Public business

GPhC policy on return to registration

Purpose
To agree an update to the GPhC registration criteria, setting out our policy on those returning to the register.

Recommendations

The Council is asked to agree:

i. The proposed updated policy for those returning to registration

ii. Minor, consequential amendments to registration criteria documents for pharmacists and pharmacy technicians

1.0 Introduction

1.1 The current registration policy includes two routes for those seeking to return to registration for previous members/registrants of the RPSGB:

1.2 Route 1: The route for members/registrants of the RPSGB who had been registered as practising for a period of time between 1 January 2005 and the 26 September 2010. Applicants using this route have been required to undertake some CPD while registered as practising between 1 January 2005 and 26 September 2012, because CPD became compulsory on 1 January 2005 for practising members of the RPSGB. This means that there is some documented evidence that such applicants had maintained the currency of their practice in the 5-7 years before their application to reregister. For this reason, nothing further has been required in order for them to reregister.

1.3 Route 2: The route for members/registrants of the RPSGB who had been
registered before 1 January 2005 (and who have not been registered as practising at all between 1 January 2005 and the 26 September 2010). Applicants using this route have not been required to submit CPD while registered, so they have been required to map their current level of competence against the GPhC’s *Standards of conduct, ethics and performance* – the core standard for all registrants. The GPhC has received and reviewed a small number of mapping portfolios (see Appendix 1). Additional professional requirements could have been imposed either before or after re-registration but in all cases applicants were able to provide a self-assessment of current competence, meaningful personal development plans and evidence of either:

i) working in pharmacy outside GB with evidence of appropriate professional development and performance appraisals from employers or;

ii) evidence of appropriate professional development and continuing education whilst away from pharmacy practice

On the above basis, all applicants who submitted portfolios have been re-registered.

1.4 The current policy was agreed for a period of two years only. That period expires on 26 September 2012.

1.5 *Surveying those who have re-registered with the GPhC*

To assess the likely impact of the policy proposals, we carried out a small survey of those people who re-registered since 26 September 2010. The results are set out in Appendix 1. The main findings are that most pharmacists continued to work in pharmacy outside GB when not registered here and most pharmacy technicians left the register while registration was not compulsory to save money but continued to work. Although some anecdote suggested that a large proportion of those leaving and returning to the register were likely to be women on maternity leave, the feedback from the survey does not bear this out. As most people who applied to re-register continued to work in a pharmacy while not registered (either as pharmacists outside GB or as pharmacy technicians in GB), any concerns are not linked to the currency of their work experience.

2.0 *Comments on the mapping process*

The route 2 applicants for re-registration who presented a mapping portfolio and responded to the survey were asked to comment on the process. The most encouraging feedback was that they felt the process was reflective and had helped them identify personal development needs. Respondents were less clear about how their portfolio would be assessed once it had been submitted, which
will be clarified in the future.

2.1 **Updated policy for those wishing to re-register**

2.2 It is no longer appropriate to rely on transitional arrangements, especially as route 1 is an essentially passive route based on ever more dated assumptions about an applicant’s fitness to practise - cannot be justified on patient safety grounds. Route 2 - which is an active consideration of an application - is a robust way of evaluating the strength of an application based on the analysis and verification of evidence. The core proposal is to extend the current Route 2 policy to all applications applying to re-register when the transitional policy expires on the 26 September 2012.

2.3 **Evaluating portfolios in the future**

During the transitional period, portfolios were evaluated by GPhC staff. To evaluate portfolios in the future we intend to train external evaluators to do the work. Each portfolio will be evaluated by two experts who will make a registration recommendation to the Registrar. Using two experts to evaluate each application reflects our approach to evaluating other applications or declarations requiring a significant degree of judgement. Examples where this approach is followed include pre-registration trainee fitness to practise declarations and Registration Assessment fourth attempt requests. It is our experience that using two evaluators results in more consistent decision making.

2.4 **Appeals**

Appeals against decisions on applications to re-register would be made to the GPhC’s Appeals Committee.

2.5 In summary, the route will be:

1. applying to re-register including the submission of a portfolio of evidence;
2. evaluation of the portfolio;
3. making a recommendation to the Registrar on whether the application to re-register is approved. In a small number of cases additional professional development may be required, which will be monitored and evaluated by the GPhC;
4. an appeal to the Appeals Committee if an applicant is not satisfied with a decision on his or her application to re-register.

The process will be evaluated after it has been in operation for a year.

Note that return to registration applications can be made after one year of
leaving the register: applications made less than one year after leaving the register are treated as restorations.

3.0 **Amending registration documents**

If the proposal is accepted, two registration documents will have to be amended: *Criteria for initial registration as a pharmacist* and *Criteria for initial registration as a pharmacy technician*. Now that registrants are renewing their registration with the GPhC, the use of 'initial' is redundant and references to transitional provisions need to be removed and replaced with references to the new requirements. No other amendments are needed. Both documents are presented, with and without track changes, as appendices 2 and 3.

3.1 **Equality and diversity implications**

4.0 Our survey shows that people were not disadvantaged by leaving the register – financially or otherwise – and there is no evidence that the re-registration proposal will deter or disadvantage a particular group either. We will monitor this.

4.1 **Communications implications**

5.0 We will communicate this change to registrants via Regulate and to non-registrants via our website. As an additional measure, when registrants leave the register we will write to them explaining the process should they, after a year, consider returning to the register.

