

# Analysis of the effects on equality

## Policy for registering pharmacists on a provisional basis following postponement of the registration assessments scheduled for 2020

|                               |                |             |              |
|-------------------------------|----------------|-------------|--------------|
| <b>Analysis completed by:</b> | Annette Ashley | <b>Date</b> | 30 June 2020 |
| <b>Decision approved by:</b>  | Mark Voce      | <b>Date</b> | 06 July 2020 |
| <b>Published on:</b>          |                | <b>Date</b> | [Date]       |

### 1. Aims and purpose of the policy

#### Who we are and what we do

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and pharmacies in Great Britain. We work to assure and improve standards of care for people using pharmacy services.

Our role is to protect the public and give them assurance that they will receive safe and effective care when using pharmacy services.

We set standards for pharmacy professionals and pharmacies to enter and remain on our register. We seek assurance that pharmacy professionals and pharmacies continue to meet our standards, including by inspecting pharmacies.

We act to protect the public and to uphold public confidence in pharmacy if there are concerns about a pharmacy professional or pharmacy on our register.

Through our work we help to promote professionalism, support continuous improvement and assure the quality and safety of pharmacy.

#### Purpose of the policy

On 26 March 2020, we announced that the registration assessments scheduled for June and September 2020 had been postponed due to the Government restrictions on public gatherings and requirement for social distancing caused by the coronavirus pandemic.

Due to the delay before a rescheduled assessment can take place,<sup>1</sup> we have been working on a form of provisional registration so that pre-registration trainees can begin working from August. This would

---

<sup>1</sup> Plans are underway to introduce an online registration assessment exam which should be available at the end of 2020 or early 2021.

have been the start date for those registrants who had passed the pre-registration assessment if it had taken place in June. Provisional registration is being put in place as a temporary measure during the COVID-19 emergency; provisionally registered pharmacists will have to sit and pass the registration assessment within a year to remain registered.

The purpose of the policy is to amend the criteria for registering as a pharmacist for a time-limited period in order to allow pre-registration trainees who have been unable to sit the registration assessment and who meet specific requirements to be provisionally entered on Part 1 of the register. The criteria for registering provisionally can be found **here**.

The decision to proceed with provisional registration was based on the following principles:

- To support the NHS and community pharmacy by strengthening the workforce at this critical time
- To maintain standards for entry to the register to protect patient safety and the quality of care given to patients and the public both now and over the long term
- To minimise blockages or gaps in the pipeline for qualified new registrants to join the profession in 2020 and in coming years
- To safeguard the welfare of students and trainees whilst also ensuring that their hard work, and that of their tutors, over many years is given suitable recognition at this key stage in their professional lives
- To enhance the transition from trainee to pharmacist by strengthening the framework of support in their initial period of work

The policy has been informed by discussions with a wide range of stakeholders, including trainee representatives, professional leadership and representative bodies, employers, members of the public, and education and training bodies across England, Scotland and Wales.

## Legislative framework

The Public Sector Equality Duty under section 149 of the Equality Act 2010 requires the GPhC, in the exercise of its functions, to have due regard to each of the statutory objectives, including the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

In addition, Article 4(3)(e) of the Pharmacy Order 2010 (“the Order”) states that one of the Council’s principal functions is to set standards and requirements in respect of the education, training, acquisition of experience and continual professional development that it is necessary for pharmacists and pharmacy technicians to achieve in order to be entered in the Register.

Article 7 of the Order states that the Council must set the standards that are to be met in connection with the carrying on of a retail pharmacy business at a registered pharmacy.

Articles 20 and 21 of the Order set out the requirements for pharmacists and pharmacy technicians to gain entry to the Register and for the pre-entry requirements in respect of qualifications and additional education, training and experience.

Under Article 42 of the Order, the Council must set the standards of proficiency for the safe and effective practice of pharmacy which it is necessary for a person to achieve in order to be entered in Part 1 of the Register (pharmacists) or Part 2 (pharmacy technicians).

Under Article 48 of the Order, the Council must set standards relating to the conduct, ethics and performance expected of registrants.

