Work experience requirements for initial registration of pharmacy technicians

Purpose
To consider proposed changes to the initial registration criteria for pharmacy technicians, previously agreed by Council.

Recommendations
The Council is asked to agree:

i. to proposed changes to the initial criteria for pharmacy technician registration, particularly the current work experience requirements for pharmacy technician registration subject to consultation.

ii. To hold a short consultation over six weeks with approval of the consultation paper to be delegated to the Chief Executive and Registrar.

iii. To delegate approval of the revised initial criteria for pharmacy technician registration to the Chief Executive and Registrar, subject to the outcomes of the consultation.

1.0 Introduction

1.1 At its meeting in September 2010 Council agreed the criteria for initial registration with the GPhC for both pharmacists and pharmacy technicians. Both the transitional (grandparenting) and post-transitional registration criteria agreed by Council state that individuals seeking registration as a pharmacy technician must, in addition to achieving an approved qualification or qualifications, complete a programme of training and work experience of not less than two years under the supervision, direction or guidance of a pharmacist.
to whom they are directly accountable.

1.2 Since the voluntary register first opened in January 2005 the start date for relevant work experience has been taken to be the date when the trainee started a recognised or accredited course (registration date for the NVQ or SVQ or start of an underpinning knowledge programme). Since the criteria for initial registration were published, some employers have approached us to highlight a potential problem whereby pharmacy technicians would not have met the criteria for initial registration in certain circumstances due to the timing of their employment contract and start of their vocational education.

1.3 Some trainees, particularly those working in hospitals, are often employed on two year fixed term training contracts which start ahead of the start date of their formal education and training and therefore expire before the two-year anniversary of their registration on a NVQ or SVQ or start date of their knowledge-based qualification, particularly if they achieve the latter through attendance at a further education college. The existence of a gap between taking up a two year contract and starting their vocational qualification, therefore means that they would fail to meet our registration criteria and would be unable to take up posts for which registration is required.

1.4 Employers do, of course, have the option of registering their students on the S/NVQ on the day that their employment contracts start, but it is clear from representations we have received that this has proved difficult for employers to do, particularly in NHS hospital environments where this particular issue has been identified.

2.0 Key Considerations

2.1 The principle of requiring a two-year programme of training and work experience prior to registration as a pharmacy technician has not been challenged. Indeed, the registration criteria for pharmacy technician registration were consulted on widely during 2002 and 2003, prior to the start of voluntary registration in January, 2005. Further consultation was carried out again towards the end of 2006 as part of a consultation on the rules underpinning the Pharmacists and Pharmacy Technicians’ Order 2007. The criteria adopted in 2003 were largely unchanged, but additional wording was included specifying that the two year period must be under the supervision, direction, or guidance of a pharmacist to whom [the trainee is] directly accountable because a number of applications for registration had been received from individuals who had completed the qualifications required for registration outside the pharmacy environment, for example, within a dispensing GP practice.
2.2 The 2006 criteria also clarified for the first time that the required two years of work experience could include the training period and/or experience gained overseas, but could not include work experience prior to the commencement of a pharmacy technician training programme.

3.0 Proposed changes to the registration criteria

3.1 The criteria agreed by Council were intended to protect patient safety and uphold the integrity of the register by ensuring a minimum level of work experience was undertaken alongside achievement of appropriate competency and knowledge based qualifications.

3.2 Having considered the representations we believe that a small amendment to the registration criteria for pharmacy technician would have no negative impact on patient safety and mitigate against the difficulty some employers are currently experiencing with trainee pharmacy technicians who fail to meet the current work experience requirements.

3.3 The alternative to agreeing to amendments could include leaving the criteria as currently drafted. Employees have known about the two-year work experience requirements for some time and could change their employment practices to align training contracts and work experience to the start date of pharmacy technician courses. This would, arguably, fail to meet Council’s commitment to being a flexible regulator.

3.4 The recommendation is to consult on a proposal to allow trainees to register between 21 months and 2 years after commencing a qualification or registering for the NVQ or SVQ in the following circumstances:

- Where a training contract of 2 years’ duration exists; and
- Where the preregistration trainee pharmacy technician has been awarded the qualifications required for registration; and
- Where two years of work experience has been completed under the supervision, direction or guidance of a pharmacist to whom the trainee was directly accountable.

3.5 This would require changes to paragraph 7, page 9 of the registration criteria for pharmacy technicians (see appendix 1).

4.0 Overseas qualified pharmacy technicians

4.1 After July 1, 2011 individuals with pharmacist and pharmacy technician qualifications gained outside the European Economic Area, will have to complete UK qualifications prior to registration in order to demonstrate that they
meet the standards required for registration. The registration criteria state that the GPhC will accept experience gained outside the UK as part of the qualifying work experience. In practice most applicants should be able to provide verifiable evidence of their previous qualifications. However, having reflected on the previous requirement to provide additional information about work experience overseas and our commitment as a regulator to be proportionate and risk based, we are proposing to remove the requirement for overseas qualified pharmacy technicians to provide evidence of work experience.

4.2 It is therefore recommended that the minimum 2-year work experience requirement for registration is waived in circumstances where an individual has achieved the UK qualification requirements for registration and:

- has previously been awarded a non-UK pharmacist or pharmacy technician qualification; and
- who is, or has been, qualified through registration or otherwise to practise as registered as a pharmacist or a pharmacy technician (where relevant) outside the UK.

5.0 Proposed consultation process

5.1 The priority for pre-registration trainee pharmacy technicians and employers is for urgent confirmation of any amendments to the requirements for registration. It is therefore proposed that a short six week consultation is carried out from 17 January until 28 February 2011. This would be followed by supplementary communication through pharmacy technician representative groups and employers.

5.2 Given that what is proposed are limited changes to a policy which has already been agreed by Council it is suggested that a short consultation document is drafted and, subject to Council’s agreement, approved on an exceptional basis by the Chief Executive and Registrar.

5.3 Assuming that the consultation reveals no further issues in the proposed policy amendment, we would ask Council to delegate final approval for the revised initial criteria for registration of pharmacy technicians to the Chief Executive and Registrar.

6.0 Equality and diversity implications

6.1 We do not believe that the proposed supplementary change to the initial registration criteria for pharmacy technicians has any equality and diversity implications.
7.0 Communications implications

7.1 If Council agrees to the proposed changes then we will test, through consultation, whether key interest groups agree that the proposed change can achieve an equal assurance of public safety and competence of newly qualified pharmacy technicians.

7.2 We will ensure additional communications to employers, particularly in hospital environments and across England, Wales and Scotland. Communication of the Council’s decision will also form a key part of a wider communications plan for publicising the end date of the transitional (grandparenting) arrangements for pharmacy technician registration and the implications for pharmacy technicians of the mandatory arrangements that will apply after 1 July, 2011.

8.0 Resource implications

8.1 We do not believe there are any additional resource implications as a result of the proposed supplementary changes. We believe that the proposed change to the planned assessment of work experience undertaken overseas will involve a less bureaucratic process and be more proportionate to the risks.

Recommendations

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iii. To delegate approval of the revised initial criteria for pharmacy technician registration to the Chief Executive and Registrar, subject to the outcomes of the consultation.

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