General Pharmaceutical Council

Buttercups Training support staff courses reaccreditation event report, July 2021

Contents

Event summary and conclusions

Provider	Buttercups Training
Course	Support staff course(s)
Names of courses	1. Dispensing Assistants (DA) 2. Medicines Counter Assistants (MCA) 3. Pharmacy Healthcare Assistants (HCA) 4. Pharmacy Delivery Drivers 5. Pharmacy Assistants in Manufacturing 6. Dispensary Stock Management 7. Pharmacy Support Worker Course 8. Pharmacy Services Assistant (PSA) Apprenticeship
Event type	Accreditation and reaccreditation
Event date	30 July 2021
Approval period	November 2021 – November 2024
Relevant requirements	[Requirements for the education and training of pharmacy support staff, October 2020](#)
Framework used	National Occupational Standards
Outcome	Approval The accreditation team has agreed to recommend to the Registrar of the General Pharmaceutical Council (GPhC) that the support staff courses for Dispensing Assistants, Medicines Counter Assistants, Pharmacy Healthcare Assistants, Delivery Drivers, Dispensary Stock Management, Pharmacy Assistants in Manufacturing and Pharmacy Services Assistant (PSA) Level 2 Apprenticeship, provided by Buttercups, should be reaccredited for a period of three years. Further, the accreditation team has also agreed to recommend to the Registrar of the General Pharmaceutical Council (GPhC) that the support staff Pharmacy Support Worker course, provided by Buttercups, should be accredited for a period of three years.
Conditions	There were no conditions
Standing conditions	A link to the standing conditions can be [found here](#).

Recommendations	No recommendations were made
Registrar decision	Following the event, the Registrar of the GPhC accepted the team's recommendation and approved the re/accreditation of pharmacy support staff courses (listed above) for a period of three years.
Key contact (provider)	Emma Seton, Chief Operating Officer
Accreditation team	Barbara Wensworth, Team Leader (Pharmacist) Currently Freelance Pharmacy Lecturer, Standards Verifier, assessor and writer
	Laura McEwen Smith, team member (Pharmacy technician) Strategic Project lead, Pharmacy and Primary Care Development, Health Education England
	Catherine Davies, team member (Pharmacy technician) Free-lance Education and Training provider
	Fiona Barber, team member (Lay member) Independent Member, Leicester City Council
Observers	Rebecca Chamberlain (observer - accreditation panel team leader in training)
	David Hatrapal (observer - accreditation panel member in training)
	Leanne Bartholomew (observer- accreditation panel member in training)
	Sheetal Jogia (observer - accreditation panel member in training)
	Alexander Dourish (observer - GPhC staff member in training)
GPhC representative	Chris McKendrick, Quality Assurance Officer, GPhC
Rapporteur	Dr Ian Marshall, Proprietor, Caldarvan Research (Educational and Writing Services); Emeritus Professor of Pharmacology, University of Strathclyde

Introduction

Role of the GPhC

The General Pharmaceutical Council (GPhC) is the statutory regulator for pharmacists and pharmacy technicians and is the accrediting body for pharmacy education in Great Britain. The approval process is based on the Requirements for the education and training of pharmacy support staff – October 2020.

GPhC in relation to the accreditation of pharmacy education are legislated in the Pharmacy Order 2010. For more information, visit: http://www.legislation.gov.uk/uksi/2010/231/contents/made

Background

The submitted documentation explained that Buttercups had made changes to its courses in order to meet the new regulatory standards for the education and training of support staff being released in 2020 in addition to the changes made to keep up-to-date with the sector, and the needs of employers, learners, and ultimately the public.

There were no recommendations or conditions from the previous Buttercups accreditation event, but a review of previous courses was undertaken, including feedback from a range of stakeholders such as learners, employers, the public, Buttercups staff and training commissioners. This stakeholder engagement provided direction on the training needs of Buttercups' employers and the public they serve, along with more specific feedback on areas where materials, training and delivery could be improved.

Documentation

Prior to the event, the provider submitted documentation to the GPhC in line with the agreed timescales. The documentation was reviewed by the accreditation team and it was deemed to be satisfactory to provide a basis for discussion.

Pre-event

In advance of the main event, a pre-event meeting took place by videoconference on 22 July 2021. The purpose of the pre-event meeting was to prepare for the event, allow the GPhC and the provider to ask any questions or seek clarification, and to finalise arrangements for the event.

The event

The event began with a private meeting of the accreditation team and GPhC representatives on 29 July 2021. The remainder of the event took place by videoconference on 30 July 2021 and comprised a series of meetings with the provider staff involved in the design of the courses.