5.1 **Resource implications**

6.0 Other than charging the standard registration fee, we do not intend – at this stage - to charge for evaluating portfolios of those applying to return to the register. Over time we will build up evidence of the numbers of applications to re-register and will bring the issue back to Council if it is felt an additional charge is required to cover the cost, consistent with our fees policy.

6.1 **Risk implications**

**Recommendations**

The Council is asked to agree to:
i. minor, consequential amendments to registration criteria documents for pharmacists and pharmacy technicians
ii. agree the proposed updated policy for those returning to registration

Hugh Simpson, Director of Policy and Communications
General Pharmaceutical Council
hugh.simpson@pharmacyregulation.org, tel 020 3365 3516

29 August 2012

Appendices
1. Survey of registrants who have reregistered since the establishment of the GPhC
2. Criteria for registration as a pharmacist and criteria for registration as a pharmacy technician (with tracked changes)
3. Criteria for registration as a pharmacist and criteria for registration as a pharmacy technician (without tracked changes)
Appendix 1

Survey of registrants who have reregistered since the establishment of the GPhC

In July and August 2012 pharmacists and pharmacy technicians who had reregistered since 27
d September 2010 were surveyed to find out why they had left the register and why they reregistered. The median length of time off the register was 3 years for pharmacists and 2 years for pharmacy technicians. Most reregistrants had practised since 1 January 2005, when CPD became compulsory, and were therefore eligible to reregister without undergoing any additional professional requirements. A small number of pharmacists had not been practising since 1 January 2005 and were required to complete a self-evaluation which was then evaluated by the GPhC.

Table 1: Size of survey and response rates

<table>
<thead>
<tr>
<th></th>
<th>PHARMACISTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met the criteria for inclusion</td>
<td>220</td>
</tr>
<tr>
<td>Email invitations to survey were sent (to people with email addresses on record)</td>
<td>205</td>
</tr>
<tr>
<td>Responses to the survey</td>
<td>37</td>
</tr>
<tr>
<td>Response rate</td>
<td>18%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>PHARMACY TECHNICIANS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met the criteria for inclusion</td>
<td>134</td>
</tr>
<tr>
<td>Email invitations to survey were sent (to people with email addresses on record)</td>
<td>123</td>
</tr>
<tr>
<td>Responses to the survey</td>
<td>26</td>
</tr>
<tr>
<td>Response rate</td>
<td>27%</td>
</tr>
</tbody>
</table>

Table 2: Pharmacists’ reasons for leaving the register and reasons for reregistering

<table>
<thead>
<tr>
<th>Reasons for leaving the register</th>
</tr>
</thead>
<tbody>
<tr>
<td>16 Going to work in another jurisdiction (i.e. moving abroad)</td>
</tr>
<tr>
<td>6 To start a family/ caring for young children</td>
</tr>
<tr>
<td>4 Other</td>
</tr>
</tbody>
</table>
 Reasons for reregistering

Reasons for returning related to returning back to the UK or the prospect of returning to the UK (17), returning back to work in pharmacy (8) often because of financial reasons. In some cases, there was overlap in these reasons. A few respondents said they used the opportunity to return to the register after being on the non-practising one.

Table 3: Pharmacy technicians’ reasons for leaving the register and reasons for reregistering

<table>
<thead>
<tr>
<th>Reasons for leaving the register</th>
<th>Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other: The predominant reason for going off the register was that registration for pharmacy technicians wasn’t compulsory. Most respondents also stated financial reasons – many had had their fees paid by an employer and with the change of jobs stopped receiving support, and were no longer required to be registered by new employer.</td>
<td>13</td>
</tr>
<tr>
<td>To start a family/ caring for young children</td>
<td>9</td>
</tr>
<tr>
<td>No longer working in pharmacy</td>
<td>3</td>
</tr>
<tr>
<td>Going to work in another jurisdiction (i.e. moving abroad)</td>
<td>1</td>
</tr>
<tr>
<td>Caring for a family member/ relative</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>26</td>
</tr>
</tbody>
</table>

Reasons for reregistering

Predominantly, compulsory registration.
Table 4: Evaluating the portfolio route to reregistration (pharmacists)

<table>
<thead>
<tr>
<th>The guidance provided all the information I needed to compile my portfolio</th>
<th>6</th>
<th>Strongly agree &amp; agree</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2</td>
<td>Strongly disagree &amp; disagree</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Don’t know</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>It was clear from the guidance how my portfolio would be assessed</th>
<th>3</th>
<th>Strongly agree &amp; agree</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>3</td>
<td>Strongly disagree &amp; disagree</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Don’t know</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The process of compiling the portfolio helped me to reflect on the skills and knowledge I would need for my intended area of practice</th>
<th>6</th>
<th>Strongly agree &amp; agree</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>Strongly disagree &amp; disagree</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Don’t know</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The process helped me to identify areas where I need more training or updating</th>
<th>7</th>
<th>Strongly agree &amp; agree</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>Strongly disagree &amp; disagree</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Don’t know</td>
</tr>
</tbody>
</table>

The survey was prepared and analysed by Riina Heinonen, Senior Research Officer, GPhC
Criteria for initial registration as a pharmacist

COMMENT - Now that registration is being renewed by registrants, the use of ‘initial’ is redundant. The document covers all registration applications.

September 2012
Criteria for initial registration as a pharmacist with the GPhC

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in England, Scotland and Wales.

