Oral report

Oral report



9.02

9.03

Standards Committee

**VN Disciplinary Committee** 

## Veterinary Nurses Council Agenda for meeting to be held on Wednesday 12 February 2020 at 10.30am

1.	Apolo	Apologies for absence									
2.	Decla	Declarations of interest									
3.	.Obitu	aries									
4.	Minut	tes of meeting held on 13 November 2019	Paper attached								
5.	Matte	ers arising									
6.	CEO	update	Oral report								
Matters	for deci	sion by VN Council and reports from Committees									
7.	VN E	ducation Committee									
	Minute	es of meeting held on 8 January 2020	Paper attached								
8.	Conti	nuing Professional Development									
	8.01	CPD Audit 2019	Paper attached								
	8.02	CPD Referral Group	Paper attached								
	8.03	CPD Working Party	Paper attached								
Matters	of note										
9.	Repo	rts from RCVS Committees									
	9.01	VN Preliminary Investigation Committee	Paper attached								

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.10. VN Register report

Registrations, removals and student enrolments Paper attached

.11. Communications report Oral report

.12. VN Council election Oral report

.13. Any other business

.14. Date of next meeting

Wednesday 6 May 2020 at 10.30am

Confidential and private items

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Meeting	Veterinary Nurses Council
Date	12 February 2020
Title	Veterinary Nurses Council Minutes November 2019
Classification	Unclassified
Summary	Minutes of the meeting of Veterinary Nurses Council (VNC) held on 13 November 2019
Decisions required	None
Attachments	None
Author	Annette Amato Committee Secretary 0207 202 0713 a.amato@rcvs.org.uk



## **Veterinary Nurses Council**

#### Minutes of the meeting held on 13 November 2019

Members: Mrs Belinda Andrews-Jones

Miss Alison Carr Ms Elizabeth Cox Miss Jane Davidson Mr Dominic Dyer Dr Joanna Dyer

Ms Wendy Drinkwater Ms Lucie Goodwin Mrs Susan Howarth Mrs Andrea Jeffery Mrs Katherine Kissick

Miss Racheal Marshall -

Professor Susan Proctor

Mr Matthew Rendle - Vice-Chair

In attendance: Mrs Annette Amato - Committee Secretary

Mr Luke Bishop - Senior Communications Officer
Mrs Julie Dugmore - Director of Veterinary Nursing

Chair

Ms Eleanor Ferguson - Registrar

Mrs Victoria Hedges - Examinations Manager
Mr Ian Holloway - Director of Communications

Mrs Lily Lipman - Senior Practice Standards Manager

Ms Lizzie Lockett - Chief Executive

Mr Felix Michaux - Lead Software Developer

Mr Joanne Stetzel - Marketing Communications Manager
Dr Greer Wild - Policy and Public Affairs Officer

#### Apologies for absence

Apologies for absence were received from Dominic Dyer, Andrea Jeffery and Susan Proctor.

#### **Declarations of interest**

 Katherine Kissick declared that she had been appointed as a member of the accreditation visitor panel to the University of Glasgow and the University of Portsmouth in 2020.

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#### **Obituaries**

3. No written obituaries had been received. Council stood to observe a minute's silence for all members and associates of the College who had passed away since the last meeting.

#### Minutes of the meeting held on 11 September 2019

4. The Minutes of the meeting held on 11 September 2019 were accepted as a correct record.

#### **Matters arising**

- 5. **Extra Mural Studies (EMS) placements.** The Director of Veterinary Nursing is looking into ways to incorporate EMS placements for veterinary nurse students at the RCVS, without compromising their required clinical training hours.
- 6. **VN Education Committee membership**. The Chair and Director of Veterinary Nursing would review the process for selecting members of the VN Education Committee, and bring forward proposals to the next meeting.

Action: Chair and Director of Veterinary Nursing

#### **Update on operational matters**

- 7. The CEO presented her update report which had been provided to RCVS Council the previous week, outlining the progress with the actions set out in the 2017-19 Strategic Plan. Some of the objectives outlined in the plan would be incorporated into the new Strategic Plan, which would be presented later in the meeting.
- 8. The CEO highlighted the very successful VN Day, held at London Zoo in October, where 175 new veterinary nurses were welcomed to the profession and nine Diplomas in Advanced Veterinary Nursing were bestowed. The event in October had also included an inspirational address from Hayley Walters, a former recipient of the VN Golden Jubilee Award.

#### RCVS Accreditation Standards for Veterinary Nursing licence to practise qualifications

- 9. The Director of Veterinary Nursing presented the finalised version of the RCVS Standards Framework for veterinary nurse education and training, which incorporated all the amendments as agreed by VNC at its previous meeting. The final version still required some formatting changes which would be dealt with by the Comms department.
- 10. It was confirmed that following discussion on the requirement that the programme team should be led by a veterinary nurse, the term 'Programme Lead' had been used for this role. A definition was provided in the Glossary.
- 11. In response to a query regarding the provision of evidence that adequate finances are in place and are sufficient to sustain and develop the programme, it was confirmed that it is a matter for the awarding organisation or university to evidence the demand for the programme by showing

- that there is a market for their provision, and the accreditation visitor panel would review the evidence provided. A number of other minor points were queried and clarified.
- 12. Council ratified the revised standards and thanked the Working Group, in particular Katherine Kissick and the Director of Veterinary Nursing, for all their hard work in developing the revised standards. It was confirmed that the new standards would be available from January 2020, but those awarding organisations and universities already working towards accreditation or reaccreditation based on the current standards would be able to continue. The Director of Veterinary Nursing added that a robust training package for accreditation visitors was being developed by the Qualifications Manager.

#### **VN Education Committee (VNEC)**

- 13. Susan Howarth, Chair of the VNEC, presented the report of the meeting held on 14 October 2019, and highlighted the following points:
- 14. The Committee had learned that some students have already been registered by their colleges on to the new apprenticeship standard. This may cause a potential funding problem for the colleges, as the arrangements for the End Point Assessment (EPA), which is a requirement to obtain completion funding, are not currently in place. The students will be able to complete their licence to practise qualification and on meeting the RCVS requirements will be able to register, but if they are unable to complete the EPA, this will have a potential impact on the funding to the centres and employers. It was not known how many students had already been registered on to the standard and would complete their licence to practise qualification before the EPA arrangements are in place. It was reiterated that this is not an issue in which the RCVS has any involvement.
- 15. The Committee had considered a number of routine monitoring reports and action plans, and had made three additional appointments to the accreditation visitor panel.