Declarations of interest

Barbara Wensworth (team leader) declared that she had worked with Gail Hall previously and had a current friendship. Rebecca Chamberlain (observer) declared that she works for HEIW which commissions courses from Buttercups. Sheetal Jogia (observer) declared that she knew Gail Hall from the Association of Pharmacy Technicians UK.

The team agreed that none of the above represented a conflict of interest due to the team size and composition and observers having no formal input into the decision-making process.

Schedule

The event

Meeting number	Meeting	Time
Day 1 – 29 July 2021		
1.	Private meeting of accreditation/recognition team and GPhC representatives	14:00 –15:45
Day 2 – 30 July 2021		
2.	Private meeting of accreditation team and GPhC representatives	09:00 – 09:15
3.	Accreditation team and GPhC representatives meet with the course provider representatives	09:15 – 11:15
4.	Meeting to discuss the learning outcomes	11:30 – 12:30
5.	Meeting with internal and external quality assurance of the courses	13:30 – 14:15
6.	Private meeting of accreditation team and GPhC representatives	14:15 – 16:00
7.	Feedback to the course provider representatives	16:00 – 16:15

Attendees

Accreditation team

The GPhC's accreditation team ('the team') comprised:

Name	Designation at the time of accreditation event	Meetings attended
Barbara Wensworth	Team Leader (Pharmacist) Freelance Pharmacy Lecturer, Standards Verifier, assessor and writer	1-7
Laura McEwen Smith	Team member (Pharmacy technician) Strategic Project lead, Pharmacy and Primary Care Development, Health Education England	1-7
Catherine Davies	Team member (Pharmacy technician) Freelance Education and Training provider	1-7
Fiona Barber	Team member (Lay member) Independent Member, Leicester City Council	1-7

along with:

Name	Designation at the time of accreditation event	Meetings attended
Chris McKendrick	Quality Assurance Officer, GPhC	1-7
Ian Marshall	(Rapporteur), Proprietor, Caldarvan Research (Education and Writing Services)	1-7
David Hatrapal	(Observer - accreditation panel member in training)	1-7
Rebecca Chamberlain	(Observer - accreditation panel team leader in training)	1-7
Leanne Bartholomew	(Observer- accreditation panel member in training)	1-7
Sheetal Jogia	(Observer - accreditation panel member in training)	1-7
Alexander Dourish	(Observer - GPhC staff member in training)	1-7

*attended pre-visit meeting on 22 July 2021

Provider

The team met with the following representatives of the provider:

Name	Designation at the time of accreditation event	Meetings attended
Emma Seton*	Chief Operating Officer	3, 4, 5, 7
Gail Hall*	Course Development Lead	3, 4, 5, 7
Kathy Leung*	Course Development Pharmacist	3, 4, 7
Monisha Naik	Course Development Pharmacist	3, 4, 7

*attended pre-visit meeting on 22 July 2021

Documentation

Documentation provided in advance of the event:

- Completed submission template
- Evidence documents:
  - 35 appendices providing evidence in support of standards 1-9 (see Appendix 1)

Key findings - Part 1 - Outcomes for all support staff

During the event the accreditation team reviewed all (generic) outcomes for all support staff.

In relation to each course type (part 3's), the team also examined the mapping to ensure compliance with the selected National Occupational Standards (NOS) and the apprenticeship standard (not including the End Point Assessment).

To gain additional assurance the accreditation team also explored **one** learning outcome from the generic outcomes for all support staff, **four** NOS outcomes, and **one** apprenticeship outcome during a separate meeting with the provider and was satisfied that **all learning outcomes would be met** to the level mandated by the GPhC requirements.

Key findings - Part 2: Standards for the initial education and training

Criteria 1: equality, diversity and inclusion

Criteria met? Yes ☒ No ☐

The team was satisfied that all three criteria relating to equality, diversity and inclusion are or will be met

The submitted documentation stated that the company embeds EDI into all activities within the organisation, monitoring EDI data, where available, and promoting EDI values both with staff and learners, all overseen by an EDI committee. EDI hotspots are embedded into the online learning platform to highlight where learners need to be aware of EDI, such as when communicating with people who have additional needs.

A diverse range of names and images is used for case studies to reflect society and patients. EDI data about learners' ethnicity, gender and age is gathered for the level 2 apprenticeship programme and this will be extended to all courses.

Data from the level 2 apprenticeship framework programme between 2019 and 2020 suggested that Black Caribbean and male achievement rates are lower than other groups. The team was told that males were said to prefer interactive activities but have poor achievement levels, although the percentage of males on the courses is small compared to females. It was confirmed that a newly appointed EDI Officer will review attainment data and make recommendations.