This document sets out the education, training and experience requirements for initial registration as a pharmacist with the GPhC.

The registration process also includes health, character and identity checks.
Criteria for initial registration as a pharmacist with the GPhC

The criteria for initial registration as a pharmacist are set out below. Persons qualified in Great Britain must meet all the requirements set out in section 1 or, if they have completed an accredited foundation degree, section 2. Persons qualified in Northern Ireland need to meet all the requirements in section 3. Exempt persons need to meet the requirements of sections 4, 5 or 6. Persons previously registered as pharmacists with the Royal Pharmaceutical Society of Great Britain need to meet the requirements of section 7. COMMENT - A reference to the transitional procedure.

The circumstances where the Registrar can require persons to meet additional education, training or experience requirements before registration are set out in sections 8 to 12.

1. **Persons qualified in Great Britain (MPharm degree)**

   1.1 Successful completion of a Great Britain or Northern Ireland accredited 4 year MPharm degree, and

   1.2 successful completion of a 52 week programme of preregistration training in Great Britain, and

   1.3 pass a registration assessment conducted by the GPhC.

   1.4 Persons educated and trained in Great Britain must complete stages 1.1 to 1.3 and apply for registration as a pharmacist within 8 calendar years of commencement on an accredited MPharm degree or within 2 years of passing a registration assessment whichever is sooner. Extensions may be granted where there are legitimate, documented grounds for doing so.

   1.5 Paragraph 1.4 shall not apply to persons educated and trained in Great Britain entering or in preregistration training on the 12 November 2010.

   1.6 Persons educated and trained in Great Britain entering or in preregistration training on or before the 12 November 2010 must make an application to register before noon on 20 December 2013.

2. **Persons qualified in Great Britain (foundation degree in pharmacy + MPharm degree))**

   2.1 Successful completion of a part-time 2 year accredited foundation degree in pharmacy, and

   2.2 successful completion of years 2 to 4 of an accredited MPharm course, and

   2.3 successful completion of a 52 week programme of preregistration training in Great Britain, and

   2.4 pass a registration assessment conducted by the GPhC.

   2.5 Persons educated and trained in Great Britain must complete stages 2.1 to 2.4 and apply for registration as a pharmacist within 9 calendar years of registration on an accredited foundation degree course or within 2 years of passing a registration assessment whichever is sooner. Extensions may be granted where there are legitimate, documented grounds for doing so.
2.6 Paragraph 2.5 shall not apply to persons educated and trained in Great Britain entering or in preregistration training on the 12 November 2010.

2.7 Persons educated and trained in Great Britain entering or in preregistration training on or before the 12 November 2010 must make an application to register before noon on 20 December 2013.

3. Persons qualified in Northern Ireland

3.1 Possession of a Great Britain or Northern Ireland accredited pharmacy qualifications, and

3.2 successful completion of a 52 week programme of preregistration training in Northern Ireland, and

3.3 pass a registration examination conducted by the Pharmaceutical Society of Northern Ireland, and

3.4 current registration with the Pharmaceutical Society of Northern Ireland.

4. Exempt persons as defined in the Pharmacy Order with a qualification designated in the Privy Council Order

4.1 Possession of the qualification and work experience as described in the Order. Standards of proficiency are determined by home Member State and not by the GPhC.

5. Exempt persons as defined in the Pharmacy Order with a qualification and work experience covered by regulation 3(9)(a) or (e) of the European Communities (Recognition of Professional Qualifications) Regulations 2007 – the General Systems Regulations

5.1 Possession of the qualification and work experience covered by regulation 3(9)(a) or (e) of the General Systems Regulations.

5.2 An application for registration will be subject to scrutiny and evaluation. This involves a comparison of all qualifications and work experience completed by the applicant against the current national standards for registration - the MPharm indicative syllabus & learning outcomes, preregistration performance standards and the registration assessment syllabus (or standards which supersede these).

5.3 Where the theoretical and/or practical matters covered by the education and training which the applicant has received do not differ substantially from those currently required for qualification in Great Britain, the applicant is to be regarded as ‘appropriately qualified’.

6. Exempt persons as defined in the Pharmacy Order with a Community element but not covered by regulation 3(9)(a) or (e) of the General Systems Regulations.
6.1 Possession of a pharmacy qualification which entitles the applicant to practise in the country in which it was obtained.

6.2 Application considered according to EU Treaty rights and ECJ jurisprudence. The application for registration will be subject to scrutiny and evaluation. This involves comparison of all qualifications and work experience completed by the applicant against the current national standards for registration - the MPharm indicative syllabus & learning outcomes, preregistration performance standards and the registration assessment syllabus (or standards which supersede these). If no gaps are identified applicant is to be regarded as ‘appropriately qualified’.

7. Persons previously entered on Part 1 (Practising) of the Royal Pharmaceutical Society of Great Britain’s Register of Pharmaceutical Chemists or Register of Pharmacists

7.1 Previous registration on Part 1 (Practising) of the Royal Pharmaceutical Society of Great Britain’s Register of Pharmaceutical Chemists or Register of Pharmacists.