#### **Continuing Professional Development (CPD)**

- 16. **CPD Audit 2019.** Council noted a paper summarising the results of the 2019 audit of CPD records of veterinary nurses. The full details of the audit will be presented to Council in February. It was noted that the response rate was 95% and compliance was 79%, both of which are higher than in previous years. In the random sample the response rate was 98% and compliance was 90%. Reasons for non-compliance are similar to previous years, mainly parental leave, family commitments, illness and lack of access to CPD.
- 17. **CPD Referral Group.** Alison Carr presented the update from the CPD Referral Group, including the minutes from the meeting on 2 October 2019, and the updated CPD policy for 2020 with guidance notes.
- 18. It had been agreed that veterinary nurses could request to remain on the register but pause their CPD for a period of up to six months in certain circumstances, and that these requests would be reviewed on a case by case basis. The referral group was developing a flow chart which would

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assist in making these decisions. It was commented that the wording in the guidance note on this point needed further clarification, to ensure that it did not encourage veterinary nurses to believe it was possible to apply for a number of pauses in succession. It was also agreed that it would be useful to include reference to the Period of Supervised Practice requirements in the guidance document.

Action: Refer back to CPD Officer

- 19. Council was asked to clarify its intentions regarding the agreement to waive the restoration fee for any veterinary nurse who had voluntarily removed their name from the register, but returned after a time period of between 6 18 months. It had been suggested that this should be reworded to allow the restoration fee to be waived for any veterinary nurse who had chosen to remove their name voluntarily from the register for up to 18 months. It was confirmed that this would not apply for nurses who had been removed for non-payment of the annual fee. It was also confirmed that although the restoration fee would be waived, payment of the relevant annual fee would still be required.
- 20. It was noted that the voluntary removal form requires a reason for the removal to be provided.
- 21. On a vote being taken, it was agreed by 10 votes in favour, with one against and no abstentions, that any veterinary nurse who removes their name voluntarily from the register for a time period of up to 18 months should not be required to pay a restoration fee in order to return to the register.
- 22. **CPD Working Party.** The Marketing Communications Manager introduced the paper setting out the communications plan for promoting the changes to the CPD policy, including the key themes and objectives. There had been 460 visits to the new webpage following the British Veterinary Nursing Association (BVNA) Congress in early October, and the first structured feedback survey would take place in the next few days. The new version of the 1CPD App is currently in the last phase of piloting ready for launch in January 2020. The full roll-out would take place in mid-January, when the current PDR (Professional Development Record) content would be migrated across. Further functionality to include the PDP (Professional Development Phase) and NPL (Nursing Progress Log) would be incorporated in the future.
- 23. **1CPD App.** The Lead Software Developer gave a presentation on the new 1CPD App, which was very well received.

#### **Reports from RCVS Committees**

#### Registered Veterinary Nurse Preliminary Investigation Committee (RVN PIC)

24. Council noted the report on the work of the RVN Preliminary Investigation Committee. The meetings scheduled to take place on 3 September and 15 October had been cancelled as there were no new cases referred and no decisions required on ongoing cases. The next meeting of the RVN PIC was scheduled to take place on 25 November 2019.

#### **Standards Committee**

25. Mrs Andrews-Jones provided a brief update on the meeting of the Standards Committee held earlier in the week, including information on edits to the Practice Standards Scheme (PSS) and amendment of the PSS rules to clarify arrangements on regarding data sharing. The Committee had also approved a recent batch of Schedule 3 case studies which had been prepared to supplement the first batch of case studies published in 2018, to assist the professions regarding delegation under Schedule 3.

#### **VN Disciplinary Committee**

26. There had been no meetings of the VN Disciplinary Committee since the previous meeting of Council, and no new cases had been referred.

#### **Practice Standards Group (PSG)**

- 27. The Senior Practice Standards Manager reported that the minutes of the recent meeting of the PSG had not yet been ratified. The Group had reviewed the edits to the Small Animal Standards, and the Farm Animal and Large Animal standards would be reviewed in 2020.
- 28. The Practice Standards Awards ceremony was held at the BVNA Congress on 11 October, and had been very well attended.
- 29. The Director of Communications presented the new digital campaign to raise awareness of the Practice Standards Scheme 'Veterinary care from your kind of vets', due to be launched in the next week. There were a number of questions and positive comments from Council members.

#### **Period of Supervised Practice report**

- 30. Council noted a report on the number of veterinary nurses who have undertaken a Period of Supervised Practice (PSP) and restored to the Register of Veterinary Nurses, those currently undertaking a PSP and the numbers who have been exempted from the PSP. The PSP is a requirement for veterinary nurses returning to the RCVS Register following a period of absence totalling five years or more, and for any person wishing to Register as a veterinary nurse who has achieved a veterinary nursing qualification and not registered within five years of qualification.
- 31. The Director of Veterinary Nursing proposed that there should be a review of the PSP system, which has now been in place for a number of years. It was agreed that a paper should be brought to the next meeting.

Action: VN Department

#### Communications report

- 32. The Senior Communications Officer reported on recent relevant activities.
- 33. The development of the VN Futures website is now well under way, with the objective being to finalise the content and launch the site within the next few months. There would be a training

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meeting the following week for the VN Futures Ambassadors Pilot, followed by a press release.

- 34. There was continuing publicity and promotion around the CPD policy changes, including videos, a webinar and podcasts. Further development work was taking place to provide guidance on the reflection aspects of the new CPD system.
- 35. The promotional information for the 2020 VN Council election was being prepared and should be available by the end of the following week. The deadline date for nominations is 31 January 2020. There would be additional publicity in VN Times and Miss Davidson was preparing a blog. Any other VN Council members who wished to be involved in video pieces were asked to contact the Comms department.
- 36. The 'SUPERB' checklist poster, developed to help with the key points veterinary surgeons need to consider when delegating work to registered and student veterinary nurses, was now available to download from the RCVS website, and would be available in hard copy in due course.
- 37. The next edition of *VN Education* would be published in early 2020, the main item being the new Accreditation Standards.
- 38. The RCVS had attended the Emergency and Critical Care (ECC) Congress the previous week and had received positive feedback on the CPD policy changes. The RCVS would have a stand at the London Vet Show on 14 and 15 November.

#### Any other business

- 39. The Chair drew attention to an issue which had come to light through the veterinary nursing social media, regarding concerns expressed by a very recently qualified veterinary nurses who had then received their annual fee notice for 2020 within a few weeks of initial registration.
- 40. It was confirmed that the initial registration fee comprises a one-off fee to cover the registration, badge and certificate, plus a proportion of the annual fee for the current year. Nurses registering in the second half of the fee year pay a lower fee than those registering in the first part of the year.
- 41. The Chair confirmed that she would raise this with the Registration Department and request that the communications around this be reviewed.