## 2. Review of available information

In order to assess the potential impact of the policy proposals from an equality, diversity and inclusion perspective, we considered a range of information and evidence including:

- Ongoing Government advice relating to COVID-19
- Feedback from, and concerns raised at:
  - A stakeholder engagement event held on 25 March 2020. See list of organisations who attended in Appendix A
  - A follow-up stakeholder engagement event held on 21 April 2020. See list of organisations who attended in Appendix B
  - Engagements with patient groups on 21 May 2020. See list of participant groups in Appendix C
  - Focus events held with patients/members of the public held on 10 and 12 June 2020
  - A stakeholder engagement event to discuss GPhC guidance for trainees and employers of provisionally registered pharmacists held on 25 June 2020. See list of organisations who attended in Appendix D
- We also received feedback and comments from:
  - UK Black Pharmacists Association (UKBPA) who consulted with their members
  - The BPSA who held a survey of their members on 21-22 March 2020, receiving 300 responses in 24 hours
  - Individual trainees who raised queries about provisional registration

## 3. Additional information relevant to equality and diversity issues

This table shows if this project or policy has any relevance to the equality and diversity issues below. If it is relevant to any of these issues, a full equality impact analysis will need to be carried out.

| Issue                         | Relevant?                           |                                     | Explanation |
|-------------------------------|-------------------------------------|-------------------------------------|-------------|
|                               | Yes                                 | No                                  |             |
| Age                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | See below   |
| Disability                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | See below   |
| Sex                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |             |
| Gender reassignment           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |             |
| Marriage or Civil Partnership | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |             |
| Pregnancy/Maternity           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | See below   |
| Race                          | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | See below   |
| Religion or belief            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |             |

| Issue                   | Relevant?                           |                                     | Explanation |
|-------------------------|-------------------------------------|-------------------------------------|-------------|
|                         | Yes                                 | No                                  |             |
| Sexual orientation      | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |             |
| Welsh Language Scheme   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |             |
| Other identified groups | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | See below   |

## 4. Decision on impact

Based on the table above, this policy requires a full impact analysis. This decision takes into account whether this policy or project would result in a substantial change or overall impact for pharmacy.

Yes  No

We have completed an analysis of the effects on equality consistent with our responsibilities as set out in the Equalities Act 2010. This includes an overview of the work we have completed to inform our understanding of the equality and diversity dimensions of the proposed changes; to identify any trends or issues that apply to people who share protected characteristics; and, to consider the potential impact on this range of equality groups.

In section 3 (above) we marked the categories where we believe there may be impacts on those who share protected characteristics.

The potential impact of the proposed changes in policy, from an equality and diversity perspective, has been included in the full impact assessment below.

## 5. Consultation and involvement

The policy was informed by discussions with a wide range of stakeholders, including trainee representatives, professional leadership and representative bodies, employers, education and training bodies across England, Scotland and Wales, trainees, patients and members of the public. The purpose of the stakeholder engagement was to gather views and feedback on our proposals for both provisional registration and holding an online registration assessment.<sup>2</sup>

Stakeholder engagement commenced on 25 March 2020 and closed on 25 June 2020. However, we will continue to engage with stakeholders throughout the course of provisional registration to assess any issues or developments that arise.

We are committed to making sure that provisional registration is compatible with our core values of equality, diversity and inclusion and we have sought feedback about how the proposed policy changes may impact upon these issues.

## 6. Full impact analysis

All of the stakeholders we consulted were broadly supportive of our policy to register pharmacists on a provisional basis following postponement of the registration assessments. Although they were supportive, stakeholders did raise a number of issues including some which potentially could have an impact from an equality, diversity and inclusion perspective. This included feedback relating to both

---

<sup>2</sup> There will be a separate EIA for the online registration assessment.

those who share protected characteristics, as well as other groups. These issues were used to amend and develop the proposal to help ensure that pre-registration trainees, members of the public and others are not disproportionately or unfairly affected by the proposed policy change.

There was a recognition amongst stakeholders of the importance of some form of provisional registration for the pre-registration trainees but also an acknowledgement of the need for the continuing provision of safe and effective pharmacy service and to maintain public confidence in the pharmacy sector.

