Guidance for employers on the education and training requirements of pharmacy support staff

July 2020
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About this guidance

Pharmacy teams and the GPhC

We regulate pharmacists, pharmacy technicians and pharmacies in Great Britain. 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 have updated our education and training requirements for pharmacy support staff based on what we heard during our consultation and engagement, including how we should reflect developments in pharmacy practice and the role of pharmacy support staff in our requirements.

The new policy replaced our Interim policy on minimum training requirements for unregistered pharmacy staff – September 2018.

The purpose of this guidance is to assist employers when implementing the new support staff education and training requirements. Employers need to make sure they are aware of their responsibilities for staff operating in or from a registered pharmacy, and this guidance clarifies and explains key sections of the policy to help employers meet our requirements.

The guidance is also relevant to staff in non-registered pharmacies whose regulation is carried out by another regulator (such as the Care Quality Commission (CQC) in England, Health Improvement Scotland (HIS) in Scotland, Healthcare Inspectorate Wales (HIW) in Wales). Employers in non-registered-pharmacies can make use of these principles to assist the delivery of safe and effective pharmacy services, and to support pharmacy professionals to comply with their own professional and legal obligations.

The guidance aims to inform employers about how to meet these requirements, in particular, to understand:

- when their staff need to be trained
- what employers need to do for individuals who are exempt from training

It also provides information on issues such as enrolment in and completion of training, and ongoing education and training for support staff.

This guidance should be read alongside:

- Requirements for the education and training of pharmacy support staff (2020)
- Standards for registered pharmacies (2018)
- Guidance to ensure a safe and effective pharmacy team (2018)
- Working in pharmacy when not on the register (2017)
Education and training requirements

Requirements for the education and training of pharmacy support staff

Each pharmacy – in community, in hospital, in a health centre or other setting - will have a team to provide services. This team usually consists of registered pharmacy professionals (who must meet or are responsible for meeting our professional standards) - and pharmacy support staff (who are not registered with us but are accountable to their employer for their performance in their role).

Support staff are a major part of the pharmacy workforce.¹ They do not have the responsibilities or accountability of registered pharmacy professionals but play a key role in supporting the work of pharmacy professionals in providing safe and effective pharmacy services. Their accountability to their employer, who must meet our standards, also means they must perform their role in a way that meets our Standards for registered pharmacies.

Pharmacy support staff do many different activities in many different contexts. They often assist pharmacy professionals with dispensing and supplying medicines and devices as well as providing information and advice about medicines and pharmacy services. Making sure the supply of medicines to patients is safe and effective is a vital pharmacy service: if these roles are not performed well, they can risk the safety of people using pharmacy services and the ability of the whole pharmacy team to meet the standards we set.

New roles are appearing in different sectors of pharmacy and the boundaries between different support staff roles are becoming more fluid. While support staff working in different settings will require different skills, they all contribute to the safe and effective supply of medicines to the public and are required to be competent and knowledgeable. This is why it is important that all pharmacy support staff have the appropriate education and training for their particular role.

Meeting our education and training requirements means:

- demonstrating the relevant knowledge, understanding, abilities and behaviours for these roles at minimum Regulated Qualifications Framework (RQF) level 2, a Scottish Credit and Qualifications Framework (SCQF) level 5 (in Scotland) or a level accredited as equivalent to this. The RQF and SCQF are national frameworks that define different levels of knowledge which

¹In 2017, they accounted for close to half of the community pharmacy workforce in England, see The Community Pharmacy Workforce in England 2017. HEE (2018:13-14) (accessed December 2018). The NHS Workforce Statistics - October 2018 shows a smaller but still significant proportion of the hospital pharmacy workforce is made up of support staff- around 4,000 staff from a total workforce of 21,500- almost 20% of the hospital pharmacy workforce in England.
an employer can expect from an individual who has completed a course at that level.