Action: Chair to raise with Registration Department

#### Date of next meeting

42. Wednesday 12 February 2020 at 10.30am



Meeting	.Veterinary Nurses Council
Date	.12 February 2020
Title	Veterinary Nurse Education Committee
Classification	Unclassified
Summary	Minutes of the meeting of the VN Education Committee held on 8 January 2020
Decisions required	To approve
Attachments	None
Author	Annette Amato Deputy Head of Veterinary Nursing 0207 202 0713 a.amato@rcvs.org.uk



# **Veterinary Nurse Education Committee Minutes of the meeting held on 8 January 2020**

Members:	Mrs Donna Cotton	-	Employer representative
	Miss Julia Cox		Employer representative
	Miss Hannah Durling	-	HE student representative
	Mrs S Holman	-	FE veterinary nursing provider
	Mrs Susan Howarth	-	VN Council veterinary nurse (Chair)
	Professor Elizabeth Mossop	-	Independent educationalist
	* Mrs Sarah Parkhouse	-	FE veterinary nursing provider
	Professor Susan Proctor	-	VN Council lay member
	Mrs S Reynolds-Golding	-	HE veterinary nursing provider
*absent			
In attendance:	Mrs Annette Amato	-	Committee Secretary
	Mrs Denise Chambers	-	Qualifications Officer
	Mrs Julie Dugmore	-	Director of Veterinary Nursing
	Miss Shirley Gibbins	-	Qualifications Manager
	Mrs Victoria Hedges	-	Examinations Manager
	Miss Sian Tanner	-	VN Education Officer
	Miss Michad Wildman	-	Examinations Officer

Apol	ogies for absence
1.	Apologies for absence were received from Sarah Parkhouse.
Decla	arations of interest
2.	Susan Howarth declared that she had been an external academic member of the visitation panel for the Royal Veterinary College re-accreditation event and would not participate in the discussion on this item.
Minu	tes of the meeting of the Education Committee (VNEC) held on 14 October 2019
3.	The Committee noted the minutes of the meeting held on 14 October 2019, which had been circulated and approved, prior to submission to VN Council at its meeting in November 2019.
Matte	ers arising on the Minutes
4.	It was reported that the issue of whether Royal Veterinary College (RVC) candidates were enrolling onto an unaccredited BSc programme has now been resolved. The RVC has now

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	made it clear on the enrolment forms that students are enrolling onto an accredited FdSc with the option to complete a BSc as a top up award.
Veteri	nary Nursing update
4.	The Director of Veterinary Nursing updated the Committee on recent developments and activities.
5.	VN Department. Enrolments are progressing well. There has been a change in the temporary member of staff supporting enrolments until the end of January.
6.	Awarding Organisations. A general update was provided on the three awarding organisations awarding the Level 3 Diploma.
7.	University of Wales Trinity St David. The university has not submitted any further appeal against the terminal accreditation status decision. The students have been notified, and the university will continue to be monitored until all current students have completed. Students will be required to pass the RCVS pre-registration examination before being permitted to enter the veterinary nurse register.
8.	Apprenticeships. Following discussion with the Institute for Apprenticeships, the wording in the assessment plan will be clarified. The Director of Veterinary Nursing will develop some wording for the RCVS website on funding and apprenticeships, with the relevant links included.
9.	NPL and Day One Skills/Competences Roadshow. The Director of Veterinary Nursing and Qualifications Manager had carried out a week-long roadshow at the end of November to obtain feedback from users of the Nursing Progress Log to inform development of the new inhouse recording tool. In the main, the feedback had been positive and some additional useful comments had been made. The IT developers are now working on the new tool.
10.	The comments on the revised Day One Skills and Competences for veterinary nurses at the roadshows had also generally been positive.
11.	RCVS Accreditation Standards for Veterinary Nursing licence to practise qualifications. VN Council had ratified the new accreditation standards at its meeting in November, and these are now being prepared for publication and should be available by the end of January. It was confirmed that Awarding Organisations (AOs) and Higher Education Institutions (HEIs) currently working towards accreditation/re-accreditation would be able to map to either standards, with the new standards being implemented in full by the summer and for the new student intake in September.
VN Lic	cence to practise qualifications
New a	ccreditations

- University of Glasgow. The Qualifications Manager confirmed that the accreditation was being re-presented to the Committee due to a misunderstanding regarding the programme onto which the students are being enrolled. At a routine quality monitoring visit in October 2019, it had come to light that students were being enrolled onto the BSc(hons) Veterinary Nursing programme, which is not currently accredited. The University has confirmed that both the BSc and the BSc(hons) are fully validated, and the full evidence and visit report were presented to the Committee. It was noted that the accreditation of both programmes had been requested during the initial application. Although it was indicated in the accreditation letter that only the BSc ordinary was accredited, the University had been under the impression this covered both programmes as the licence to practise requirements are covered during the BSc time frame.
- 13. The Committee agreed unanimously that the BSc(hons) programme in veterinary nursing should receive provisional accreditation, in addition to the BSc veterinary nursing.
- 14. A query was raised by the Chair regarding the number of credits indicated in a section of the report, and it was agreed that this should be checked.

#### Reaccreditations

15. **Royal Veterinary College**. The Committee received the report from the accreditation event for the Royal Veterinary College FdSc in Veterinary Nursing, held on 30 – 31 July 2019. It was noted that actions arising from the event are being monitored and that these are being addressed. It was agreed that reaccreditation for the FdSc in veterinary nursing should be granted.

#### Changes to accreditation status

- Oxford Brookes University. The Examinations Manager reported that she had carried out an advisory visit to observe the mock OSCE in November 2019, as the university will be considered for full accreditation in 2020 when the first cohort of students is due to graduate. It was noted that there are only three students in the final year.
- 17. The Committee discussed in general terms the issues and difficulties in making accreditation decisions based on very low student numbers, and it was noted that programme size had been included as a factor for consideration in the RCVS risk policy. It was also noted that now the new accreditation standards have been agreed, accompanying policies and procedures will be developed which will address the issue of the different accreditation statuses currently used.

#### **Quality Monitoring activities**

- 18. The Committee noted reports on the ongoing quality monitoring activities for the following AOs and HEIs:
  - Anglia Ruskin University
  - College of Animal Welfare (North London)
  - City & Guilds

North Highland College Salford City College University of Brighton University of South Wales 19. The Committee was asked to provide guidance on how to proceed in the case of centres failing to respond to requests for confirmation of the factual accuracy of a draft visit or quality monitoring report. It was pointed out that the accreditation handbook states that the AO or HEI will be given 21 days to comment on the accuracy of the report. If no comments are made and the signed report is not returned within 21 days of receipt it will be assumed that the contents have been accepted. 20. It was agreed that any AO/HEI or centre not responding to a request for confirmation of the factual accuracy of a report should be reminded of the guidance, and given a deadline date to respond, after which time it would be assumed that the report is accurate. Action plan monitoring – accreditation and reaccreditation 21. The Committee was provided with individual updates on the auditing activity and progress with action plans, following a number of accreditation and reaccreditation events. In the majority of cases, there was nothing specific to note and action plans were being met or had been achieved, according to the agreed timetables. Action plan monitoring quality assurance 22. Bridgwater and Taunton College. Following the routine quality monitoring visit carried out in July at Bridgwater and Taunton College, the actions are being monitored, and further evidence was submitted in November. A further City &Guilds visit to the centre was due in December 2019. AO / HEI External Examiner update 23. The Committee noted the current list of External Examiners, together with full details of a newly appointed External Examiner for the University of South Wales. It was agreed that the university should be contacted to confirm its criteria, so that the appointment can be checked against these criteria. It was noted that further update information was awaited from four universities with External Examiner appointments which had ended in 2019. Post-registration qualifications 24. Quality Monitoring. It was reported that Harper Adams University had now completed all actions requested for the accreditation of its CertAVN programmes.

