

General
Pharmaceutical
Council

Employing a provisionally- registered pharmacist

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About this document

This document sets out what employers must do to ensure safe and effective care and pharmacy services when employing a provisionally-registered pharmacist.

You should read this alongside our **standards for registered pharmacies**, which pharmacy owners must meet, and our **standards for pharmacy professionals**, which all pharmacy professionals, including provisionally-registered pharmacists, must meet.

As an employer, you are responsible for making sure that this document is followed as it is an important part of making sure that you meet our standards.

You are responsible for making sure that everyone in the pharmacy team is familiar with it, including managers with delegated responsibility. If the registered pharmacy is owned by a 'body corporate' (for example a company or an NHS organisation), you should make the Superintendent Pharmacist or Chief Pharmacist aware of this document.



Introduction

The registration assessment is the final requirement for registration following successful completion of the MPharm degree or OSPAP and pre-registration training. Due to the restrictions on public gatherings and the requirement for social distancing during the COVID-19 pandemic, the registration assessments scheduled for June and September 2020 were postponed.

Pending successful completion of the rescheduled assessment, our governing council has agreed a policy for registering pharmacists on a provisional basis. This is so that pre-registration trainees can begin working from 1 August 2020. This would have been the earliest start date for those who would have sat the June assessment.

The decision to provide provisional registration is based on the following principles:

- 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 support the NHS and community pharmacy by strengthening the workforce at this critical time
- to minimise blockages or gaps in the pipeline for qualified new registrants to join the profession in 2020 and in the 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 role of the employer

Risk assessment

Employers must complete a risk assessment before a provisionally-registered pharmacist starts work.

Governance arrangements safeguard the health, safety and wellbeing of patients and the public. They include having clear definitions of the roles and accountabilities of the people involved in providing and managing pharmacy services. This includes the arrangements for managing risk.

A risk assessment is required to identify and manage the risks associated with employing a provisionally-registered pharmacist. This must be carried out as a separate activity to risk assessments completed by employers for their staff to stay safe and reduce the risk of transmission during the COVID-19 pandemic.

Your risk assessment must take into account the context and circumstances of each individual setting that the provisionally-registered pharmacist may be working in. This includes the staff working in each setting and the activities of third parties, agents or contractors. You must complete a separate risk assessment for each provisionally-registered pharmacist you employ.

The risk assessment must include the following areas:

1. The context of practice

This includes:


- the nature and volume of services carried out in the locations where the provisionally-registered pharmacist will practise
- the nature and requirements of the people using the pharmacy services
- the likely impact on the person using the service, taking into account their health and vulnerability
- the organisational and clinical governance arrangements in place, including arrangements for controlling, managing and assuring the quality of care and services provided

2. The experience and qualifications of your current pharmacy team

You should determine this, using procedures which may already exist within your organisation, to make judgements about the appropriate number of staff and the skill mix.

You must:

- review the number of staff in the pharmacy who are competent and trained to deliver the pharmacy services and workload
- consider any feedback and concerns from the team that could be relevant
- identify those at increased risk from COVID-19 and vulnerable members of staff within your team, including staff from BAME



backgrounds. This information must be taken into account when making decisions about how to deploy provisionally-registered pharmacists

3. The provisionally-registered pharmacist's experience and portfolio of learning, particularly the sector(s) in which they undertook their pre-registration training

You must take into account:

- any information provided by the tutor
 - information from the provisionally-registered pharmacist, such as their portfolio of learning, which may include evidence that supports their performance and experience; for example, a personal development plan and accreditation and training certificates
 - the provisionally-registered pharmacist's experience of particular services; for example, supplying high-risk medicines and controlled drugs, providing on-call services
 - your assessment of the specific tasks or practices that the provisionally-registered pharmacist is competent to carry out
 - the provisionally-registered pharmacist's awareness and insight into their competence (this is because they will be required to meet the standards for pharmacy professionals which requires them to work within their areas of competence)
- whether the provisionally-registered pharmacist is looking to work in a sector different to the one in which they undertook their training, as they may have different learning experiences. For a provisionally-registered pharmacist wanting to work in a primary care setting, your risk assessment must consider whether the experiences they have had during their pre-registration training year supports this. Your risk assessment must clearly identify any gaps in learning that need to be addressed
 - whether the provisionally-registered pharmacist is suitably trained to carry out the range of services provided
 - the need to check that ongoing training plans are in place. You must specify ongoing training requirements to maintain and update the knowledge, skills and experience of the provisionally-registered pharmacist
 - the provisional registrant's knowledge of safeguarding awareness
 - the registrant's familiarity with the IT systems and standard operating procedures (SOPs) you have in place

You must review your risk assessment monthly or sooner if circumstances change; for example, following a concern arising from a provisionally-registered pharmacist's performance, or when you make significant business or operational changes.