Impacts on those with protected characteristics have been identified and ongoing work is being done to mitigate those issues, including engagement with relevant stakeholder groups. Overall, we do not anticipate that the policy will give rise to significant impacts on those with protected characteristics. We consider that provisional registration as set out in the policy is justified and is a proportionate means to achieve the aims of strengthening the pharmacy workforce; protecting patient safety; maintaining the quality of care provided by the pharmacy sector; safeguarding the welfare of students and trainees; and acknowledging their hard work and that of their tutors up to this point and at this critical time.

It is important to highlight that provisional registration is temporary and will no longer be available after 1 July 2021. All of those on the provisional register must undertake the online assessment as soon as they are able after it becomes available (either at the end of 2020 or early 2021). Efforts have been made, and monitoring will continue, to mitigate any negative actual or perceived impacts that have been identified.

## Age

We did not receive any specific feedback or information from our stakeholder engagement to suggest any disproportionate impact of the policy proposal in relation to age. The opportunity to provisionally register is available to registrants of all ages. However, we recognise that there could be a potential impact on people who have been identified as using online technologies less than other groups such as older people.

We are also aware that there are some pre-registration trainees who are older and may have caring responsibilities. They would therefore have had particular difficulties if we had tried to schedule the registration assessment either at venues or online in June/July when the restrictions due to the pandemic were/are still prevalent.

**What we will do:** To mitigate any negative impact to these groups, we will be developing supporting guidance on what needs to be done and how to provisionally register.

## Disability

We did not receive any specific feedback or information from our stakeholder engagement to suggest any disproportionate impact of the policy proposal in relation to disability. However, we recognise that there could be a potential impact on people who have been identified as using online technologies less than other groups such as those with physical disabilities.

We also recognise that there may be individuals who are currently excluded from applying for provisional registration under our current policy as, because of disability or illness, they will not have completed their pre-registration training in 2020 or been able to sit the assessment last year.

**What we will do:** We continue to take into account the continued importance of making adjustments for individuals based on their specific needs and circumstances and mitigate the risks that technologies pose to disabled people.

We have also amended the policy so that individuals who have completed their pre-registration training in 2019 and who did not take the exam (for whatever reason), and those individuals who have had their first assessment nullified in 2019 will be eligible to apply for provisional registration. All individuals would still have to obtain enhanced sign-off to be eligible.

## Gender (Sex)

We do not anticipate and did not receive any specific feedback or information from our stakeholder engagement to suggest any disproportionate impact of the policy proposal in relation to gender.

## Gender reassignment

We do not anticipate and did not receive any specific feedback or information from our stakeholder engagement to suggest any disproportionate impact of the policy proposal in relation to gender reassignment.

## Marriage or Civil Partnership

We do not anticipate and did not receive any specific feedback or information from our stakeholder engagement to suggest any disproportionate impact of the policy proposal in relation to marriage or civil partnership.

## Pregnancy/maternity

We have received specific feedback about the possible disproportionate impact of the policy proposal in relation to pregnancy and/or maternity.

We recognise that there may be individuals who are currently excluded from applying for provisional registration under our current policy as, because of pregnancy (or maternity), they will not have completed their pre-registration training in 2020 or been able to sit the assessment last year.

There were also concerns expressed by those pre reg students who are parents about the impact of school closures on their ability to work, study and be able to take the online assessment at home while caring for children.

**What we will do:** we have amended the policy so that individuals who have completed their pre-registration training in 2019 and who did not take the exam (for whatever reason), and those individuals who have had their first assessment nullified in 2019 will be eligible to apply for provisional registration. All individuals would still have to obtain enhanced sign-off to be eligible.

With regards to the online registration assessment: candidates will be given at least two months' notice of the exam, which will give them sufficient time to make arrangements to sit the registration assessment in a quiet location, which does not necessarily have to be at home.

With regards to working as a provisionally registered pharmacist it is important to remember that if schools remain partially closed, or if a second wave of the pandemic occurs which may necessitate restrictions in attendance, that pharmacists are key workers. This means that if a parent is working as a pharmacist, they can send their children to school or another educational setting during the COVID-19 outbreak.