Online teaching uses interactive activities which appeal to a variety of learning styles. Learners with known additional learning needs or a disability that may affect their ability to complete the courses are identified on enrolment and referred to referred to the Additional Learning Support Coordinator (ALSCo).

Criteria 2: course curriculum

Criteria met? Yes ☒ No ☐

The team was satisfied that all six criteria relating to course curriculum are or will be met

The documentation explained that the courses have been designed to include the core content which covers the learning outcome relevant to all staff, and then diverge in the technical modules which will be role specific. The team was told that Buttercups had arranged meetings with stakeholders, the main employers in different sectors, in which job descriptions had been interrogated before designing the courses. There had been liaison with the NHS and work with HEE North.

The Pharmacy Services Assistant (PSA) apprenticeship programme has been designed to deliver teaching, learning and formative assessment over the minimum training period of 12 months. The range of support staff courses is designed to align the knowledge, skills and behaviours being taught to the role, with emphasis on linking the theory to the experiential learning. Pharmacy support staff courses are mapped to the National Occupational Standards (NOS) framework, whereas the Pharmacy Services Assistant Apprenticeship is mapped to the Apprenticeship Standard.

A course choices document provides details on the content outline and tasks that are expected under each role. The syllabus has been mapped to the NOS, including the new NOS that have not been used before, looking particularly at the use of language and terminology. All learners on the pharmacy support staff courses study core modules 1 (Working in a Pharmacy Environment) and 2 (Teamwork and Person-Centred Care) and technical module(s) appropriate to their role. The courses are delivered as blended learning with delivery online, using a range of learning strategies that support different learning styles on the teaching platform (b-Hive).

The PSA apprenticeship programme uses virtual classrooms with live webinars facilitated by a Buttercups tutor including peer discussion and covering topics across the PSA curriculum. The application and demonstration of taught knowledge and skills in the workplace is achieved through a range of activities, including workplace observations which are validated by witness testimonies, Virtual Pharmacy ™ scenarios and activities in an activity book. Learners complete an introduction to law, ethics, standard operating procedures, health and safety, and pharmacy terminology before learning the skills required to undertake tasks. Course writers are pharmacy registrants and content are kept relevant and up-to-date through the Course Updates Process which includes stakeholder feedback, learners, workplace training supervisors (WTS), employers and course tutors. The team was told that updating the courses was an ongoing process, being reactive to changes in the law, the pandemic etc., but also involving horizon-scanning. Changes could be immediate or longer-term. Employers, tutors and learners can all contribute to the updating process which is either routine maintenance or reactive, depending on the type of change.

Each learner has a nominated workplace training supervisor (WTS), who will normally be a pharmacy registrant, but could be another registered healthcare professional or a specialist such as a GP in dispensing practice. There are specific training courses to support the WTS for each of the courses, after which the WTSs must complete an online test to confirm that they have read and understood their responsibilities. The team learned that the WTS training is slightly different for the apprenticeship and non-apprenticeship routes. The WTS non-apprenticeship course has examples for the WTS to practise, for example, good and bad activity books. The team was told that there had been some WTSs lacking confidence for the role that had been given extra support in the form of drop-in sessions for guidance and reassurance. Only a very small number had completely failed the WTS training.

Criteria 3: assessment

Criteria met? Yes ☒ No ☐

The team was satisfied that all four criteria relating to assessment are or will be met

There is a Support Staff Assessment Strategy for non-apprenticeship routes and a Level 2 Pharmacy Services Assistant Curriculum and Delivery Strategy for formative assessment of the apprenticeship route. The summative assessment for the apprenticeship is a set End Point Assessment but the summative assessment is completed by an independent End Point Assessment Organisation following the End Point Assessment requirements for the apprenticeship standards.

Learners are provided with scenario-based questions to help them understand the context of pharmacy practice, including principles such as person-centred care, professionalism and patient safety, allowing them to understand fundamental principles before undertaking practical activities in the workplace.

Learners are taught all underpinning knowledge components before being tested on these components through formative assessments and development opportunities. In relation to supervision of workplace activities, there is no set number of observations per NOS, this is instead left up to the workplace, but the expectation is that observations will be done on a daily basis.