- achieving the learning outcomes listed in the education and training requirements. These outcomes may be demonstrated by successfully completing or working towards completing GPhC approved training:
  - a nationally recognised pharmacy services qualification at minimum RQF L2/SCQF L5 in Scotland
  - a course accredited by us as covering the required learning outcomes at a level equivalent to RQF L2/SCQF L5
  - in England, an apprenticeship for pharmacy support staff that includes either of the above

You can find the list of approved pharmacy support staff courses on the Pharmacy support staff page of our website.

Three-month enrolment period

To start support staff training, an individual must be employed, either full-time or part-time, in a pharmacy. They must be enrolled on a training course as soon as practically possible and within three months of commencing their role.

Course completion time limit

Support staff must complete courses, at a pace which is compatible with safe practice, normally within three years. When trainees are nearing this time limit, employers should liaise with course providers to consider the reasons for the delay and whether an extension is appropriate or not. Employers and providers should consider factors that have caused the delay and whether a (further) reasonable adjustment is required, which will be particularly relevant where health or employment issues have contributed to the delay. They should take in to account their responsibilities under equality and human rights legislation and make sure that decision making is fair to the learner while making sure staff have acquired appropriate skills. Employers and providers must record their decision and the reasons for it clearly.
Support staff tasks and activities

Support staff tasks

Employers should identify the essential elements of training required by support staff. They should then make sure support staff receive appropriate training in the technical knowledge and skills required to perform their role in the dispensing and supply of medicines and medical devices safely and effectively. The following areas are designed to be indicative of key areas in which support staff will need to be competent. As the range of activities and settings changes and evolves, the areas and tasks for which staff will need to be competent will change. Employers will need to make sure staff are trained appropriately whether performing tasks in person or at a distance. This may include, but is not limited to, knowledge and skills required to:

- order, receive and store medicines and pharmacy stock
- receive and collect prescriptions
- assemble, dispense and supply a prescription
- give advice and information about and sell non-prescription medicines or devices to individuals safely, referring to another member of the pharmacy team where necessary
- prepare for or assist in the manufacture of medicines and medical devices for individual use, including specialised manufacturing practices such as aseptic production
- assist in the provision of information to individuals on:
  - the effective use of medicines/medical devices
  - accessing and using healthcare services
  - symptoms, their health and its management
  - services to help individuals manage conditions
  - promoting healthy lifestyles or other health needs
- provide a collection or delivery service to individuals
- dispose of medicines and medical devices safely or advise on their safe disposal
- carry out checking and other quality control processes in the dispensing and supply of medicines
- assist pharmacy professionals to provide a pharmacy service in person, at a distance, remotely, or in a setting away from a registered pharmacy. For example, this could involve assisting pharmacy professionals in:
  - the management of medicines for individuals
  - the process of preparing and administering tests and or treatments to individuals
  - taking clinical measurements
Case studies of support staff job roles that require training

Below are some examples of support staff roles that require technical knowledge and skills and therefore would require tailored training under the new requirements.

Case study: a pharmacy delivery driver

A pharmacy delivery driver who collects prescriptions from doctors’ surgeries, delivers them to pharmacies, and delivers medicines to patients.

Employers must work with course providers to make sure the technical knowledge and skills content of the course is relevant to the tasks carried out in the role. It should be derived from and mapped to an appropriate knowledge and skills framework for pharmacy services in the UK, such as the National Occupational Standards framework.

In this example, the delivery drivers may complete the following tasks as part of their role and therefore will be required to complete tailored training. The list below is indicative and may include but is not limited to:

- providing a delivery service to individuals
- disposing of medicines and medical devices safely or advise on their safe disposal
- assisting pharmacy professionals to provide a pharmacy service in a setting away from a registered pharmacy
- disposing of medicines and medical devices safely or advise on their safe disposal
- carrying out checking and other quality control processes in the dispensing and supply of medicines

Case study: a member of a hospital pharmacy support staff team

A member of a hospital pharmacy support staff team who works in an aseptic unit. The support staff member aseptically prepares a range of medicinal products for administration to patients.

Employers must work with course providers to make sure the technical knowledge and skills content of the course is relevant to the tasks carried out in the role. It should be derived from and mapped to an appropriate knowledge and skills framework for pharmacy services in the UK, such as the National Occupational Standards framework.