## Race

We have received specific feedback during our stakeholder engagement about the disproportionate impact of the policy proposal in relation to race.

We recognise that the effects of COVID-19 are more serious for BAME groups and therefore individuals from this group may have reservations about becoming provisionally registered at this time and working in a public-facing setting. We were also asked how we were planning to ensure discrimination is minimised during the provisional registration period, when black pre-registration pharmacists may be particularly vulnerable.

Concern was expressed that there is variation in tutors experience and training, and questions asked about how subconscious barriers in students' supervision could be avoided when meeting standards for each sector of practice.

**What we will do:** as an organisation, we seek to ensure equality, diversity and inclusion in all our work. With regards to the COVID-19 pandemic we are carrying out Equality Impact Assessments (EIAs) on all the key changes we have put in place during the pandemic, including an EIA for this policy on provisional registration. This EIA has helped us to identify actions needed to make sure that employers and others are taking appropriate actions to ensure equality, diversity and inclusion when employing provisionally-registered pharmacists, and to make sure that provisional registrants are appropriately protected and supported in the workplace.

In our guidance for employers of provisionally registered pharmacists we have made it clear that in addition to the risk assessment that employers must carry out to keep their staff safe during the COVID-19 pandemic and reduce the risks of transmission, they must also carry out an additional, separate risk assessment for each provisionally registered pharmacist. The guidance states that employers must identify those at increased risk from COVID-19 and vulnerable members of staff within their team, including staff from BAME backgrounds and consider this information when making decisions about how to deploy provisionally registered pharmacists.

With reference to the concern about tutors and ways in which standards can be met for each sector of practice to avoid subconscious barriers in students' supervision: in addition to an enhanced sign-off from the relevant tutor, we are also asking the tutor for confirmation that they have obtained the views of a named second registrant or other healthcare professional who has either overseen the student's training as a Superintendent Pharmacist or Chief Pharmacist; been involved in the quality assurance of their training as a member of an education and training organisation; or worked with the trainee as a member of the pharmacy or hospital team and who has confirmed they have not seen any behaviours or practice which would prevent the individual meeting the standards for pharmacy professionals.

### **Religion or belief**

We do not anticipate and did not receive any specific feedback or information from our stakeholder engagement to suggest any disproportionate impact of the policy proposal in relation to religion or belief.

### **Sexual orientation**

We do not anticipate and did not receive any specific feedback or information from our stakeholder engagement to suggest any disproportionate impact of the policy proposal in relation to sexual orientation.

### **Welsh language scheme**

The changes as the result of the proposed policy do not raise any new issues or impacts in relation to the Welsh language scheme. Our current scheme (as published on our website [here](#)) sets out how we support and facilitate the needs of members of the public who prefer to communicate in Welsh.

## External findings relevant to our analysis of the impact on those sharing protected characteristics

As part of our analysis, we noted the recent PHE report on 'Disparities in the risk and outcomes of COVID-19'. The report presents findings based on surveillance data available to PHE at the time of its publication, including through linkage to broader health data sets. It confirms that the impact of COVID-19 has replicated existing health inequalities and, in some cases, has increased them.

The report is designed to improve understanding of the pandemic and to help formulate the future public health response to it. The information within the report has some broader relevance to our work in this context.

The report says that among people already diagnosed with COVID-19, the risk of dying is higher in those in Black, Asian and Minority Ethnic (BAME) groups than in White ethnic groups.

Due to the emerging information about health inequalities, we are continuing to assess the risks to certain groups, at a wider organisation level. We are carrying out equality impact assessment on all the key changes we have put in place during the pandemic and are undertaking risk assessments of our key regulatory activities through the lens of COVID-19, linked to our wider EDI strategy.

## Other identified groups

Regarding provisional registration, possible impacts on other groups have been identified; these are listed below, together with our responses and any actions that we have been able to take to mitigate those impacts:

- **Students have had to return home and may not have access to the same resources available at university**

**Our response:** The universities are aware of the issues caused to students by the pandemic and have put all the relevant resources and information online. Most textbooks and course materials were already available online before the pandemic.