Transparency and raising concerns

The assessment must also be reviewed if either you, a member of the team or the provisional registrant identifies an area of concern.

You must make sure that SOPs reflect any changes that are made in light of the risk assessment.

4. Risk mitigation measures

Having assessed, in detail, all of the risks, you must:

- document the measures that you and other members of your pharmacy team must put in place to mitigate the risks you have identified and how you will monitor whether the measures you have put in place are working

Examples of measures that could be taken include:

- restricting the scope of practice of the provisionally-registered pharmacist if you have identified a gap in their knowledge or experience in a particular area
- identifying and putting in place any learning or training support needed by the provisional registrant
- making changes to SOPs to incorporate additional safety measures
- providing additional oversight arrangements
- additional measures with respect to obtaining well-informed consent

In order to provide transparency to the people using your pharmacy services, you should make sure the provisionally-registered pharmacist understands the need to explain their provisional status, for example, if they are dealing with a complex enquiry and need to check with a senior pharmacist.

If the provisionally-registered pharmacist is operating as a Responsible Pharmacist (RP), their RP notice must identify their provisional status.

Providing transparency allows people using your services to raise concerns about the quality of the services, if there is a need. It is important to promote a culture of openness and learning, so that if something goes wrong you are confident that:

- there are systems and processes in place to identify, resolve and learn from incidents and complaints
- all members of the pharmacy team, including provisional registrants, have the knowledge and confidence to raise concerns about the quality of pharmacy services and, in particular, concerns about patient safety
- all members of the pharmacy team, including provisional registrants, know who they should contact within their individual pharmacy or wider organisation to raise concerns, without fear. This includes when staffing plans are not effective, and staffing levels and the skill mix may no longer be appropriate



Practising as a provisionally-registered pharmacist

The requirements set out below apply to all provisionally-registered pharmacists. Both the patient safety and support requirements are mandatory.

Provisionally-registered pharmacists:

1. must be employed directly by the organisation or business in which they are working
2. must not work as a locum pharmacist by which we mean they must not work on a self-employed basis, or only have a contract or agreement in place with a locum agency. However, working as a relief pharmacist or bank pharmacist within the organisation or business is acceptable
3. must practise under the guidance and direction of a senior pharmacist¹
4. are not eligible to be a Superintendent Pharmacist or Chief Pharmacist
5. may operate as the Responsible Pharmacist. However, they can't operate as a Responsible Pharmacist with responsibility for a Covid vaccination service delivered at or from a registered pharmacy (including in 'associated premises'). They may not be the pharmacist in charge of a vaccination service being provided in associated premises.
6. must be covered by professional indemnity insurance
7. must follow our standards for pharmacy professionals, which all pharmacy professionals must meet

¹ A provisionally-registered pharmacist may work in a primary care setting where there is no Superintendent or Chief Pharmacist, provided that the organisation:

- employs a senior clinician who is a registered healthcare professional (for example a Primary Care Network clinical director or GP partner) responsible for the safe delivery of services
- employs a senior pharmacist with at least two years' experience in the sector to

provide guidance and direction to the provisionally registered pharmacist

- provides a named clinical supervisor in the workplace (who may also be the senior pharmacist)

The senior pharmacist must complete the required risk assessment with the senior clinician, unless the clinical director or GP partner is also a senior pharmacist.

Patient safety requirements

Guidance and direction of a senior pharmacist

Provisionally-registered pharmacists must practise under the guidance and direction of a senior pharmacist, whose primary role is to provide clinical and practice support and guidance.

The senior pharmacist must be either:

- the owner of the registered pharmacy (in the context of a registered pharmacy owned by an individual pharmacist), or
- the Superintendent Pharmacist or Chief Pharmacist (or equivalent role), or
- a pharmacist with at least two years' experience who has been nominated by the Superintendent or Chief Pharmacist

The senior pharmacist may support more than one provisionally-registered pharmacist at any given time, if they have capacity to do so. The senior pharmacist must be available to be contacted to provide guidance and direction; their contact information should be clearly set out for the provisionally-registered pharmacist.

They can make contact in person or remotely: by phone or video link, for example. If the senior pharmacist is not available due to sickness or annual leave, then another suitably qualified senior pharmacist must be available to provide guidance and support to the provisionally-registered pharmacist.

The senior pharmacist must also make sure they are working within their competency and, if needed, address any necessary training needs, for example coaching and mentoring skills. Senior pharmacists should also identify support

networks and other senior pharmacists to support their development.