7.2 Paragraph 7.1 will cease to apply to persons applying for registration after 26 September 2012.

COMMENT- No longer applicable – the transitional provision
Circumstances where the Registrar can require the applicant to meet additional education, training or experience requirements

8. Persons entered previously registered as a pharmacist with on the Royal Pharmaceutical Society of Great Britain’s Register of Pharmaceutical Chemists or Register of Pharmacists other than on Part 1 (practising) of those Registers or the GPhC. COMMENT – The new process

8.1 An application for registration will be subject to scrutiny and evaluation. This involves an assessment of applicants’ professional competence. Applicants are required to submit a portfolio of evidence demonstrating their professional competence against the scope of practice they propose to practise within.

8.2 Paragraph 8.1 will cease to apply to persons applying for registration after 26 September 2012.

9. Exempt persons as defined in the Pharmacy Order with a qualification and work experience covered by regulation 3(9)(a) or (e) of the European Communities (Recognition of Professional Qualifications) Regulations 2007 – the General Systems Regulations.

9.1 Possession of the qualification and work experience covered by regulation 3(9)(a) or (e) of the General Systems Regulations.

9.2 The application for registration will be subject to scrutiny and evaluation. This involves comparison of all qualifications and work experience completed by the applicant against the current national standards for registration - the MPharm indicative syllabus & learning outcomes, preregistration performance standards and the registration assessment syllabus (or standards which supersede these). The applicant may be required to successfully complete a period of adaptation with assessment not exceeding three years where the theoretical and/or practical matters covered by the education and training which they have received differ substantially from those currently required for qualification in Great Britain.

9.3 ‘Substantially different matters’ is defined in the legislation and means matters of which knowledge is essential for pursuing the profession and with regard to which the training received by the applicant shows important differences in terms of duration or content from the training required in the UK.

9.4 Applicants have 2 years from the date of decision to commence the period of adaptation training with assessment. If they fail to do so they will need to make a new application.

10. Exempt persons as defined in the Pharmacy Order with a Community element but not covered by regulation 3(9)(a) or (e) of the General Systems Regulations.

10.1 Possession of a pharmacy qualification which entitles the applicant to practise in the country in which it was obtained.
10.2 Application considered according to EU Treaty rights and ECJ cases of jurisprudence. The application for registration will be subject to scrutiny and evaluation. This involves comparison of all qualifications and work experience completed by the applicant against the current national standards for registration - the MPharm indicative syllabus & learning outcomes, preregistration performance standards and the registration assessment syllabus. If gaps are identified, applicants can be required to successfully complete additional education and training proportionate to the gaps in knowledge identified. In these cases the additional education and training which can be required is not limited to a period of adaptation with assessment.

10.3 Applicants have 2 years from the date of decision to commence the additional education and training requirement with assessment. If they fail to do so will need to make a new application.

11. Persons (who may or may not be exempt persons) with a pharmacy qualification obtained outside Great Britain (this includes non-exempt persons with EEA qualifications), where the level of qualification has been assessed by UKNARIC (the National Academic Recognition and Information Centre for the United Kingdom) as being equivalent to at least British bachelor degree standard.

11.1 Possession of a pharmacy qualification which entitles the applicant to practise in the country in which it was obtained, and

11.2 a minimum degree duration of 3 years of undergraduate study in pharmacy related subjects as evidenced by an academic transcript, and

11.3 if non-exempt, a minimum score of 7 in each category of the academic level IELTS English language test at the same sitting of the test, and

11.4 successful completion of one year accredited Overseas Pharmacists’ Assessment Programme (OSPAP), and

11.5 successful completion of a 52 week programme of preregistration training in GB, and

11.6 pass a registration assessment conducted by the GPhC.

11.7 Applicants are given 2 academic years in which to commence the OSPAP. If they fail to do so they must make a new application.

12. Persons (who may or may not be exempt persons) with a pharmacy qualification obtained outside Great Britain, where the level of qualification has been assessed by UKNARIC (the National Academic Recognition and Information Centre for the United Kingdom) as being below British bachelor degree standard, or persons unable to comply with the application requirements to arrange requisite documents to be sent direct to the GPhC by the awarding institutions.

12.1 Possession of a pharmacy qualification which entitles the applicant to practise in the country in which it was obtained, and
12.2 a minimum degree duration of 3 years of undergraduate study in pharmacy related subjects as evidenced by an academic transcript, and

12.3 if non-exempt, a minimum score of 7 in each category of the academic level IELTS English language test at the same sitting of the test, and

12.4 a pre-OSPAP assessment.

12.5 Applicants must attend a pre-OSPAP assessment within 18 months of the decision that an interview is relevant to their case. If they fail to do so they will need to make a new application.

If an applicant passes a pre-OSPAP assessment, the education and training requirements for registration are

12.6 successful completion of one year accredited Overseas Pharmacists’ Assessment Programme (OSPAP), and

12.7 successful completion of a 52 week programme of preregistration training in Great Britain, and

12.8 pass a registration assessment conducted by the GPhC.

12.9 Applicants are given 2 academic years in which to commence the OSPAP. If they fail to do so they must make a new application.

If an applicant fails a pre-OSPAP assessment, the education and training requirements for registration are

12.9 successful completion of a Great Britain accredited MPharm, and

12.10 successful completion of a 52 week programme of preregistration training in Great Britain, and

12.11 pass a registration assessment conducted by the GPhC.

12.12 Alternatively, an applicant can be directed to complete requirements to register as a pharmacy technician.

13. Other requirements

13.1 Persons falling within sections 11 and 12 who are required to complete a one year accredited OSPAP, 52 week preregistration training and a registration assessment must complete all 3 stages and apply for registration as a pharmacist within 4 calendar years of commencement on an accredited OSPAP course. Extensions may be granted where there are legitimate, documented grounds for doing so.