Employers of provisionally registered pharmacists must also make provision for study time (further information is provided below).

- **How can a work visa, Tier 2, be extended if the current sponsor does not provide a placement?**

**Our response:** In this case they would need to contact the Foreign Office. There have been cases where, if the current sponsor does not provide a placement (or if they have had to leave their placement because there are issues), the outcome has been that they have had to return to their country of permanent residence.

- **Anxiety about the arrangements for overseas students that may need to go back to their country of permanent residence to wait for the renewal of the work visa before taking the registration exam.**

**Our response:** If an overseas student had to go back to their country of permanent residence to wait for the renewal of their visa before taking the registration exam, then as long as they still met the criteria for registration, then they could come back when they have the correct visa and secured a pre-registration place.

- **Concern from trainees sitting the registration assessment for the second or third time that they are being disadvantaged since they are not eligible for provisional registration**

**Our response:** We understand that anyone who has failed the registration assessment previously will be disappointed at not being eligible to apply for provisional registration. We are working hard to develop an online registration assessment and to schedule it as soon as possible, so that those who have previously failed the assessment have the opportunity to pass it and become registered. We are committed to ensuring that any delay in sitting the assessment will be as short as possible.

In setting the eligibility criteria for provisional registration, we considered very carefully how we could protect patient safety and quality of care, whilst also reasonably facilitating pre-registration trainees joining the register to maintain the workforce pipeline and ensuring that those joining the register on a provisional basis have up-to-date knowledge of pharmacy. After careful consideration, we decided to exclude from the provisional registration scheme those who have previously had the opportunity to demonstrate that they meet the standard, through the registration assessment, and have unfortunately failed to do so. We recognise the significant efforts people will have made to enhance their learning through further study and working as dispensers, for example. However, failure to pass the assessment provides clear and objective evidence that an individual has not yet demonstrated that they have met the required standard to be registered as a pharmacist.

We believe that those who are finishing their pre-registration year now and who have not yet had the opportunity to take the assessment due to the pandemic are in a different position. We think it is right that they are able to register provisionally, provided a number of requirements are met, including an enhanced tutor sign-off which involves seeking the views of another registrant or other healthcare professional confirming they have seen no evidence that the person will fail to meet the standards for pharmacy professionals.

- **Whether those working in community pharmacy as provisional registrants will have less access to support than those working in hospitals**

**Our response:** We have produced guidance for employers of provisionally registered pharmacists which clearly sets out what support an employer must provide to a pharmacist on the provisional register. This includes the need for a provisionally registered person to only practise under the guidance and direction of a senior pharmacist; for the senior pharmacist to be available to be contacted by the provisionally registered pharmacist; and for the senior pharmacist to conduct a monthly review of the risk assessment undertaken by the employer and update it as required. The senior pharmacist is also expected to report to GPhC if asked, on the conduct and performance of the provisionally registered pharmacist. The report will include the progress of the provisional registrant; their key development and learning areas; any concerns; and what support the senior pharmacist is providing.

Employers of provisionally registered pharmacists must also make provision for study time. Our guidance sets out that this provision should form part of the agreement made between the provisional registrant and the employer before the start of employment. The agreement should clarify what is expected of each party and is an opportunity to set clear expectations. We expect employers to support provisionally registered pharmacists to utilise their time in the lead up to the exam to plan and prepare for it.

- **Concern that being on the provisional register may have an impact when studying for the assessment**

**Our response:** Please see our previous response (above). In addition, our guidance for employers will set out expectations that the senior pharmacist will signpost provisional registrants to training and development opportunities; help them to identify a suitable mentor; encourage them to identify their own development needs and how they could be fulfilled; and encourage them to develop a peer support network.

It is also important to remember that while trainees will have to wait longer than usual to sit the registration assessment this year, in order to be eligible to register provisionally they must have been signed off by their tutor after week 39 of pre-reg training. This is the sign off that confirms that they are ready to sit the assessment.