In this example, the individual member of support staff may complete the following tasks as part of their role and therefore will be required to complete tailored training. The list below is indicative and may include but is not limited to:

- preparing for/assist in the manufacture of medicines and medical devices for individual use, including specialised manufacturing practices such as aseptic production
- ordering, receiving and storing medicines and pharmacy stock
- disposing of medicines and medical devices safely or advise on their safe disposal
- carrying out checking and other quality control processes in the dispensing and supply of medicines
Case study: a member of the support staff team in a ‘hub’ pharmacy

A support staff member who works at a ‘hub’ pharmacy in various capacities such as stocking, supplying and preparing medicines.

Employers must work with course providers to make sure the technical knowledge and skills content of the course is relevant to the tasks carried out in the role. It should be derived from and mapped to an appropriate knowledge and skills framework for pharmacy services in the UK, such as the National Occupational Standards framework.

‘Hub’ pharmacy support staff may complete the following tasks as part of their role and therefore will be required to complete tailored training. The list below is indicative and may include but is not limited to:

- ordering, receiving and storing medicines and pharmacy stock
- receiving and collecting prescriptions
- assembling, dispensing and supplying a prescription
- carrying out checking and other quality control processes in the dispensing and supply of medicines
- disposing of medicines and medical devices safely or advise on their safe disposal
Activities that fall outside of the GPhC education and training requirements for pharmacy support staff

Examples of roles that would not require this training can be seen below and may include but is not limited to:

- non-registrant pharmacy managers and those with managerial or directorial roles within the pharmacy
- staff who provide services that support the running of pharmacy services but do not provide or assist in providing this service to patients and the public, (such as staff who provide or maintain pharmacy IT systems)
- roles within a pharmacy premises working exclusively in the sale of items other than medicines or medical devices but sold alongside the pharmacy business (such as cosmetics or food)
- students who are carrying out educational placements, work experience, traineeships or other tasks for educational purposes under appropriate supervision
- staff responsible for stocking shelves of general sales list (GSL) medicines

Identifying training needs for other job roles

Support staff roles vary widely, and the variation is increasing. Our 2005 requirements identified traditional roles involving dispensing prescriptions and selling non-prescription medicines. In recent years, the range of activities performed by support staff has expanded, with staff working to provide services in the hub pharmacy of a ‘hub and spoke’ pharmacy arrangement, supplying medicines, manufacturing and preparing (often in specialised conditions), providing delivery services, advising pharmacy using pharmacy services remotely, and assisting pharmacy professionals to provide other services.

Employers may find that it may not always be clear if a member of staff needs training for their role. In cases such as this, employers will need to:

- look at the tasks listed in the section above which are examples of the kind of tasks we expect support staff to be trained for, if undertaken as part of their role.
- consider the functions of the role and make a decision based upon the risk to patients and public safety if the support staff role is performed without training.

Employers must be able to demonstrate the rationale behind making their decisions in such cases during GPhC inspections.

Where there is no GPhC-approved training to cover a particular aspect of an individual

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2 see the Guidance to ensure a safe and effective pharmacy team on issues relevant to these roles
member of support staff’s role, the employer still needs to make sure the individual has appropriate knowledge, skills and competence for their role and the tasks they carry out. The employer can do so by arranging appropriate training to meet the requirements above and organising additional training to cover any aspects not covered. Staff would not be required to re-take training once GPhC-approved training becomes available.
Exemptions

The following exemptions can be made from the GPhC training requirements, for specific groups of support staff.

Educational exemptions

Individuals who are participating in educational placements, traineeships, work experience or who are carrying out other tasks for educational purposes under appropriate supervision are not required to complete additional training. They are exempt from this requirement, as they have been in previous versions of this policy. For example, this includes students completing placements as part of a GPhC accredited Master of Pharmacy (MPharm) degree, Overseas Pharmacist Assessment Programme (OSPAP), pre-registration pharmacist trainees, or trainee pharmacy technicians.