intending to apply for accreditation, covering a wide variety of programmes. Two

**Certificate in Advanced Veterinary Nursing Accreditations.** The Director of Veterinary Nursing reported that expressions of interest had been made by a number of institutions

25.

accreditations are due to take place within the next few weeks. It was agreed that the information on the Certificate should be further promoted on the website, and it was noted that an FAQ was being developed. Links to the current provider are included on the website.

#### **VN Futures**

26. In response to a query, it was confirmed that the different career paths are being promoted on the VNFutures section of the VetFutures website, with a number of case studies. An interim report on the work of VN Futures is currently being prepared. The RCVS website will have a link to the VN Futures website once this has been developed as a separate website.

#### **Pre-registration Examination Board**

The Committee had agreed the revised Terms of reference at its previous meeting, including confirmation that the Board should be chaired by a member of the VNEC with knowledge of assessment. Professor Mossop, who had chaired the previous VN Examinations Sub-Committee, agreed to chair the Board. It was further agreed that the terms of reference should be amended to the effect that one of the two deputy chairs should also be a member of the VNEC.

#### Items for publication

28. It was noted that the next edition of *VN Education* was due to be published in the next few weeks, with the main item for inclusion being the revised accreditation standards. There were no items for publication arising from the meeting.

#### Any other business

- 29. **Accreditation visitors**. The Qualifications Manager encouraged members to continue to suggest potential visitors to be considered for the accreditation panels, including students (both FE and HE), employer representatives and clinical coaches.
- 30. **Schools Ambassadors**. It was reported that there had been a schools ambassador training day held at the RCVS in November as part of the VN Futures project. This had been attended by a STEM Ambassador, who had been very helpful. Several of the schools ambassadors would also be involved as STEM ambassadors.
- 31. **Fitness to Practise issues.** The Director of Veterinary Nursing agreed to look into the issue of how to flag fitness to practise issues in the case of students being removed or withdrawn from an accredited qualification.

#### **Meeting dates**

32. The meeting dates for the forthcoming meetings of the Committee in 2020 were confirmed as follows:

Wednesday 25 March 2020 Wednesday 29 July 2020 Wednesday 14 October 2020



Meeting	Veterinary Nurses Council
Date	.12 February 2020
Title	2019 Monitoring of Registered Veterinary Nurses' CPD
Classification	Unclassified
Summary	This paper provides the analysis of the 2019 audit of CPD records of veterinary nurses.
Decisions required	Agree the suggestions for the 2020 CPD audit
Attachments	Annex A – further analysis of results
Author	Jenny Soreskog-Turp Senior Education Officer 0207 202 0701 j.soreskog-turp@rcvs.org.uk

#### **Background**

1. In November 2019, VN Council received a paper about the initial findings of the 2019 CPD audit of Veterinary Nurses. This paper contains the full analysis of records and raises some of the issues that have been identified through the audit process.

#### Outcomes of the audit

- 2. Responses were received from 1077 veterinary nurses (95%):
  - a. 854 RVNs whose records show that they are compliant with the CPD requirement of 45 hours over three years (79 % of respondents).
  - b. 223 RVNs whose records show that they are not currently compliant with the CPD requirement (21%).
- 3. 52 RVNs have not responded to either the initial letter requesting their records or to the subsequent reminders.
- 4. Annex A provides a further analysis of the audit results.

#### Non-compliance

- 5. 223 RVNs were not compliant with CPD requirement of 45 hours over 3 years. 27% did not give any reason for being non-compliant. The main reasons for non-compliance were:
  - a. Maternity leave (25%) (28 % in the 2017 audit)
  - b. Family Commitments (15%)
  - c. Illness (14%)
  - d. Time/opportunity (6 %)
  - e. Removed name from register (5%)
  - f. Lost records/Not recorded (5%)
  - g. Not working (4%)
- 6. Any RVN that did not reach the CPD requirement will be included in this year's audit. VN Council decided last year that any RVN that has been included in three audits but are still non-compliant should be referred to the CPD Referral Group, which means that 43 RVNs will be referred from last year's audit.
- 7. RVNs that were non-compliant, recorded an average of 26 hours over the three years compared to 101 hours for compliant RVNs.

#### Non Respondents

8. 52 (5%) RVNs did not respond to any communication from the RCVS regarding their CPD, which is similar to the last couple of years when 6 and 7% did not respond.

9. 11 RVNs have been included in at least three audits and not responded to last year's request and will therefore be referred to the CPD referral group.

#### **Analysis of CPD records**

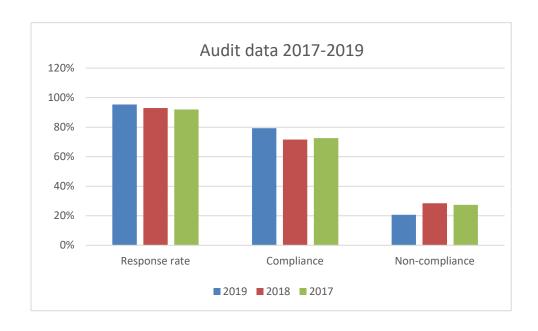
- 10. The average number of hours across all the groups was 82. The range of hours was 0-1837. Whilst 1837 was the maximum number of hours recorded in the 3-year period covered by the audit, there were five records that showed more than 1000 hours of CPD.
- 11. The breakdown of CPD hours by age groups shows that compliance is higher for the youngest group (96%), and the 48-52 year olds with 79% compliance. These two age groups were also the groups with the highest number of compliance in the 2018 audit. Non-compliance is highest amongst 58-81 year olds (31%), while most other age groups have a non-compliance between 21-28%.
- 12. The breakdown of CPD hours by the number of years on the register show that compliance is highest in the group that have been 3-6 years on the register (83%). RVNs that had been on the register between 20-30 years had a 79% compliance rate and for all other groups compliance is between 73-64%.
- 13. The most popular CPD activity was lecture by external provider which accounted for 21% of all hours recorded. 64% of all hours recorded were different forms of formal CPD activities.
- 14. 88 % of respondents used the PDR to record their CPD which is a small increase from the audit in 2018 when 85% were using the PDR.

