

# Practice Review: Policy on Extenuating Circumstances

## 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 require pharmacists to 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 also require a random selection of pharmacists, in patient-facing roles, to participate in 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 will have an impact on the pharmacist's ability to present for Practice Review.**

### Examples of Extenuating Circumstances

Because of their exceptional nature it is not possible to provide an exhaustive list of scenarios that would fall into the category of extenuating circumstances. Applications will be dealt with on a case-by-case basis and on their own merits. However, for the purposes of illustration, the following is a list of circumstances where a granting of extenuating circumstances could apply, and examples of evidence required to support such an application.

<b>Circumstances</b>	<b>Supporting documentation to be submitted with application</b>
Serious illness.	An original medical certificate or letter from an appropriate medical professional.
Acute personal/emotional circumstances.	Explanation of event and any documentation that will support the application.

Serious illness of a close family member (e.g. spouse, parent, child) that directly impacts on the pharmacist	A medical cert/letter from an appropriate medical professional or any documentation that will support the application.
Involved in court proceedings at time of event and/or on jury duty at time of event.	A solicitor's letter/letter of evidence you are on jury duty.
On maternity leave at time of event	Letter from appropriate medical professional and/or 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 and/or employer confirming the circumstances.
Unexpected personal disruption or event that happens around the time of the practice review event	Explanation of event and any documentation that supports the application.
Travelling abroad or living abroad (either permanently or temporarily) at time of practice review event	Proof of address abroad and/or 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 and that the event was booked prior to receiving communication about selection.

**In circumstances where an unforeseen event happens which prevents the pharmacist from attending for practice review, the pharmacist should email the PSI, if possible, on the day of the unforeseen event. The email should explain the circumstance and detail why they cannot attend for Practice Review. The PSI will follow up with the pharmacist and may request relevant supporting documentation. This includes circumstances arising on the morning of the event, and pharmacists are expected to notify PSI as soon as practicable.**

Examples of circumstances which are generally not considered extenuating circumstances are set out below.

<b>Generally unaccepted circumstances</b>
Excessive demands on time or pressure of one's employment
Financial problems
Unemployment

## 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 submit all supporting

documentation for submission to the PSI by the deadline outlined on the notification email. **The pharmacist must submit a full and complete application providing a detailed explanation on the form as to why they are seeking an exemption.**

- The PSI will acknowledge receipt of the application in writing within 7 working days from the date the application is submitted. The PSI will also outline the timelines for when a pharmacist can expect to receive an outcome on their extenuating circumstances application.
- The application will be considered by the PSI and the outcome will be issued to the applicant formally in writing.

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.

### Appeals Process

If a registrant wishes to appeal a decision, where an extenuating circumstances application has not been approved, they must submit a supporting statement in writing within 14 days of receiving notification that their application has not been approved, setting out the grounds for their appeal. This statement, together with the extenuating circumstances application will then be considered by the Registrar.

There are two possible outcomes following an appeal request:

- The application is approved by the Registrar of the PSI, 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.

### 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 may, from time to time, seek additional supporting documentation from an applicant in support of an application.
- 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.
- The data and information provided as part of the application is treated in the strictest confidence in accordance with the PSI's Data Protection policies.
- All applications are retained in accordance with the PSI's [retention policy](#).

### Assessment of Extenuating Circumstances Applications

Applications for extenuating circumstances will be considered on a case-by-case basis.

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?