13.2 Persons entering or in preregistration training on or before the 12 November 2010 must make an application to register before noon on 20 December 2013.
Criteria for initial registration as a pharmacy technician

COMMENT - Now that registration is being renewed by registrants, the use of 'initial' is redundant. The document covers all registration applications.
Criteria for initial registration as a pharmacy technician with the GPhC

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in England, Scotland and Wales.

This document sets out the qualifications and work experience required for initial registration as a pharmacy technician with the GPhC.

The registration process also includes health, character and identity checks.
Criteria for registration as a pharmacy technician from 1 July 2011

Persons seeking registration as a pharmacy technician from 1 July 2011 must possess the qualifications and work experience set out in the following sections.

1. United Kingdom qualified persons and persons who do not possess rights conferred by Directive 2005/36/EC or EC Treaty

1.1 Must complete

• one of the competency based qualifications listed in Annex A, and
• one of the knowledge based qualifications listed in Annex A, and
• provide evidence of having completed the qualifying periods of work experience set out in section 3.

1.2 Persons seeking registration as a pharmacy technician must apply for registration as a pharmacy technician within five calendar years of commencement on a recognised course, or within 2 years of completing the last recognised course, whichever is sooner.¹

1.3 The GPhC uses the term ‘recognised’ in the same way the RPSGB used ‘approved’ – that is to confirm that a national qualification is suitable for registration purposes.

2. Qualifications - see Annex A

3. Qualifying period of work experience

3.1 A minimum of two years relevant work-based experience in the UK under the supervision, direction or guidance of a pharmacist to whom the applicant was directly accountable for not less than 14 hours per week. A pre-registration trainee pharmacy technician must commence or register for one of the two required qualifications in Annex A within three months of commencing contracted, relevant work experience.

3.2 Within the two year period of training and work experience a minimum of 1260 hours of work experience must be undertaken under the supervision, direction or guidance of a pharmacist to whom the applicant is directly accountable, excluding sickness absence, maternity/paternity leave and holidays. A minimum of 315 hours of work experience

¹ Applications received before noon on 20 December 2013 which fall outside these time limits will be considered.
under the supervision, direction or guidance of a pharmacist to whom the applicant is
directly accountable must be undertaken in each of the two years.

3.3 A period of pharmacist preregistration training in the United Kingdom, Channel Islands
or the Isle of Man that can be validated by the GPhC and has been completed within
two years of commencing an approved pharmacy technician training programme may
be offset against the work experience requirements for registration.

3.4 In exceptional circumstances (for example, prolonged serious ill health or
maternity/paternity leave etc) an extension of the two year qualifying period of work
experience may be granted on application to the Registrar if supported by cogent and
sufficient evidence. The Registrar has the discretion to grant such an extension up to a
maximum of one year.

3.5 Instead of the two years relevant work experience described in 3.1, individuals with
non-UK pharmacist and pharmacy technician qualifications wishing to register as a
pharmacy technician must provide evidence of:

- a non-UK pharmacist or pharmacy technician qualification;
- being registered or otherwise eligible to practise as a pharmacist or pharmacy
technician outside the UK.

4. Persons previously registered as pharmacy technicians
4.1 Previous registration with either the General Pharmaceutical Council or the Royal
Pharmaceutical Society of Great Britain as a pharmacy technician.

4.2 Section 4.1 will cease to apply to persons applying for registration after 26 September
2012.

COMMENT - A transitional provision which is now not needed

4. Current or recent registration in Great Britain or Northern Ireland as a
pharmacist

4.1 Persons do not have to complete sections 1 to 3 if they

- are currently or have been until recently registered as a pharmacist with the General
Pharmaceutical Council, or
- are currently or have been until recently registered with the Pharmaceutical Society
of Northern Ireland in the practising part of the Register of Pharmaceutical
Chemists, or
have been registered as a pharmacist in the practising part of the Royal Pharmaceutical Society of Great Britain’s Register of Pharmaceutical Chemists or Register of Pharmacists. This condition does not apply to persons applying for registration after 26 September 2012.

5. **Persons who possess rights conferred by Directive 2005/36/EC or EC Treaty**

   65.1 A pharmacy qualification gained in an applicant’s country of qualification that would entitle them to practise as a pharmacist or pharmacy technician in that country, which has been recognised by a Member State and that individual has been permitted to work as a pharmacist or pharmacy technician in that Member State.

   65.2 A pharmacy technician qualification required in another Member State for the taking up or pursuit of the profession in its territory, such qualification having been awarded in a Member State, or if the profession is not regulated in that Member State full-time professional experience as a pharmacy technician for 2 years, or for an equivalent period on a part-time basis, during the previous 10 years.

   65.3 An application for registration will be subject to scrutiny and evaluation and the applicant may be required to complete an adaptation period not exceeding two years or take an aptitude test where the theoretical and/or practical matters covered by the education and training which they have received differ substantially from those required for qualification in Great Britain or where one or more regulated professional activities do not form part of the profession pursued by the applicant in the Member State from which they qualified or worked as a pharmacy technician, and that difference corresponds to specific education and training required in Great Britain and covers theoretical and/or practical matters which differ substantially from those covered by the evidence of education and training adduced by the applicant.