Students employed as support staff

Students on MPharm or OSPAP programmes, pre-registration trainee pharmacists, or trainee pharmacy technicians who are employed as support staff may continue to work in support staff roles without completing specific support staff training. This is because they will be participating in an educational programme recognised by us.

As part of the current requirements, in this case, their employer should:

- make sure an assessment of the knowledge, skills and experience of the student relevant to the role undertaken is carried out; the assessment itself should be undertaken by a registered pharmacy professional
- identify any further learning or experience required by the student to carry out the tasks within the role
- make arrangements to provide the student with any further skills knowledge and experience, and the supervision required to work safely in their role. This may be carried out by the employer themselves ‘in-house’, or through an approved training course
- make and retain clear records of this assessment in line with our Guidance to ensure a safe and effective pharmacy team.

Examples of using the learning needs assessment template

Appendix 1 includes completed examples of the student and pre-registration training needs assessment template. The blank template is available on our website.

Historic exemptions

The requirements in this policy do not apply retrospectively. This means that individuals who have already met our previous requirements (set out in earlier versions of this policy) do not have to do so again. This includes those who were exempted from training by previous versions of this policy (see appendix 2 for a list).

Staff who are already in post and who were not required to complete approved training by previous versions of our requirements are not required to complete further training to meet the current requirements unless their role has changed, in which case further training may be
required. Their employer should keep a record of their start date and the training they have received for their role. But if the individual’s role has changed since these current requirements have been in place, they may need further training.

**Groups not exempt from training**

Individuals who have previously been registered as pharmacy professionals, but who are not currently registered are not exempted from these requirements if they are employed as support staff.

This means that retired or former pharmacists and pharmacy technicians will need to complete training relevant to their support staff role, as set out in our guidance on working in pharmacy when not on the register.

When we refer to individuals who are no longer registered, this includes people who are subject to an interim order, or who are suspended or removed from the register, either by a statutory committee or voluntarily. This also includes retired, former pharmacists and pharmacy technicians.

Anyone who wants to continue to be involved in day-to-day pharmacy work on registered premises when they are no longer registered, including during the course of their suspension, must discuss this with their employer. Further information can be found in our guidance on working in pharmacy when not on the register.

**Recognition of prior learning**

We encourage employers to work with course providers to consider recognising the prior learning of individuals who already hold relevant knowledge, skills or experience so that individuals are not required to repeat learning they have already covered and can transfer their existing learning to new activities efficiently.
Ongoing training and development

Learning and development

Providing safe and effective care is the responsibility of the whole pharmacy team. While some roles may have specific responsibilities, our standards for registered pharmacies require that all staff are empowered and competent to safeguard the health, safety and wellbeing of patients and the public.

Pharmacy support staff are responsible for supporting pharmacy professionals to provide safe and effective pharmacy services.

It is the responsibility of the employer to make sure that support staff undergoing training have access in their place of work to individuals who can help them with academic and pastoral issues related to the course.

Our guidance to ensure a safe and effective pharmacy team explains that pharmacy owners, working with pharmacy professionals, should:

- encourage and enable all staff – particularly those still in training – to reflect on their performance, knowledge and skills, and to identify learning and development needs
- support them in meeting those needs, to enable them to carry out their role

This includes, but is not limited to:

- understanding the learning and development needs of their team and taking appropriate steps to meet those needs, preferably making protected time available for learning and development
- making sure pharmacy staff work within the limits of their competence and refer to other, more appropriate, staff when they need to
- making sure everyone in the pharmacy team, with the help of other members of the team, within the resources provided, keeps their knowledge and skills up to date
- making sure managers have the competence, skills and experience needed to carry out their role
- identifying essential elements of training for each role within the team, and actively reviewing and reassessing these in response to changing needs and circumstances, and ensuring any changes are made in a timely manner
- demonstrating that learning and development is taking place
- making sure individual and team development plans are in place to so pharmacy staff are not carrying out activities they have not been trained for
- taking a tailored approach to learning and development which is continued throughout individuals’ employment to make sure the knowledge and skills of pharmacy staff remain up to date
Changing or expanding roles

It is the duty of the employer to continuously assess the education and training needs for their staff members as activities and duties may change. Employers should:

- actively review and reassess the knowledge, skills and experience for each role in the team
- review the requirements of the role and the skills of their staff and arrange any additional training required if a staff member changes their role, or their tasks or responsibilities expand or change

For more information please see our guidance to ensure a safe and effective pharmacy team.
Appendices

Appendix 1: Examples of using the training needs assessment template

Student and pre-registration training needs assessment - example 1

Learning needs assessment for MPharm/OSPAP student and pre-registration trainees employed as support staff

Students on MPharm or OSPAP programmes and pre-registration trainees who are employed as support staff may continue to work in support staff roles without completing specific support staff training. This is because they will be participating in an educational programme recognised by us. In this case, their employer should:

- carry out an assessment of the knowledge, skills and experience of the student relevant to the role undertaken; the assessment itself should be undertaken by a registered pharmacy professional
- identify any further learning or experience required by the student to carry out the tasks within the role
- make arrangements to provide the student with any further knowledge, skills and experience, and the supervision required to work safely in their role. This may be carried out by the employer themselves ‘in-house’, or through an approved training course.

<table>
<thead>
<tr>
<th>Name of the pharmacy:</th>
<th>Example pharmacy 1</th>
</tr>
</thead>
</table>
| Pharmacy professional completing the assessment (please include registration number): | Example pharmacist  
Registration number: 0123456 |
| Name of the student/pre-registration trainee: | Example first year MPharm student |
| The support staff role: | Working on the medicines counter |
## Learning needs assessment for MPharm/OSPAP student and pre-registration trainees employed as support staff

### Previous experience relevant to the support staff role:

The student has recently commenced an MPharm programme and has been studying for one month. They have not completed much training relevant to the role of a MCA yet and have never worked in a pharmacy before.

### Training needs/gaps identified:

- Ordering, receiving, storing medicines and pharmacy stock
- Giving advice about and selling non-prescription medicines or devices to individuals safely, referring to another member of the pharmacy team where necessary
- Assisting in the provision of information to individuals on:
  - the effective use of medicines/medical devices
  - accessing and using healthcare services
  - symptoms, their own health and its management
  - services to help individuals manage conditions
  - promoting healthy lifestyles or other health needs
- Disposing of medicines and medical devices safely or advising on their safe disposal
- Carrying out checking and other quality control processes in the dispensing and supply of medicines

### Action plan for student/pre-registration trainee:

The student has minimal experience and therefore been enrolled on an approved training course.

**Date action plan to be completed by:** 3 months from the date of commencing employment

### Signatures

**Student:**

XXX

**Pharmacy professional:**
Learning needs assessment for MPharm/OSPAP student and pre-registration trainees employed as support staff

XXX

Student and pre-registration training needs assessment - example 2

Learning needs assessment for MPharm/OSPAP student and pre-registration trainees employed as support staff

Students on MPharm or OSPAP programmes and pre-registration trainees who are employed as support staff may continue to work in support staff roles without completing specific support staff training. This is because they will be participating in an educational programme recognised by us. In this case, their employer should:

- carry out an assessment of the knowledge, skills and experience of the student relevant to the role undertaken; the assessment itself should be undertaken by a registered pharmacy professional
- identify any further learning or experience required by the student to carry out the tasks within the role
- make arrangements to provide the student with any further knowledge, skills and experience, and the supervision required to work safely in their role. This may be carried out by the employer themselves ‘in-house’, or through an approved training course.

Name of the pharmacy:
Example pharmacy 2

Pharmacy professional completing the assessment (please include registration number):
Example pharmacist
Registration number: 0123456

Name of the student/pre-registration trainee:
Learning needs assessment for MPharm/OSPAP student and pre-registration trainees employed as support staff

Example third year MPharm student

**The support staff role:**
Hospital Pharmacy Support Staff

**Previous experience relevant to the support staff role:**
The student is in their third year of an MPharm programme and has nearly completed all the relevant tasks that are covered in a hospital pharmacy educational placement, therefore training will only be required in certain areas.