#### **Next steps**

- 15. It is suggested that the next audit of CPD records will take place in June 2020 and include:
  - a. A random sample of 10% of RVNs on the register
  - b. RVNs who submitted a return in 2019 but fell some hours short of the overall requirement.
  - c. RVNs who, despite reminders, failed to respond to requests to submit their CPD records in 2019, and yet remain active on the Register of Veterinary Nurses.
  - d. RVNs who confirmed that they were not compliant with the CPD Requirement at the annual renewal.

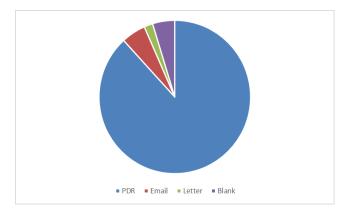
Annex A

	Included in sample	Responded Compliant		Non-compliant (NC)			
Total 2019	1129	1077	95%	854	79%	223	21%
Total 2018	1016	939	93%	672	72%	267	28%
Total 2017	857	792	92%	575	73%	217	27%
Total 2016	627	591	94%	420	71%	171	29%
Total 2015	798	739	93%	574	78%	165	22%
Total 2014	814	718	88%	556	77%	162	23%



	Included in sample	Resp	oonded	Compliant		Compliant Non-compliant (NC)		npliant (NC)
Group 1	773	761	98%	688	90%	73	10%	
Group 2	180	159	88%	98	62%	61	38%	
Group 3	58	45	78%	21	47%	24	53%	
Group 4	118	112	95%	47	42%	65	58%	
Total	1129	1077	95%	854	79%	223	21%	

Records received								
PDR	950	88%						
Email	56	5%						
Letter	20	2%						
Blank	51	5%						

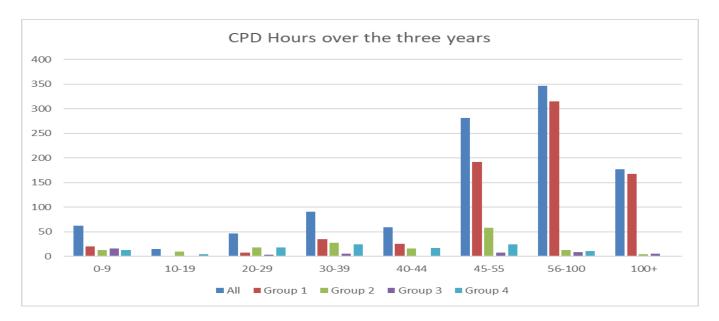


Average number of CPD Hours over 3 years									
				Non-			Group		
	All		Compliant	Compliant	Group 1	Group 2	3	Group 4	
		82	101	26	99	42	44	36	

CPD Hours over the three years								
	All	Group 1	Group 2	Group 3	Group 4			
0-9	62	20	13	16	13			
10-19	15	1	10	0	4			
20-29	46	7	18	3	18			
30-39	91	35	27	5	24			
40-44	59	25	16	1	17			
45-55	281	192	58	7	24			
56-100	347	315	13	8	11			
100+	177	167	4	5	1			

Range: 0-1836.8,

Avg:82



·		
Maternity leave	53	24%
Family Commitments	32	15%
Illness	30	14%
No Time Opportunity  Lost records	13	6% 5%
Lost records	12	5%
Remove name from register	12	5%
Not working	8	4%
No reason	60	27%

## CPD Breakdown by years on the register

	Total	0-9	10-19	20-29	30-39	40-44	45-54	55-99	100+	NC	С
03-06	237	6	3	11	12	8	63	84	50	40	197
		3%	1%	5%	5%	3%	27%	35%	21%	17%	83%
07-12	315	20	6	19	34	19	76	92	49	98	217
		6%	2%	6%	11%	6%	24%	29%	16%	31%	69%
13-19	268	13	3	11	28	18	56	95	44	73	195
		5%	1%	4%	10%	7%	21%	35%	16%	27%	73%
20-30	212	16	3	5	12	9	60	75	32	45	167
		8%	1%	2%	6%	4%	28%	35%	15%	21%	79%
31-53	45	7	0	0	5	4	9	16	4	16	29
		16%	0%	0%	11%	9%	20%	36%	9%	36%	64%

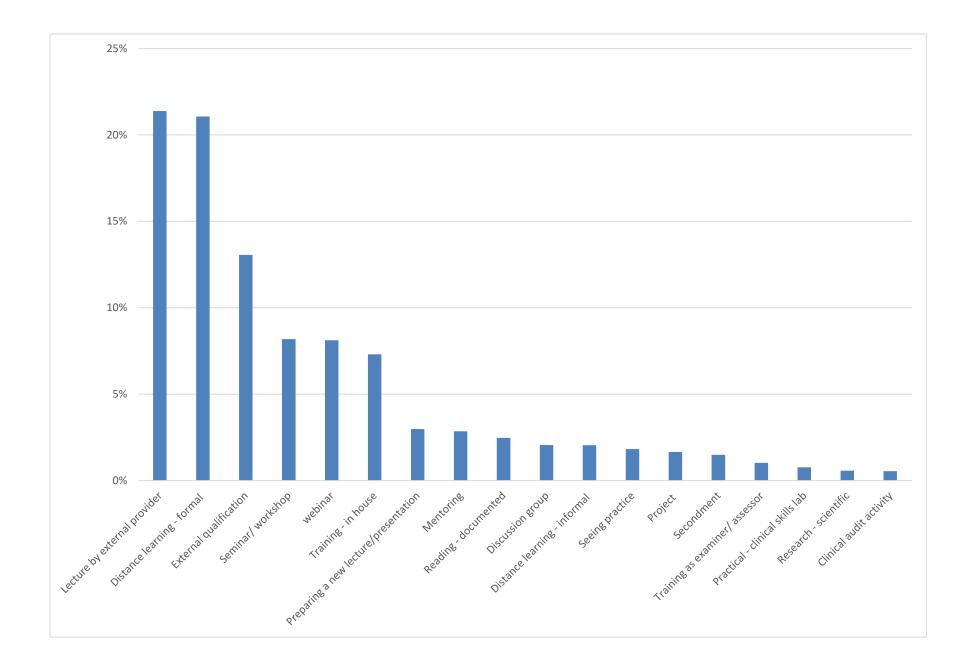
## CPD Breakdown by age

	Total	0-9	10-19	20-29	30-39	40-44	45-54	55-99	100+	NC	С
24-27	54	1	0	1	0	0	13	23	16	2	52
		2%	0%	2%	0%	0%	24%	43%	30%	4%	96%
28-32	217	9	3	17	18	13	52	65	40	60	157
		4%	1%	8%	8%	6%	24%	30%	18%	28%	72%
33-37	256	12	2	12	26	19	61	80	44	71	185
		5%	1%	5%	10%	7%	24%	31%	17%	28%	72%
38-42	206	7	7	9	25	10	48	73	27	58	148
		3%	3%	4%	12%	5%	23%	35%	13%	28%	72%
43-47	162	17	3	4	8	7	47	55	21	39	123
		10%	2%	2%	5%	4%	29%	34%	13%	24%	76%
48-52	39	4	0	0	2	2	10	12	9	8	31
		10%	0%	0%	5%	5%	26%	31%	23%	21%	79%
53-57	51	5	0	1	4	2	13	14	12	12	39
		10%	0%	2%	8%	4%	25%	27%	24%	24%	76%
58-81	45	7	0	0	4	3	12	17	2	14	31
		16%	0%	0%	9%	7%	27%	38%	4%	31%	69%