6. **Persons previously registered as a pharmacy technician with the Royal Pharmaceutical Society of Great Britain or the GPhC**

   6.1 An application for registration will be subject to scrutiny and evaluation. This involves an assessment of applicants’ professional competence. Applicants are required to submit a portfolio of evidence demonstrating their professional competence against the scope of practice they propose to practise within.

   6.2 Paragraph 6.1 will apply to persons applying for registration after 26 September 2012. COMMENT – section 6 shows the addition of a new route.
### Annex A
Eligible qualifications for registration as a pharmacy technician.

#### Competency

<table>
<thead>
<tr>
<th>Title</th>
<th>Awarding body/training provider</th>
<th>Code</th>
<th>Start date</th>
<th>End date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level 3 NVQ (NQF) Pharmacy Services</td>
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Criteria for registration as a pharmacist

September 2012
Criteria for registration as a pharmacist with the GPhC

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in England, Scotland and Wales.

This document sets out the education, training and experience requirements for initial registration as a pharmacist with the GPhC.

The registration process also includes health, character and identity checks.
Criteria for registration as a pharmacist with the GPhC

The criteria for registration as a pharmacist are set out below. Persons qualified in Great Britain must meet all the requirements set out in section 1 or, if they have completed an accredited foundation degree, section 2. Persons qualified in Northern Ireland need to meet all the requirements in section 3. Exempt persons need to meet the requirements of sections 4, 5 or 6.

The circumstances where the Registrar can require persons to meet additional education, training or experience requirements before registration are set out in sections 8 to 12.

1. Persons qualified in Great Britain (MPharm degree)

1.1 Successful completion of a Great Britain or Northern Ireland accredited 4 year MPharm degree, and

1.2 successful completion of a 52 week programme of preregistration training in Great Britain, and

1.3 pass a registration assessment conducted by the GPhC.

1.4 Persons educated and trained in Great Britain must complete stages 1.1 to 1.3 and apply for registration as a pharmacist within 8 calendar years of commencement on an accredited MPharm degree or within 2 years of passing a registration assessment whichever is sooner. Extensions may be granted where there are legitimate, documented grounds for doing so.

1.5 Paragraph 1.4 shall not apply to persons educated and trained in Great Britain entering or in preregistration training on the 12 November 2010.

1.6 Persons educated and trained in Great Britain entering or in preregistration training on or before the 12 November 2010 must make an application to register before noon on 20 December 2013.

2. Persons qualified in Great Britain (foundation degree in pharmacy + MPharm degree))

2.1 Successful completion of a part-time 2 year accredited foundation degree in pharmacy, and

2.2 successful completion of years 2 to 4 of an accredited MPharm course, and

2.3 successful completion of a 52 week programme of preregistration training in Great Britain, and

2.4 pass a registration assessment conducted by the GPhC.
2.5 Persons educated and trained in Great Britain must complete stages 2.1 to 2.4 and apply for registration as a pharmacist within 9 calendar years of registration on an accredited foundation degree course or within 2 years of passing a registration assessment whichever is sooner. Extensions may be granted where there are legitimate, documented grounds for doing so.

2.6 Paragraph 2.5 shall not apply to persons educated and trained in Great Britain entering or in preregistration training on the 12 November 2010.

2.7 Persons educated and trained in Great Britain entering or in preregistration training on or before the 12 November 2010 must make an application to register before noon on 20 December 2013.

3. Persons qualified in Northern Ireland

3.1 Possession of a Great Britain or Northern Ireland accredited pharmacy qualifications, and

3.2 successful completion of a 52 week programme of preregistration training in Northern Ireland, and

3.3 pass a registration examination conducted by the Pharmaceutical Society of Northern Ireland, and

3.4 current registration with the Pharmaceutical Society of Northern Ireland.

4. Exempt persons as defined in the Pharmacy Order with a qualification designated in the Privy Council Order

4.1 Possession of the qualification and work experience as described in the Order. Standards of proficiency are determined by home Member State and not by the GPhC.

5. Exempt persons as defined in the Pharmacy Order with a qualification and work experience covered by regulation 3(9)(a) or (e) of the European Communities (Recognition of Professional Qualifications) Regulations 2007 – the General Systems Regulations

5.1 Possession of the qualification and work experience covered by regulation 3(9)(a) or (e) of the General Systems Regulations.

5.2 An application for registration will be subject to scrutiny and evaluation. This involves a comparison of all qualifications and work experience completed by the applicant against the current national standards for registration - the MPharm indicative syllabus & learning outcomes, preregistration performance standards and the registration assessment syllabus (or standards which supersede these).
5.3 Where the theoretical and/or practical matters covered by the education and training which the applicant has received do not differ substantially from those currently required for qualification in Great Britain, the applicant is to be regarded as ‘appropriately qualified’.

6. **Exempt persons as defined in the Pharmacy Order with a Community element but not covered by regulation 3(9)(a) or (e) of the General Systems Regulations.**

6.1 Possession of a pharmacy qualification which entitles the applicant to practise in the country in which it was obtained.

