs based points.

4. Criteria of content

- clear and concise, reflecting understanding;
- each MCQ question must contain a minimum of three options, and may be of the 'single-correct answer' or 'single-best' formats;
- all the questions in the MCQs cannot be true/ false maximum 20%; and
- should contain no commercial product promotion and/ or satire.

5. Online CPD activities

Online CPD activities that can be accredited include Level 1 - 2 as per CPD Guidelines.

6. Other activities held online include but are not limited to:

- workshops;
- webinars and lectures;
- profession related courses; as well as
- electronic journals' articles with measurable outcomes.

7. Provisions regarding the accreditation of online CPD activities

- Providers have to substantiate the number of hours and CEUs that they are applying for and provide proof of methods of assessment.
- Providers have to describe to the satisfaction of the accreditors the technologies to be employed.
- The accreditation is provided on the time allocations substantiated by the provider and not in accordance with the time spent by a specific participant – i.e. if according to the provider it will take one hour to complete a questionnaire/ module, the participant cannot request additional points for time spent longer than one hour.
- Activities online for longer than three hours are allocated points according to time i.e. one CEU per hour, to a maximum of six CEUs per day (clinical content). At least one assessment comprising of MCQs should be completed after six hours of activity and should be completed with a mark of 70% in order to claim CPD accreditation.