An algorithm randomises MCQs and summative tests are invigilated. Routine QA maintenance ensures the currency of MCQs with any change of legislation triggering a review of the MCQs and any new questions being subject to the quality assurance process. The MCQ bank size is triple the number of questions required. For the apprenticeship route the MCQs are designed to reflect those of the end-point assessment. The team was told that the "does" level of achievement is not measured by MCQs but in activity books, based on observations of learners through witness testimony by a person working alongside the learner or directly by the WTS to ensure that activities are carried out competently. Ultimately, the WTS confirms that the learner can undertake the relevant activity to ensure that the "does" level has been achieved. The team was told that Buttercups checks for the consistency of WTS assessments with 100% of assessments being validated, with tests checked for standardisation. The validation process is then sampled using a risk-based sampling to reveal any potential inconsistencies.

Learners are assessed summatively after having completed formative assessments and been provided with developmental feedback; learners will not be undertaking new tasks and activities in the workplace without having undertaken prior teaching. For example, wishing to know how trainees not based in the pharmacy, such as delivery drivers, will be assessed on their competence, the team was told that delivery drivers will be double-teamed from the outset to ensure confidence. They will undertake the knowledge aspects of their course first before demonstrating their competence to a colleague during the double-teaming. Their workplace training supervisor (WTS) will be in the pharmacy but will delegate to an appropriately trained colleague while retaining overall accountability.

The team was told that with regard to patient safety, learners undertake EDI training and encounter EDI and safeguarding hotspots in the online materials. For example, delivery drivers must think about situations when no one is at home at the delivery address. Learners are instructed on how to report concerns. Patient safety issues are introduced early in the courses and developed thereafter. Learners

must demonstrate competence at the required level for all learning outcomes before they can be certificated. If a WTS has concerns about their learner's competence, ability to practice or apply teaching in pharmacy practice, they are encouraged to report concerns to Buttercups Training who can provide further support, investigate and provide further learning and assessment opportunities to ensure that learners are not certificated until they meet the required standard. Each of the interactive activities provides instant developmental feedback for the learners, or opportunities to repeat the activity. The team learned that the WTS cannot access the MCQ tests or feedback, but that the learner can print the feedback and share with the WTS if they wish. The WTS has to commit to provide feedback within ten working days on the workbook activities; this will be able to be logged and reported. For the PSA Apprenticeship course feedback is undertaken by the Buttercups tutor with the apprentice to track progress with feedback recorded within the e-portfolio, including developmental objectives for the period ahead along with feedback on performance in the last period of training.

Criteria 4: management, resources and capacity

Criteria met? Yes ☒ No ☐

The team was satisfied that all eight criteria relating to management, resources and capacity are or will be met

The Board is responsible for the governance of the company, with a Senior Management Team that leads day-to-day operations of the business. The responsibility for the tutoring and assessing of programmes lies with a Teaching, Learning and Assessment Department managed by the Head of Centre and consisting of over 70 GPhC registrants delivering pharmacy programmes at level 2 and level 3. There is a Safeguarding and Welfare Team responsible for identifying and investigating any safeguarding or welfare related issues, a Functional Skills Team consisting of mathematics and English tutors, and a Learner Review Team that completes induction and review calls with learners. The Head of Operations is responsible for updates to policies and SOPs and oversees the operations teams, while the Head of Client Services and Products leads the Client Relationship Team, which manages the learners through liaison with their respective head offices, using reports and email to facilitate the monitoring of learner progression and completion rates. In addition, there is an Apprenticeship Department responsible for the administrative support of learners on the apprenticeship programmes.

There is a customised learning management system (LMS) and a bespoke e-learning platform, the b-Hive, which hosts staff training as well as learner training. There are six main tutors that are pharmacy registrants dealing with the majority of the level 2 learners on the new standards apprenticeship and support staff courses, with one Internal Quality Assurer (IQA) overseeing them. Apprentices will have a specific tutor allocated for the duration of their course in a ratio of 1 tutor to 50 learners, except for the End Point Assessment which is undertaken externally. The team noted the different requirements for tutoring in the apprenticeship and non-apprenticeship routes and was told that Buttercups will continue to monitor workload and will probably need to expand the support assessor scheme; a new technical appointment has been made to assist with this. Employer agreements are completed as part of the enrolment process and the learner will complete a learner agreement in their course introduction module with the WTSs also confirming their accountabilities. Certification is automated through the LMS to ensure that the correct certificate is issued. The apprenticeship programme

certificate is issued by the Institute for Apprenticeships to Buttercups for forwarding to the learner on successful completion of the End Point Assessment. The Learner Handbook contains the policies and procedures for appeals, dealing with malpractice and plagiarism, along with a Learner Code of Conduct Policy to which the learner must adhere. Buttercups provides support to learners and workplace training supervisors who identify concerns about their workplace environment, or who have concerns about a colleague's behaviour or their fitness to practise which could compromise patient safety.