6.2 Application considered according to EU Treaty rights and ECJ jurisprudence. The application for registration will be subject to scrutiny and evaluation. This involves comparison of all qualifications and work experience completed by the applicant against the current national standards for registration - the MPharm indicative syllabus & learning outcomes, preregistration performance standards and the registration assessment syllabus (or standards which supersede these). If no gaps are identified applicant is to be regarded as ‘appropriately qualified’.
Circumstances where the Registrar can require the applicant to meet additional education, training or experience requirements

8. Persons previously registered as a pharmacist with the Royal Pharmaceutical Society of Great Britain or the GPhC.

8.1 An application for registration will be subject to scrutiny and evaluation. This involves an assessment of applicants’ professional competence. Applicants are required to submit a portfolio of evidence demonstrating their professional competence against the scope of practice they propose to practise within.

8.2 Paragraph 8.1 will apply to persons applying for registration after 26 September 2012.

9. Exempt persons as defined in the Pharmacy Order with a qualification and work experience covered by regulation 3(9)(a) or (e) of the European Communities (Recognition of Professional Qualifications) Regulations 2007 – the General Systems Regulations.

9.1 Possession of the qualification and work experience covered by regulation 3(9)(a) or (e) of the General Systems Regulations.

9.2 The application for registration will be subject to scrutiny and evaluation. This involves comparison of all qualifications and work experience completed by the applicant against the current national standards for registration - the MPharm indicative syllabus & learning outcomes, preregistration performance standards and the registration assessment syllabus (or standards which supersede these). The applicant may be required to successfully complete a period of adaptation with assessment not exceeding three years where the theoretical and/or practical matters covered by the education and training which they have received differ substantially from those currently required for qualification in Great Britain.

9.3 ‘Substantially different matters’ is defined in the legislation and means matters of which knowledge is essential for pursuing the profession and with regard to which the training received by the applicant shows important differences in terms of duration or content from the training required in the UK.

9.4 Applicants have 2 years from the date of decision to commence the period of adaptation training with assessment. If they fail to do so they will need to make a new application.

10. Exempt persons as defined in the Pharmacy Order with a Community element but not covered by regulation 3(9)(a) or (e) of the General Systems Regulations.

10.1 Possession of a pharmacy qualification which entitles the applicant to practise in the country in which it was obtained.

10.2 Application considered according to EU Treaty rights and ECJ cases of jurisprudence. The application for registration will be subject to scrutiny and evaluation. This involves comparison of all qualifications and work experience completed by the applicant against
the current national standards for registration - the MPharm indicative syllabus & learning outcomes, preregistration performance standards and the registration assessment syllabus. If gaps are identified, applicants can be required to successfully complete additional education and training proportionate to the gaps in knowledge identified. In these cases the additional education and training which can be required is not limited to a period of adaptation with assessment.

10.3 Applicants have 2 years from the date of decision to commence the additional education and training requirement with assessment. If they fail to do so will need to make a new application.

11. **Persons (who may or may not be exempt persons) with a pharmacy qualification obtained outside Great Britain (this includes non-exempt persons with EEA qualifications), where the level of qualification has been assessed by UKNARIC (the National Academic Recognition and Information Centre for the United Kingdom) as being equivalent to at least British bachelor degree standard.**

11.1 Possession of a pharmacy qualification which entitles the applicant to practise in the country in which it was obtained, and

11.2 a minimum degree duration of 3 years of undergraduate study in pharmacy related subjects as evidenced by an academic transcript, and

11.3 if non-exempt, a minimum score of 7 in each category of the academic level IELTS English language test at the same sitting of the test, and

11.4 successful completion of one year accredited Overseas Pharmacists’ Assessment Programme (OSPAP), and

11.5 successful completion of a 52 week programme of preregistration training in GB, and

11.6 pass a registration assessment conducted by the GPhC.

11.7 Applicants are given 2 academic years in which to commence the OSPAP. If they fail to do so they must make a new application.

12. **Persons (who may or may not be exempt persons) with a pharmacy qualification obtained outside Great Britain, where the level of qualification has been assessed by UKNARIC (the National Academic Recognition and Information Centre for the United Kingdom) as being below British bachelor degree standard, or persons unable to comply with the application requirements to arrange requisite documents to be sent direct to the GPhC by the awarding institutions.**

12.1 Possession of a pharmacy qualification which entitles the applicant to practise in the country in which it was obtained, and

12.2 a minimum degree duration of 3 years of undergraduate study in pharmacy related subjects as evidenced by an academic transcript, and
12.3 if non-exempt, a minimum score of 7 in each category of the academic level IELTS English language test at the same sitting of the test, and

12.4 a pre-OSPAP assessment.

12.5 Applicants must attend a pre-OSPAP assessment within 18 months of the decision that an interview is relevant to their case. If they fail to do so they will need to make a new application.

If an applicant passes a pre-OSPAP assessment, the education and training requirements for registration are

12.6 successful completion of one year accredited Overseas Pharmacists’ Assessment Programme (OSPAP), and

12.7 successful completion of a 52 week programme of preregistration training in Great Britain, and

12.8 pass a registration assessment conducted by the GPhC.

12.9 Applicants are given 2 academic years in which to commence the OSPAP. If they fail to do so they must make a new application.

If an applicant fails a pre-OSPAP assessment, the education and training requirements for registration are

12.9 successful completion of a Great Britain accredited MPharm, and

12.10 successful completion of a 52 week programme of preregistration training in Great Britain, and

12.11 pass a registration assessment conducted by the GPhC.

12.12 Alternatively, an applicant can be directed to complete requirements to register as a pharmacy technician.

13. Other requirements

13.1 Persons falling within sections 11 and 12 who are required to complete a one year accredited OSPAP, 52 week preregistration training and a registration assessment must complete all 3 stages and apply for registration as a pharmacist within 4 calendar years of commencement on an accredited OSPAP course. Extensions may be granted where there are legitimate, documented grounds for doing so.