- **Concern that those trainees who need flexibility in their work patterns are disadvantaged since provisional registrants are not allowed to work as locums or relief pharmacists**

**Our response:** it was felt that working as either a locum or relief pharmacist would not provide the support network needed by provisional registrants at this time.

## 7. Action needed as a result of the analysis

It is important to highlight that provisional registration is a temporary measure which will remain in place until July 2021. An online assessment process is currently being developed and will come into force in late 2020 – early 2021. The decision to provide provisional registration was based on a set of principles (as set out in the policy statement) which reflected the essential patient safety considerations; the importance of maintaining the workforce pipeline so that pharmacy can continue to serve the needs of patients; and to reflect the considerable education and training that has already taken place as well as trainees' expectations of joining the register from August 2020.

We are producing guidance for trainees and employers which will take into account the feedback received through stakeholder engagement. Both sets of guidance will set out the processes and requirements necessary to ensure eligibility for provisional registration.

## 8. Monitoring and review

### a) How will the implementation of the policy be monitored and by whom?

The implementation of the policy will be monitored by requiring employers and senior pharmacists to provide reports and risk assessments to the GPhC on demand and through any inspections that may be carried out over the period for which provisional registration applies.

### b) How will the results of monitoring be used to develop this proposal and its practices?

The information and feedback gathered through our stakeholder engagement is being used to develop guidance for trainees, tutors and employers of those on the provisional register. We will continue to engage with relevant stakeholders to develop and provide ongoing support to those on the register and to develop the proposal.

### c) What is the timetable for monitoring, including key dates?

Provisional registration is an interim measure; pre-registration trainees will be able to apply to join the register from 1 July 2020 and the provisional register will remain in place until 1 July 2021. During this period, individuals must sit the online registration assessment (which will be available at the end of 2020 or the beginning of 2021) at the first opportunity if they are fit to do so and must pass the assessment in

order to renew their registration upon expiry of the 12-month period of provisional registration. The GPhC will not extend the period of provisional registration. Any individual who fails the registration assessment will not be eligible to remain on the register; they will need to sit and pass the assessment at a future date in order to return to the register. In addition, it should be noted that the period of provisional registration will not be extended beyond 12 months. These measures are to ensure patient safety.

## 9. Summary of the analysis of the effects on equality

**This section sets out what action will be taken as a result of the analysis.**

|  |                                     |
|--|-------------------------------------|
| No impact identified: no change to the policy or project                         | <input type="checkbox"/>            |
| Equality impact identified: continue the policy                                  | <input type="checkbox"/>            |
| Equality and/or Welsh language impact identified: adjust the policy and continue | <input checked="" type="checkbox"/> |
| Equality and/or Welsh language impact identified: stop and remove the policy     | <input type="checkbox"/>            |

### The reasons for this decision are:

We have carefully considered the feedback from a wide range of stakeholders relating to the potential impact of our proposed policy on individuals, or groups, who share protected characteristics and any other impacted individuals or groups. We also took note of information and advice from the Government relating to COVID-19.

There is evidence that the proposed policy may have a negative impact on some individuals or groups who share protected characteristics, this includes: BAME groups, where possible impacts include being more vulnerable to COVID-19 and subconscious barriers in students' supervision; age and disability where a possible impact could be less use/familiarity with online technologies; and pregnancy or maternity where a possible impact may have led to them completing their pre-registration training in 2019 but not taking the pre-registration exam thereby making them ineligible for provisional registration.

We have taken a number of steps to mitigate the identified potential negative impacts of the policy; this includes developing supporting guidance for trainees and employers. The guidance for employers, for example, sets out the necessity of undertaking a separate risk assessment for each provisional registrant, which will identify and manage the specific risks for each person, including those with protected characteristics. All guidance will be published on our website before the policy comes into effect.

In addition, as a result of an issue raised by stakeholders around pregnancy and maternity we have amended the policy so that individuals who completed their pre-registration training in 2019<sup>3</sup> and who did not take the exam (for whatever reason), and those individuals who had their first assessment nullified in 2019 may be eligible for provisional registration if they meet the criteria.