**Training needs/gaps identified:**
- Manufacturing and assembling medicinal products, including aseptic products

**Action plan for student/pre-registration trainee:**
The student will receive in-house aseptic training.

**Date action plan to be completed by:** Dates scheduled for training course

**Signatures**

**Student:**
XXX

**Pharmacy professional:**
XXX
Students on MPharm or OSPAP programmes and pre-registration trainees who are employed as support staff may continue to work in support staff roles without completing specific support staff training. This is because they will be participating in an educational programme recognised by us. In this case, their employer should:

- carry out an assessment of the knowledge, skills and experience of the student relevant to the role undertaken; the assessment itself should be undertaken by a registered pharmacy professional
- identify any further learning or experience required by the student to carry out the tasks within the role
- make arrangements to provide the student with any further knowledge, skills and experience, and the supervision required to work safely in their role. This may be carried out by the employer themselves ‘in-house’, or through an approved training course.

**Name of the pharmacy:**
Example pharmacy 3

**Pharmacy professional completing the assessment (please include registration number):**
Example pharmacist
Registration number: 0123456

**Name of the student/pre-registration trainee:**
Example pre-registration trainee

**The support staff role:**
Receiving prescriptions and assembling prescribed items – the trainee has secured a place on a pre-registration training programme and will work in this role before they start their pre-registration programme.

**Previous experience relevant to the support staff role:**
## Learning needs assessment for MPharm/OSPAP student and pre-registration trainees employed as support staff

The pre-registration trainee has completed all the technical aspects of this role throughout their MPharm programme and the employer’s in-house health and safety training.

<table>
<thead>
<tr>
<th>Training needs/gaps identified:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• No training needs identified</td>
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</table>

<table>
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<tr>
<th>Action plan for student/pre-registration trainee:</th>
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<tbody>
<tr>
<td>The trainee can commence employment straight away.</td>
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</tbody>
</table>

| Date action plan to be completed by: | NA |

<table>
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<tr>
<th>Signatures</th>
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</thead>
<tbody>
<tr>
<td>Student:</td>
</tr>
<tr>
<td>XXX</td>
</tr>
<tr>
<td>Pharmacy professional:</td>
</tr>
<tr>
<td>XXX</td>
</tr>
</tbody>
</table>
Appendix 2: Historic exemptions

These requirements do not apply retroactively and members of support staff who have already met our requirements do not have to do so again. This includes those who were exempted by previous iterations of these requirements from having to complete training. These are:

- Support staff who qualified prior to January 2005 and who were declared competent under the grandparenting clause to meet the knowledge and understanding associated with one or more units of the S/NVQ level 2 Pharmacy Services. The exemption applied only to those of areas of work in which the supervising pharmacist declared the Assistant competent - should the member of staff’s role or place of work have changed, additional training may be required.

- Unregistered pharmacy staff who hold one of the qualifications listed below on or before 30 June 2011.

Qualifications

- BTEC National Certificate in Pharmaceutical Sciences
- BTEC National Certificate in Science (pharmaceutical)
- BTEC National Certificate in Applied Science (pharmaceutical)
- BTEC National Certificate in Pharmacy Services
- City & Guilds of London Institute, Dispensing Technicians Certificate
- Certificate of the Society of Apothecaries
- Boots 2-year dispenser training programme completed prior to 1993
- Boots 1-year dispensing assistants’ course completed after 1993 but before 7 March 2005 plus an accredited top-up training module and assessment of competence
- Dispensing Certificate of the Royal Army Medical Corps or the Royal Air Force
- NPA 2-year Dispensing Technicians correspondence course completed prior to 1998
- NVQ level 3 Pharmacy Services (City & Guilds)
- NVQ level 3 Pharmacy Services (Edexcel)
• SANCAD Pharmacy Technicians Certificate (2 year)
• SCOTEC National Certificate in Pharmaceutical Science
• SCOTEC Pharmacy Technicians Certificate (2 year)
• SCOTVEC National Certificate in Pharmaceutical Science
• SQA National Certificate in Pharmaceutical Science
• SVQ level 3 Pharmacy Services (Scottish Qualifications Authority)