Number of times being audits - NC RVN					
1 audit	144				
2 audit	87				
3 audit	34				
4 audit	8				
8 audits	1				

Non-respondents number of audits	
1 audit	17
2 audit	23
3 audit	8
4 audit	2
8 audits	1

Lecture by external provider	21%
Distance learning - formal	21%
External qualification	13%
Seminar/ workshop	8%
webinar	8%
Training - in house	7%
Preparing a new lecture/presentation	3%
Mentoring	3%
Reading - documented	2%
Discussion group	2%
Distance learning - informal	2%
Seeing practice	2%
Project	2%
Secondment	1%
Training as examiner/ assessor	1%
Practical - clinical skills lab	1%
Research - scientific	1%
Clinical audit activity	1%





Meeting	Veterinary Nurses Council
Date	.12 February 2020
Title	Update from CPD Referral Group
Classification	Unclassified
Summary	Minutes from the CPD Referral Group's meeting on the 10 January 2020
Decisions required	None: to note
Attachments	None
Author	
	Jenny Soreskog-Turp
	Senior Education Officer
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## CPD Referral Group Notes of the meeting held on 10 January 2020

Present: Linda Ford Chair

Susan Paterson

\* Absent Alison Carr

Jane Davidson Julie Dugmore Michael Hepper

In attendance: Linda Prescott-Clements Director of Education

Jenny Soreskog-Turp Senior Education Officer

Laurence Clegg (Item 5) Senior Practice Standards Officer

#### **Welcome and Apologies**

1. The chair welcomed everyone to the meeting. Apologies were noted from Alison Carr, Jane Davidson, Julie Dugmore and Michael Hepper.

#### **Declarations of interest**

2. There were no new declarations of interest

#### **Minutes**

3. The minutes of the meeting held on 2 October 2019 were received and approved as a true and accurate record.

#### **Matters arising**

4. The CPD pages on the RCVS website have been updated and include some of the old blogs and new information in different formats such as videos. The Group thought it would be useful to get number of visitors to the CPD section of the website.

Action: Education Department to collect stats from the CPD pages and present at the next meeting.

- 5. At the last Education Committee meeting there was a question about whether veterinary surgeons who report their CPD to other professional organisations/regulators need to record their CPD using 1CPD or if their current records can be shared with RCVS. 1CPD is mandatory from 2022 and in the next year the Education Department will review options for users to import and export data through the new portal. All members and records need to comply with the outcome based requirement and not only count hours.
- 6. Following the discussions at the last meeting regarding the non-practising register, the Director of Education discussed the issue with the registrar. The legislative working party have discussed options for dealing with practising/non practising register and are considering different possibilities including licence renewal.

#### Query from PSS re non-compliance

- 7. According to core PSS standards all veterinary surgeons and nurses in the practice need to be CPD compliant; and with the introduction of new annual CPD requirement PSS assessors were unsure of how to enforce it. In the past when someone has been non-compliant assessors have asked for a plan of how they will make up the hours to meet the three year requirement. The group felt that they needed some further information about the scheme in order to provide guidance, therefore Laurence Clegg, Senior Practice Standards Officer, joined the meeting.
- 8. Within the current procedures practices do not review CPD records themselves, but send links to each individual's PDR records for assessors to check compliance. Therefore the practice might not be aware that a staff member is non-compliant. The group discussed what level of responsibility the practice have in checking compliance for staff members and how records could be shared in compliance with GDPR regulations. Within 1CPD, users will be able to download a certificate of compliance and it was suggested that staff members could present the certificate to the practice manger as evidence of compliance. Practices should check that all staff have met the requirement for each calendar year and if anyone is non-compliant it could jeopardise the accreditation.
- 9. The new requirement of 35/15 hours per year was introduced in January 2020, so therefore this year would be transition period and assessors can continue with the current procedures of checking records and ask for a plan to meet the hour requirement by the end of the year.
- 10. The group felt that with the change of requirement it was important that it was properly enforced and that it would be undermine the process if practices could be accredited even though some of the veterinary surgeons and nurses working there were non-compliant. Starting from 2021 the group recommends that if any veterinary surgeon or nurse is non-compliant with the requirement in 2020 they should not pass the assessment. The cases should then be referred to the referral group to advice assessors about the next step which would depend on the number of hours recorded, the plan for the following year and if the staff member was engaging in the referral group process.
- 11. The group felt that it would be necessary to review the process for dealing with non-compliance in order to make sure that the new requirement could be enforced and in a timely manner. The

problem with the previous requirement was that PIC would only consider cases of non-engagement rather than CPD non-compliance. The group felt that there needed to be a discussion with the registrar about sanctions available and what PIC need in order to refer CPD non-compliance to DC. The group suggested that it would be useful to invite the registrar to the next meeting in order to agree the procedures.

Action: JST to invite the Registrar to the next meeting.

12. As the group will review the process for dealing with non-compliance it would also be a good opportunity to review the correspondence and timeline for letters that we send non-compliant members. It needs to be clear within our correspondence what the role of the Referral group is and the group felt that the name "CPD Referral Group" might cause confusion. It was suggested that as part of the review at the next meeting, the group should also discuss the name of the Referral group to make sure that the name reflects its purpose and that it is clear to members of professions.

Action: CPD audit and Referral Group correspondence and timings to be discussed next meeting

Action: Discuss name of the group at the next meeting.

#### **CPD Timeline and flowchart**

13. The Group reviewed the flowchart and thought it provided clear information and would be helpful tool for anyone struggling with CPD or deciding whether to stay on the register. The CPD timeline for 2020 to 2022 provided the group with information about any important upcoming dates and deadlines.