13.2 Persons entering or in preregistration training on or before the 12 November 2010 must make an application to register before noon on 20 December 2013.
Criteria for registration as a pharmacy technician

September 2012
Criteria for registration as a pharmacy technician with the GPhC

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in England, Scotland and Wales.

This document sets out the qualifications and work experience required for initial registration as a pharmacy technician with the GPhC.

The registration process also includes health, character and identity checks.
Criteria for registration as a pharmacy technician from 1 July 2011

Persons seeking registration as a pharmacy technician from 1 July 2011 must possess the qualifications and work experience set out in the following sections.

1. United Kingdom qualified persons and persons who do not possess rights conferred by Directive 2005/36/EC or EC Treaty

1.1 Must complete

- one of the competency based qualifications listed in Annex A, and
- one of the knowledge based qualifications listed in Annex A, and
- provide evidence of having completed the qualifying periods of work experience set out in section 3.

1.2 Persons seeking registration as a pharmacy technician must apply for registration as a pharmacy technician within five calendar years of commencement on a recognised course, or within 2 years of completing the last recognised course, whichever is sooner. ²

1.3 The GPhC uses the term ‘recognised’ in the same way the RPSGB used ‘approved’ – that is to confirm that a national qualification is suitable for registration purposes.

2. Qualifications - see Annex A

3. Qualifying period of work experience

3.1 A minimum of two years relevant work-based experience in the UK under the supervision, direction or guidance of a pharmacist to whom the applicant was directly accountable for not less than 14 hours per week. A pre-registration trainee pharmacy technician must commence or register for one of the two required qualifications in Annex A within three months of commencing contracted, relevant work experience.

3.2 Within the two year period of training and work experience a minimum of 1260 hours of work experience must be undertaken under the supervision, direction or guidance of a pharmacist to whom the applicant is directly accountable, excluding sickness absence, maternity/paternity leave and holidays. A minimum of 315 hours of work experience under the supervision, direction or guidance of a pharmacist to whom the applicant is directly accountable must be undertaken in each of the two years.

² Applications received before noon on 20 December 2013 which fall outside these time limits will be considered.
3.3 A period of pharmacist preregistration training in the United Kingdom, Channel Islands or the Isle of Man that can be validated by the GPhC and has been completed within two years of commencing an approved pharmacy technician training programme may be offset against the work experience requirements for registration.

3.4 In exceptional circumstances (for example, prolonged serious ill health or maternity/paternity leave etc) an extension of the two year qualifying period of work experience may be granted on application to the Registrar if supported by cogent and sufficient evidence. The Registrar has the discretion to grant such an extension up to a maximum of one year.

3.5 Instead of the two years relevant work experience described in 3.1, individuals with non-UK pharmacist and pharmacy technician qualifications wishing to register as a pharmacy technician must provide evidence of:

- a non-UK pharmacist or pharmacy technician qualification;
- being registered or otherwise eligible to practise as a pharmacist or pharmacy technician outside the UK.

4. Current or recent registration in Great Britain or Northern Ireland as a pharmacist

4.1 Persons do not have to complete sections 1 to 3 if they

- are currently or have been until recently registered as a pharmacist with the General Pharmaceutical Council, or
- are currently or have been until recently registered with the Pharmaceutical Society of Northern Ireland in the practising part of the Register of Pharmaceutical Chemists, or
- have been registered as a pharmacist in the practising part of the Royal Pharmaceutical Society of Great Britain’s Register of Pharmaceutical Chemists or Register of Pharmacists. This condition does not apply to persons applying for registration after 26 September 2012

5. Persons who possess rights conferred by Directive 2005/36/EC or EC Treaty

5.1 A pharmacy qualification gained in an applicant’s country of qualification that would entitle them to practise as a pharmacist or pharmacy technician in that country, which has been recognised by a Member State and that individual has been permitted to work as a pharmacist or pharmacy technician in that Member State.

5.2 A pharmacy technician qualification required in another Member State for the taking up or pursuit of the profession in its territory, such qualification having been awarded in a Member State, or if the profession is not regulated in that Member State full-time
professional experience as a pharmacy technician for 2 years, or for an equivalent period on a part-time basis, during the previous 10 years.

5.3 An application for registration will be subject to scrutiny and evaluation and the applicant may be required to complete an adaptation period not exceeding two years or take an aptitude test where the theoretical and/or practical matters covered by the education and training which they have received differ substantially from those required for qualification in Great Britain or where one or more regulated professional activities do not form part of the profession pursued by the applicant in the Member State from which they qualified or worked as a pharmacy technician, and that difference corresponds to specific education and training required in Great Britain and covers theoretical and/or practical matters which differ substantially from those covered by the evidence of education and training adduced by the applicant.

6. Persons previously registered as a pharmacy technician with the Royal Pharmaceutical Society of Great Britain or the GPhC

6.1 An application for registration will be subject to scrutiny and evaluation. This involves an assessment of applicants’ professional competence. Applicants are required to submit a portfolio of evidence demonstrating their professional competence against the scope of practice they propose to practise within.

6.2 Paragraph 6.1 will apply to persons applying for registration after 26 September 2012.
Annex A
Eligible qualifications for registration as a pharmacy technician.

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