In terms of resources, the team noted the large numbers currently on the courses, many of whom have not completed on schedule, and the predicted numbers for the future and was told that Buttercups is building up capacity and streamlining its systems to cope with these numbers, which are under permanent review with workload monitored on a weekly basis. The non-completion rate was stated to be due mainly to the COVID-19 pandemic, with the withdrawal rate estimated at 10 percent; thus, a 90 percent eventual completion rate is expected. Buttercups will discuss with employers if WTSs are likely to become overloaded. In this respect, the WTS makes a declaration at the outset that they have sufficient time to supervise learners based on their own workload.

Criteria 5: quality management

Criteria met? Yes ☒ No ☐

The team was satisfied that all four criteria relating to quality management are or will be met

The documentation explained that the courses have been developed by an in-house product team, under the supervision of the Chief Pharmacist. The product team contains a mix of pharmacy registrants from different sector backgrounds, working alongside e-learning and technical specialists. The majority of those writing the teaching content are still in current patient-facing practice, to ensure that the programme is current and relevant. The courses undergo an ongoing cycle of maintenance/updates, with registrant staff in the Teaching, Learning and Assessment Team, with the Product Team monitoring all sources of changes and sharing updates where relevant, and making any immediate changes based on patient safety.

The Internal Quality Assessor (IQA) team reports to the Head of Centre and monitors the standards of assessment while the Head of Science and Teaching Development leads on the quality assurance of the teaching with a quarterly programme of teaching observations and learning walks. A programme of standardisation and training activities is informed by both the IQA and the observation processes. For the PSA Apprenticeship, the IQAs monitor the quality of formative assessment decisions and of feedback. This includes a sampling plan that ensures all assessors/tutors across all periods and activities are reviewed over time. IQA reports will be sampled and reviewed by another IQA to ensure consistency in feedback. The sampling for the apprenticeship programme is recorded in the e-portfolio system. Feedback is gathered from a wide range of employers, commissions, expert patients, learners, workplace training supervisors, staff, external quality assurance agencies, inspection agencies and subject matter experts. The team learned that patient feedback is gathered from the "Me and my medicines" group and from "Healthtalk", based on expert patients. Feedback from those on the course is intimated to employers by the Client Relationship Team and large organisations, commissioning bodies and trusts are able to monitor their learners' progress. Evaluations and reports are considered by the Board and the Senior Management Team, with any

issues raised being addressed and any negative feedback researched. The LMS permits learners and employers to access learners' records relating to their progress and create automated reports for employers. It can also generate completion rates via employer or via data relevant to equal opportunities such as additional needs.

Criteria 6: supporting learners and the learning experience

Criteria met? Yes ☒ No ☐

The team was satisfied that all five criteria relating to supporting learners and the learning experience are or will be met

Information is given to the employers at enrolment to ensure that they understand the time and opportunities required for the learner to meet the course requirements. Prior to starting, learners will complete an introduction module to highlight the key features of the programme, how it works on the e-learning platform, the assessment process and any rules and regulations for the course. The Learner Handbook includes all relevant policies and processes governing the programme. On completion of the introductory module, learners must submit a learner agreement electronically. To enable the WTS to effectively carry out their role, their course contains information on developing skills such as coaching, assessing and managing performance issues.

Learners and WTSs have access to support via email or phone, including a dedicated learner support phone line, operated by tutors and assessors, open during office hours and out of hours during evenings and weekends. All tutors have undergone training in teaching and assessment and are familiar with working with the range of teaching methods that make up the blended learning provision. Apprentices also complete a short introduction course on *How to Complete your Apprenticeship*, which details the requirements for the apprenticeship and introduces the associated terminology, for example Gateway and End Point Assessment (EPA). Their workplace training supervisors also have a training course to help them understand how the apprenticeship works and their role in supporting this. Learners are given access to designated Buttercups tutors who will be their main point of contact during their programme and who provide support and can signpost them to other resources or services.

 A Learner Support Team can deal with queries or direct the learner to an alternative tutor where necessary. In the case of problems with the learner/WTS/employer relationship, the team was told that concerns must be reported and that there is a system for monitoring learner progress. Learners with problems can be contacted for more support; employers will be contacted if learners are not on track. A risk assessment would be carried out for a WTS who was not a pharmacy registrant. For example, in a GP dispensing practice, the GP would hold accountable responsibility but delegate normally to a dispensary manager who would undertake the day-to-day supervision of the learner. The qualification, experience and currency in practice of the delegate would need to be stated.

Part 3 - Role-specific learning outcomes

 Please see the individual course(s) part 3 Report for commentary.