#### Follow up of non-compliant VS/VNs

- 14. The group received a paper providing information about monitored cases.
- 15. The cases were last reviewed in May 2019 and there were 10 cases of non-compliance for the group to monitor. The outcome of the 10 cases are:
  - 3 have submitted their records and are now compliant with the CPD requirement
  - 3 have been in contact but are non-compliant
  - 3 have not been in contact and have been sent a letter by recorded delivery asking for records by the 24 January 2020.
  - 1 has removed their name from the register.
- 16. The group agreed to monitor the non-compliant cases and ask for updates by next meeting in May. They decided that if the three cases that had were sent a final letter did not respond by the 24<sup>th</sup> January then they should be referred to the Professional Conduct Department.
- 17. One veterinary nurse has been included in two audits but has not done any CPD and is not planning to do any so she has asked for the group to review her case. She is running a cat sanctuary and do not feel the need for CPD but wanted to stay on the register. The group wondered if she was doing CPD that she was not aware of or not keeping a record of and Sue Paterson volunteered to speak to her to discuss her options.

Action: JST to get permission from the RVN to pass her contact details on to SP.

#### New Referrals of non-compliant VS/VNs

- 18. Following last year's CPD audit the Education Committee and VN Council decided to refer any vets or nurses that had been included in at least three audits but were still non-compliant.
- 19. 69 veterinary surgeons and 9 veterinary nurses were contacted by phone to discuss their CPD records and plan. Then they were then asked to send records, and the outcomes of the cases are:
  - 47 vets and 5 RVNs are now compliant with the CPD requirement.
  - 4 vets have removed their name from register or changed to NP.
  - 7 vets and 3 RVNs are still NC but have provided development plans.
  - 5 vets are planning to retire, change to NP or not renewing membership.
  - 3 vets and 1 RVN are NC but are yet to provide a development plan.
  - 2 vets are NC and have been in contact but have not yet provided any records/plans.
  - 1 vet has still not responded to any communication or provided any records/plan.
- 20. The group reviewed the cases and agreed with the recommendations in the paper; to keep monitoring the non-compliant cases, chase any CPD development plans and review their records again at the next meeting. The 2 vets that have been in contact but not yet sent records have been sent a letter from registrar asking for records by 24 January 2020 and if no response has been received they should be referred to Professional Conduct Department. The vet that has not been in contact should be referred to Prof Con.

#### Any other business

21. There were no other business.

#### Date of next meeting

The date of the next meeting is on the 15 May 2020 at 12.30, but the meeting might need be longer to accommodate new policy discussions.

Jenny Soreskog-Turp January 2020 j.soreskog-turp@rcvs.org.uk



Meeting	Veterinary Nurses Council
Date	.12 February 2020
Title	.Update from the CPD Working Party
Classification	Unclassified
Summary	Minutes of the CPD working party 30 January 2020
Decisions required	.To note
Attachments	None
Author	Jenny Soreskog-Turp
	j.soreskog-turp@rcvs.org.uk



## CPD Policy Working Party Minutes of the meeting on the 30 January 2020

Present: Stephen May Chair

Frances Barr Teleconference
Susan Rhind Teleconference

\* Absent Jane Davidson

Shona McIntyre

In attendance: Linda Prescott-Clements Director of Education

Jenny Soreskog-Turp Senior Education Officer

Julie Dugmore Director of Veterinary Nursing

Rebecca Smith Education administrative assistant

Felix Michaux Lead Software Developer Richard Burley Chief Technology Officer

Joanne Stetzel Marketing Communications Manager

#### **Welcome and Apologies**

1. The Chair welcomed everyone to the meeting and noted that Jane Davidson and Shona McIntyre had sent their apologies.

#### **Declarations of interest**

2. There were no new declarations of interests.

#### **Matters arising**

3. There were no matters arising that were not covered by agenda items.

#### Minutes of the meeting on the 10 September 2019

4. The notes of the meeting held on the 10 September 2019 were received and approved.

#### **Update on the Communication Plan**

5. Ms Stetzel updated the working party about the progress of the communication plan designed to educate, inform and encourage early adoption of the outcome based model.

- 6. The 9-week CPD communications campaign started at the end of December 2019 and has included emails, videos and social media posts covering a range of CPD related issues. The content has focused on a singular issue rather than trying to cover all information at once, which seems to have worked very well. Overall, the engagement with the posts has been very good.
- 7. Over the next few weeks further videos will be published covering reflection and depending on response and comments from members the communication plan will be reviewed and updated.
- 8. In the last week, many users have contacted RCVS regarding login problems and the group discussed what we can do to help members. It was suggested that we should try to raise awareness of login credentials on social media, the RCVS newsletter and signpost users to FAQ on the website.

#### Action: Ms Stetzel to review and signpost where possible

- 9. The Working Party felt that the RCVS website contains a lot of really good and useful information but that the website needs to reviewed and updated to make sure that members can easily find the information they are looking for.
- 10. After the launch of 1CPD and the initial phase of the communication plan, it is important that we do not lose momentum and keep raising awareness about the benefits and ease of using the outcome based CPD model. There are different ways to reach members for example by social media posts or app notifications but also face to face meetings to speak to people about the new model and demonstrate 1CPD.

Action: explore options including regional roadshows

#### Feedback from the trial

- 11. The working party reviewed the feedback from the CPD trial.
- 12. The group was pleased with the positive and constructive feedback received and thought it would be interesting to compare the trial feedback to feedback we will receive from members who have started using the platform after the official launch.
- 13. Some users felt the historic data should be more visible on the system, especially the last three year period so that members feel reassured that they have done enough hours to confirm CPD compliance as part of the annual renewal.

Action: IT to explore adding this to 1CPD

14. There were comments about the amended list of activities on 1CPD and the Education Department have developed a table to describe and provide examples for each of the categories, which will be part of help/guidance in 1CPD.

Action: Education dept to finalise the list and share with 1CPD development team

- 15. It is important to continue to evaluate and review data about how members are using 1CPD to see if members are making full use of all the features, if any trends are identified we can publicise helpful tips.
- 16. The app needs to be accessible to everyone in the profession and the IT development team are looking at introducing and promoting different features to help the wide range of users.
- 17. Feedback from users will be reviewed on a regular basis to improve the user experience and it is important that we make members aware of any changes we make due to user feedback and promote any new helpful features.

#### **Policy Discussions**

- 18. The working party received the paper about clarification to the CPD Policy.
- 19. There have been several discussions about the level of access that the RCVS should have to reflective notes and usage of 1CPD has been included as part of the privacy policy.
- 20. It was suggested that the Legislation Working Party should discuss making reflective notes a legal privilege so that the court could not ask for personal reflections as part of an ongoing case. Some users might want to share their reflections with colleagues so it was suggested that users should have the option to make reflections (or part of them) private, at the same time as authorising access to a separate section.
- 21. The group felt that part of the privacy policy that was relevant to 1CPD should be easily accessible within the system to reassure users.
- 22. An amendment was suggested to include veterinary nurses as well as veterinary surgeons in the last paragraph.

#### **Action: Education Department to update Privacy policy**

- 23. Within the current 1CPD system members can only reflect by answering three mandatory questions and the group discussed if different formats of reflections should be allowed.
- 24. It was agreed that it is important to encourage reflections and that not everyone will reflect in the same way so therefore it was agreed that we should explore how the system can allow for different formats of reflections such as attached documents, audio files or photos. There were discussions about how the requirement can enforced with a more flexible approach and the group agreed that any issues could be resolved by the reviewing records in the cpd audits.