The senior pharmacist must conduct a monthly review of the risk assessment and update it as required. They must also complete reports on the provisionally-registered pharmacist's conduct and performance on a monthly basis and be able to provide these to the GPhC on demand. The report must include information on:

- the progress of the provisionally-registered pharmacist - for example, their progress against any objectives set, how they are managing their work and any problems that arise and how effectively they are working with others
- the registrant's competence and scope of practice
- their key development and learning areas
- the support that has been put in place to support the registrant
- any concerns that have been identified

Support requirements

Development support

The senior pharmacist or employer must signpost the provisionally-registered pharmacist to training and development opportunities provided by, for example, professional bodies, internal departments and education providers. This includes supporting them to identify a suitable mentor.

In anticipation of the registration assessment, the senior pharmacist or employer should encourage the provisionally-registered pharmacist to proactively identify their own



development needs and how they themselves will fulfil them.

Peer support

The senior pharmacist or employer should encourage the provisionally-registered pharmacist to develop a peer support network which may include other provisionally-registered pharmacists within the organisation, a previous tutor, and so on.

Provision for study time prior to the registration assessment

Before the start of employment, the employer, in conjunction with the provisionally-registered pharmacist, must set out how they will provide study time prior to the registration assessment. The amount and nature of the study time may vary according to the individual needs and circumstances of the provisionally-registered pharmacist but must be in addition to any study that may be carried out during the individual's annual leave or other free time.

Assessing the arrangements

We will check that the requirements set out in this document are being met, including through our inspectors and through specific requests for risk assessments and reports from senior pharmacists.

Any fitness to practise concern about a person who is registered provisionally will be investigated in line with the published organisational policy, with account taken of the context in which the person is working.

Annex A sets out the requirements, when they should be completed and who should complete them in a table.

Annex A

Tasks to be carried out when employing a provisionally-registered pharmacist

Person responsible	Task(s)	When
Employer	<p>Make sure that this document is familiar to everyone in the pharmacy team and that it is followed</p> <p>If owned by a 'body corporate', make the superintendent pharmacist or Chief Pharmacist aware of this document</p>	At the point a decision is made to employ a provisionally-registered pharmacist
Employer	<p>Carry out a separate risk assessment for each provisionally registered pharmacist employed (this assessment is in addition to the risk assessment that all employers must complete for their staff to stay safe and reduce the risk of transmission during the pandemic)</p> <p>The risk assessment must include:</p> <ol style="list-style-type: none"> 1. the context of practice 2. the experience and qualifications of your current pharmacy team 3. the provisionally-registered pharmacist's experience and portfolio of learning, particularly the sector(s) in which they undertook their pre-registration training 4. document the measures that you and other members of your pharmacy team must put in place to mitigate the risks, and how you will monitor this 	Before the provisionally-registered pharmacist starts work



Person responsible	Task(s)	When
Senior pharmacist	Conduct a monthly review of the risk assessment and update it as required	At least monthly, or sooner if a concern is raised about the provisional registrant; or there is a significant business or operational change
Senior pharmacist	Provide a report on the provisionally-registered pharmacist's conduct and performance. It must include: <ul style="list-style-type: none">- the progress of the provisionally-registered pharmacist- the registrant's competence and scope of practice- their key development and learning areas- the support that has been put in place to support the registrant- any concerns that have been identified	During the time the provisionally-registered pharmacist is working
Senior pharmacist	Provide contact information to the provisionally-registered pharmacist setting out who they can contact for guidance and direction at all times	Before the provisionally-registered pharmacist starts work and during their employment
Senior pharmacist	Address any necessary training needs that the senior pharmacist may have and identify support networks and other senior pharmacists to support their development	Before the provisionally-registered pharmacist starts work and during their employment

Person responsible	Task(s)	When
Employer or senior pharmacist	<p>Signpost the provisionally-registered pharmacist to training and development opportunities</p> <p>Encourage the provisionally-registered pharmacist to proactively identify their own development needs and how they themselves will fulfil them</p> <p>Encourage the provisionally-registered pharmacist to develop a peer support network</p>	Before the provisionally-registered pharmacist starts work and during their employment
Employer/senior pharmacist	Agree the provision of study time	Before the provisionally-registered pharmacist starts work

Other useful sources of information

- Our policy document, *Initial education and training standards for pharmacists: criteria for registering provisionally*, our guidance for tutors on completing the final progress report and declaration, and our guidance for trainees on provisional registration are all available on the **provisional registration page of our website**
- The **Royal Pharmaceutical Society mentoring platform** brings together pharmacists looking to mentor and pharmacists looking for a mentor
- **Healthcare Education and Improvement Wales** offer an ‘Effective mentoring’ course
- The **Centre for Pharmacy Postgraduate Education** offers a mentoring and coaching service to registrants working in the NHS in England
- The **UK Black Pharmacists Association** provide mentoring and networking support



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