

Practice Review: Policy on Extenuating Circumstances

Version 1.0

Extenuating Circumstances Policy

The PSI Continuing Professional Development Rules 2015 (S.I. No. 553 of 2015) which came into effect on 1 January 2016, state that registered pharmacists have an obligation to undertake regular continuing professional development (CPD) in order to maintain their competence. The Rules mandate that pharmacists must record and maintain a record of CPD activities, using an ePortfolio system, as specified by the PSI. Each registered pharmacist is obliged to submit a report of his or her CPD activities for review once in every 5 years. The Rules further mandate that a random selection of pharmacists in a patient-facing role shall also be required to participate in the Practice Review.

Pharmacists selected for Practice Review will be required to attend a Practice Review event held by the Irish Institute of Pharmacy (IIP). The Practice Review selection process will be overseen by the PSI, with a number of registered pharmacists being selected at random from the register each year. The PSI will notify the pharmacists who have been selected by email, advising them of the date of the Practice Review event and the next steps in the process.

On occasion, circumstances may arise where a selected pharmacist is not in a position to participate in the Practice Review event. This document clarifies how a pharmacist can make an application for exemption from the Practice Review event and how the PSI will consider such applications.

An extenuating circumstance is regarded as a circumstance beyond the control of the individual, which has had and/or will have an impact on the pharmacist's ability to present for Practice Review.

Examples of Extenuating Circumstances

Extenuating circumstances are exceptional situations and applications will be dealt with on a case-by-case basis. It is not possible to provide an exhaustive list of scenarios that would fall into this category, however, for information purposes, the following is a list of generally accepted circumstances and examples of evidence required to support such applications:

Generally accepted circumstances	Supporting documentation to be submitted with application
Serious illness preventing a pharmacist from being able to work and present for practice review.	An original medical certificate or letter from an appropriate medical professional confirming the nature of the illness that prevents the pharmacist from working.
Acute personal/emotional circumstances, for example, due to a bereavement, which prevent a pharmacist from presenting for practice review.	An original medical certificate or letter from an appropriate medical professional confirming the nature of the circumstances
Serious illness of a family member (e.g. spouse, parent, child)	A medical cert/letter from an appropriate medical professional confirming the nature of the circumstances
Criminal investigation or proceedings, litigation, jury duty, other legal matters, excluding professional disciplinary matters	A solicitor's letter
On maternity leave at time of event	Letter from appropriate medical professional and employer with details of when leave commenced.
A short-term debilitating illness that occurs around the time of the practice review event	A medical cert/letter from an appropriate medical professional confirming the nature of the circumstances
Unexpected personal disruption or event that happens at the time of the practice review event	Explanation of event and any documentation that will support the application illustrating timelines and impact.

Travelling or living abroad at time of practice review event	Proof of address abroad and letter from employer stating that the pharmacist is an employee (providing timelines of employment) Copy of travel documents that provides evidence you will be out of the country at the time of the event.
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This is not an exhaustive list but is provided for illustrative purposes to assist decision making.

NB: It is noted that an unforeseen event could happen around the time of the practice review event that prevents the pharmacist from attending the event. In such instances, the pharmacist should email the PSI, if possible, on the day of the unforeseen event detailing why they cannot attend. The PSI will follow up with the pharmacist in this regard and may request supporting documentation to provide proof of absence. This would include circumstances arising on the morning of the event, and participants are expected to notify PSI as soon as practicable.

Examples of generally unaccepted circumstances are set out below.

Generally unaccepted circumstances
Excessive demands on time or pressure of one's employment
Financial problems
Unemployment
Career break
Retirement (Retired pharmacists who wish to remain on the Register are obliged to engage in CPD).

Process

On receipt of notification that a pharmacist has been selected for Practice Review, if he/she feels they are unable to attend the Practice Review event due to extenuating circumstances, he/she should complete the Extenuating Circumstances Form and attach all supporting documentation for submission to the PSI by the deadline outlined on the notification email.

- The PSI will acknowledge receipt of the application in writing within 5 working days from the date the application is received at the PSI offices.
- The application will be considered by the Registrar of the PSI (or appropriate person, as nominated by the Registrar) and the outcome will be issued to the applicant formally in writing within 28 days of receipt of the application.

If the pharmacist is unable to complete the application form due to being incapacitated, a next of kin may contact the PSI and request to complete and submit the application on their behalf.

Outcomes

There are two possible outcomes following an application for exemption from a Practice Review event, due to extenuating circumstances:

- The application is approved and the pharmacist is exempt from their assigned Practice Review event and is scheduled to attend the next available Practice Review event. The pharmacist is expected to attend this rescheduled event, however, if for very exceptional reasons, a pharmacist cannot attend the next scheduled Practice Review event, they must submit another application form for extenuating circumstances.

- The application is not approved and the pharmacist must attend the Practice Review event they were originally assigned to.

It is important to note that applicants should not assume that an application has been granted until they receive written confirmation from the PSI.

Supporting Documentation

- It is the responsibility of the applicant to provide relevant supporting documentation. Applications made to the PSI without independent supporting documentation will not be considered.
- The PSI reserves the right to independently verify any supporting documentation if deemed necessary. If any supporting documentation cannot be independently verified, the PSI reserves the right to reject an application.
- Supporting documentation provided by a third party must be provided by a relevant, qualified, independent professional, who must not be a relative of the applicant.
- Original supporting documentation and/or copies of original documents will be accepted.
- Any supporting documentation submitted that is not in the English/Irish language must also be accompanied by a certified translation. The translation must be carried out by a registered and authorised translator. On the page of the translation, the translator must state name of translator and business address, certify that they are authorised to translate from the language into English [or Irish] language(s) and certify that the translation is true and accurate.
- Documentation submitted in support of an application must be unaltered. Altered or amended documentation will not be accepted.
- If evidence of fraudulent documentation is found during assessment of an application, the matter will be referred to the Registrar of the PSI.
- All applications and supporting documents will be treated confidentially and in accordance with the PSI's Data Protection policies.

Assessment of Extenuating Circumstances Applications

Applications for extenuating circumstances will be considered on a case-by-case basis by the Registrar of the PSI, or by an appropriate person, as nominated by the Registrar.

When assessing applications for extenuating circumstances, the following considerations shall be included in the assessment process:

- Has the application been submitted by the deadline and in the appropriate form with all relevant supporting documentation?
- Has the pharmacist previously submitted an application for extenuating circumstances?
- Has the pharmacist provided evidence of satisfactory certification for ePortfolio Review in the past?

Document Control		
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