## Action: The IT Development Team and VN/Education Department to review options to allowing different format of reflections.

25. During the CPD pilot it was agreed that reflections could be counted as part of CPD as long as the reflections were properly documented. The group discussed if and how reflection can be counted towards the general CPD requirement.

- 26. The working group felt that reflection by answering the three standard questions shouldn't take much additional time and could sometimes be complete as part of the learning activity. It was suggested that any users that felt that they had done more in-depth reflection could flag up time added for reflection so that it would be followed up and approved.
- 27. In cases when members had dedicated time to do critical reflection and they had included clear evidence of in depth reflection, the group felt that should be included as CPD.
- 28. It was suggested that one way to facilitate this would be for users to record bigger pieces of reflection as a "reflective event" in which their reflection on a specific topic might be linked to reflection for several CPD activities.
- 29. The working party felt that introducing a time limit or standard additional time for general reflection needed careful consideration and that we need to review the data from 1CPD in order to make any general recommendations.
- 30. The group agreed that 1CPD could be a great opportunity for RCVS to share excellence and present the findings on a global stage. In order for this to have impact, and conclusions to be evidence-based, it is essential to have a clear understanding of what data we need and how we are going to use it. It was agreed that the Education and VN Departments should draft a research and data strategy to consider how we can make best use of the data in order to provide value to members and then to evaluate if any changes need to be made in 1CPD to support the strategy.

## Action Education and VN Department to develop and research and data strategy

31. Some members of the trial had asked if RCVS could provide feedback on personal reflections in order to reassure them that they were doing it correctly. Next week we will start to promote reflection videos on social media and the working party felt that rather than reviewing individual records we would provide more general information with examples of how to reflect. The communication department will evaluate the data from the reflection posts to review if there were any areas that needed further explanation. It would be useful if we could publicise videos to explain the reflection process so that this can be recognised as underpinning the recorded outcome of reflections.

#### Any other business

- 32. Mr Michaux provided the group with usage data from 1CPD. The launch has been very successful with the PDR data successfully migrated to 1CPD. In the first week over 6000 have accessed 1CPD either by downloading the app or using the website.
- 33. The IT development team will continue to review and evaluate feedback together with the Education Department to make further improvements to the system.

#### **Next meeting**

34. There is no set date for the next meeting but it is planned for April/May.

Action: JST to send out dates for next meeting.

Jenny Soreskog-Turp January 2020 j.soreskog-turp@rcvs.org.uk



Meeting	Veterinary Nurses Council
Date	12 February 2020
Title	RVN Preliminary Investigation Committee Chair's Report to Council
Classification	Unclassified
Summary	This report sets out the work of the Registered Veterinary Nurse (RVN) Preliminary Investigation Committee (PIC).
Decisions required	None
Attachments	None
Authors	Sandra Neary Professional Conduct Officer 020 7202 0730 s.neary@rcvs.org.uk  Gemma Crossley Head of Professional Conduct 020 7202 0740 g.crossley@rcvs.org.uk

## Registered Veterinary Nurses Preliminary Investigation Committee

#### Chair's Report to VN Council

#### Introduction

 Since the last Report to Veterinary Nurses Council there have been two meetings of the RVN Preliminary Investigation Committee which took place on 26 November 2019 and 14 January 2020. The next scheduled meeting is on 25 February 2020.

#### **RVN Concerns received / registered**

- 2. Between 31 October 2019 and 29 January 2020, there were seven new Concerns received against RVNs. Of these seven new Concerns:
  - All are currently under investigation by the Case Examiner Group (a veterinary nurse and lay member on RVN PIC and a Case Manager);

#### **RVN Preliminary Investigation Committee**

3. There has been one new concern considered by the RVN PIC between 31 October 2019 and 29 January 2020. The RVN PIC decided that there was no realistic prospect of a finding of serious professional misconduct. In closing the concern, the RVN PIC decided it was appropriate to issue advice to the RVN.

#### **Ongoing Investigations**

4. Two concerns are currently under investigation and will be returned to the RVN PIC for a decision in due course.

#### **Health Concerns**

One RVN is currently being managed in the context of the RCVS Health Protocol. At its meeting on 26 November 2019, an RVN was discharged from the Health Protocol following a period of successful compliance with the Undertakings.

#### **Performance Concerns**

6. There are currently no RVNs being managed in the context of the RCVS Performance Protocol.

#### **Referral to Disciplinary Committee**

7. Since the last report to VN Council, the RVN PIC has referred one case to the RVN Disciplinary Committee. The case relates to an RVN's Police caution in respect of three offences including the unlawful possession of POM-V medicines.

#### **Training**

8. The RVN PIC, PIC, Veterinary Investigators and members of the Professional Conduct team attended a day of training on 7 November 2019. Among the topics covered were "public interest" and how it affects the PIC's consideration of cases and relevant recent case law.



Meeting	Veterinary Nurses Council				
Date	6 February 2020				
Title	.VN Register Report				
Classification	Unclassified				
Summary	This paper provides the following statistics:  a. The number of registered veterinary nurses as at 4 February 2020, showing removals in early January for non-payment of the annual fee. Figures for the previous five years are also included.  b. New registrations for the calendar years 2014- 2019. The figures for 2016 - 2019 also show the qualification route of the new registrants.  c. New student enrolments per academic year				
Decisions required	None				
Attachments	None				
Author	Annette Amato Deputy Head of Veterinary Nursing .020 7202 0713 a.amato@rcvs.org.uk				

## **Veterinary Nurses Register**

### a. Number of registered VNs

	22/01/2015	20/01/2016	18/01/2017	18/01/2018	24/01/2019	04/02/2020
Number of Registered Veterinary Nurses	11381	13164	14337	15449	16864	18246
Number of Listed Veterinary Nurses	959	n/a	n/a	n/a	n/a	n/a
Number of Nurses removed for non- payment of annual fee (annually – carried out in early January)	302 RVN 60 VN	688 (173 restored to register by 20/01/2016)	247 (17 restored to register by 18/01/2017)	296 (59 restored to register by 18/01/2018)	450 (124 restored to register by 24/01/2019)	409 (84 restored to register by 04/02/2020)

### b. **Number of admissions to the register** (new registrants for the calendar year)

	2014	2015	2016	2017	2018	2019
UK Further Education qualification			719	945	1197	1081
UK Higher Education qualification			400	401	406	503
Overseas qualification			90	89	78	62
Total new registrations	1054	1140	1209	1435	1681	1646

## c. Student enrolments for each academic year (from 1 July to 30 June)

Student Enrolments	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019
(academic year)						
	1488	1630	1797	1935	1990	2109