Although the policy may potentially have negative impacts on some individuals, or groups, we believe that we have undertaken the necessary steps to reduce or remove those impacts. In addition, the

---

<sup>3</sup> The original policy stated that only individuals who completed their pre-registration training in 2020 would be eligible to apply for provisional registration.

overall support from our stakeholders, together with the adjustments we have made, means that the positive impacts of the policy far outweigh the negative. The positive impacts include:

- Supporting the NHS and community pharmacy by strengthening the workforce at this critical time
- Maintaining standards for entry to the register to protect patient safety and the quality of care given to patients and the public both now and over the long-term
- Minimising blockages or gaps in the pipeline for qualified new registrants to join the profession
- Safeguarding the welfare of students and trainees whilst also ensuring that their hard work, and that of their tutors, is given suitable recognition at this key stage in their professional lives
- Enhancing the transition from trainee to pharmacist by strengthening the framework of support in their initial period of work

The analysis of the effects of this policy on equality has identified the negative impacts. The positive impacts, together with the work done to mitigate the negative and amend the policy, means that it should continue. However, we will continue to monitor the equality impacts of this policy going forward and will take appropriate action where necessary.

July 2020

## 10. Appendix A

### Stakeholder event held on 25 March 2020

#### The following organisations were represented

Association of Independent Multiple Pharmacies (AIM)

Betsi Cadwaladr University Health Board

Boots (Walgreens Boots Alliance)

British Pharmaceutical Students' Association (BPSA)

British Pharmaceutical Students' Association (BPSA)

Community Pharmacy Scotland

Community Pharmacy Wales

Education and Improvement Wales

GPhC Board of Assessors

Health Education England (HEE)

Lloyds

National Pharmacy Association (NPA)

NHS Education for Scotland (NES)

NHS England and NHS Improvement

Pharmaceutical Services Negotiating Committee (PSNC)

Pharmaceutical Society of Northern Ireland (PSNI)

Pharmacy Schools Council  
Royal Pharmaceutical Society (RPS)  
Scottish Government Health and Social Care Directorate  
Well

## **11. Appendix B**

### **Stakeholder event held on 21 April 2020**

#### **The following organisations were represented**

Association of Independent Multiple Pharmacies (AIM)  
Betsi Cadwaladr University Health Board  
Boots (Walgreens Boots Alliance)  
British Pharmaceutical Students' Association (BPSA)  
British Pharmaceutical Students' Association (BPSA)  
Community Pharmacy Scotland  
Community Pharmacy Wales  
Education and Improvement Wales  
GPhC Board of Assessors  
Health Education England (HEE)  
Lloyds  
National Pharmacy Association (NPA)  
NHS Education for Scotland (NES)  
NHS England and NHS Improvement  
Pharmaceutical Services Negotiating Committee (PSNC)  
Pharmaceutical Society of Northern Ireland (PSNI)  
Pharmacy Schools Council  
Royal Pharmaceutical Society (RPS)  
Scottish Government Health and Social Care Directorate  
Well

## **12. Appendix C**

### **Stakeholder engagement held in May 2020**

#### **The following patient groups were approached for feedback**

Healthwatch England  
AvMA

Patients Association

Parkinson's UK

Alliance

Community Health Councils

## **13. Appendix D**

### **Stakeholder event held on 25 June 2020**

#### **The following organisations were represented**

Association of Independent Multiple Pharmacies (AIM)

Black Pharmacists' Association (BPA)

British Pharmaceutical Students' Association (BPSA)

Community Pharmacy Scotland (CPS)

Community Pharmacy Wales (CPW)

Company Chemists Association (CCA)

Directors of Pharmacy Scotland

Health Education and Improvement Wales (HEIW)

Health Education England (HEE)

Lloyds

National Pharmacy Association (NPA)

NHS Education for Scotland (NES)

NHS England and NHS Improvement (NHSE and NHSI)

Pharmaceutical Services Negotiating Committee (PSNC)

Pharmacists' Defence Association (PDA)

Pharmacist Support

Primary Care Pharmacy Association (PCPA)

Royal Pharmaceutical Society (RPS)