

## GUIDANCE SHEET

# E-PORTFOLIOS AND REVALIDATION

### Keeping a portfolio

For revalidation we recommend that nurses, midwives and nursing associates keep evidence that they have met the revalidation requirements in a portfolio. If they already keep a professional portfolio, revalidation evidence can form part of that portfolio. We do not require them to maintain a separate portfolio for revalidation, or use an e-portfolio. They also do not need to upload evidence from their portfolio to the NMC website as part of their revalidation application, or if they are selected to provide further information to verify their evidence.

The section on non-identifiable information in [How to revalidate with the NMC](#) provides detailed advice about how to ensure that all the information held in the portfolio for the purposes of revalidation does not record any information that might identify an individual, whether that individual is alive or deceased. This means that all information must be recorded in a way that no patient, service user, colleague or other individual can be identified.

### NMC forms and templates

We have developed a range of **forms and templates** to provide a straightforward way for nurses, midwives and nursing associates to record the evidence they need for revalidation. The practice hours log template, CPD log template and feedback log template are optional, but the reflective accounts form, the reflective discussion form and the confirmation form are mandatory.

These forms and templates can be downloaded directly from our website. They may be incorporated into an e-portfolio system by means of a link to our website, but the reflective accounts form, the reflective discussion form and the confirmation form should not be adapted from the format in which we have provided them. This is because we will continue to update the guidance and make revisions to the forms and templates as necessary, so it is important that nurses, midwives and nursing associates access the most up to date versions through our website directly when they are due to revalidate.

The reflective discussion partner and confirmer need to sign the reflective discussion and confirmation forms respectively. While the reflective discussion and confirmation discussion should be face-to-face where possible, if necessary we will accept electronic signatures on these forms.

## Data protection implications for nurses, midwives and nursing associates

When the reflective discussion and confirmation forms are completed, they will contain identifiable information about another NMC-registered nurse, midwife, nursing associate or a confirmer, including their name and address. You may choose to store your completed reflective discussion and confirmation forms in either paper or electronic format. However, you should still respect the fact that these forms contain personal data about your reflective discussion partner and confirmer.

As part of our work on revalidation we have sought advice on data protection and asked the **Information Commissioner's Office** (ICO) to consider whether the revalidation model would require our registrants to register with them as data controllers when processing electronic records, and if they need to pay a fee.

There is not an exemption under Data Protection legislation which applies to personal data processed by our registrants, as part of the reflection and discussion elements of revalidation.

However, the ICO recognised that it would be highly disproportionate to expect our registrants to have to register with them as data controllers when processing electronic records, or to pay a fee. The ICO has confirmed that it does not plan to take any action against any of our registrants for failing to register with them.

## Data protection implications of using e-portfolio systems

We know that some membership organisations, for example professional bodies and unions, as well as other commercial organisations, are offering e-portfolio systems for individual nurses, midwives and nursing associates to use to keep their revalidation evidence.

Any organisation that decides to provide such an e-portfolio service to individual nurses, midwives and nursing associates needs to be aware that there are data protection implications. Nurses, midwives and nursing associates may choose to store their completed reflective discussion and confirmation forms in electronic format using an e-portfolio system. However, they must ensure that the personal data on those forms is processed in accordance with the **data protection principles** set out in the GDPR.

## Data protection implications for employers or agencies who are registered with the ICO

We understand that employers or agencies might consider supporting their nurses, midwives and nursing associates by providing an e-portfolio system for them to keep their revalidation evidence. If they are providing such a system for the use of the nurses, midwives and nursing associates they employ or engage in order to facilitate their individual revalidation applications then the same considerations apply as are set out above, as the individual nurses, midwives and nursing associates will still be creating, recording and holding the personal data in the two forms for the purposes of their own professional revalidation.

We appreciate though that some employers may wish to store revalidation records for their staff electronically for their own separate employment purposes, for example if the reflective

discussion or confirmation discussion is with a line manager and forms part of an annual appraisal process. Any such decision would come under the responsibilities of the employer as a data controller and whether or not they need to keep the revalidation records is for them to decide in line with their own obligations under data protection legislation and their own data retention schedules.

We are not able to provide any specific advice about this as it is separate from the processing of the data by the individual nurse, midwife or nursing associate for professional regulatory purposes. The advice that we have provided to our registrants in relation to storing the reflective discussion and confirmation forms in either electronic or paper form is for them as individuals.

It is up to organisations to consider their own obligations under data protection legislation and they should consider seeking advice that is specific to them from the **Information Commissioner's Office** in relation to this.

## **Further information**

Further information can be found on the **ICO website**.

**Please note: that the NMC does not collaborate on, or endorse, any e-portfolio systems and we are unable to review or approve any revalidation documents and resources that are developed as part of such systems.**

**All the information, guidance and forms needed by individual nurses, midwives and nursing associates in order to revalidate are available free of charge on the **NMC website**.**