

GPhC response to the UK Government's call for evidence on the recognition of professional qualifications and regulation of professions

Introduction

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in Great Britain. Our role is to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmaceutical services in Scotland, England and Wales. We have a statutory role in relation to 'system' regulation (as we regulate registered pharmacies) as well as 'professional' regulation of individual pharmacists and pharmacy technicians. Our main work includes:

- setting standards for the education and training of pharmacists, pharmacy technicians and pharmacy support staff, and approving and accrediting their qualifications and training
- maintaining a register of pharmacists, pharmacy technicians and pharmacies
- setting the standards that pharmacy professionals must meet throughout their careers
- investigating concerns that pharmacy professionals are not meeting our standards, and taking action to restrict their ability to practise when this is necessary to protect patients and the public or to uphold public confidence in pharmacy
- setting standards for registered pharmacies which require them to provide a safe and effective service to patients
- inspecting registered pharmacies to check if they are meeting our standards.

We welcome the opportunity to respond to the UK Government's call for evidence on the recognition of professional qualifications and regulation of professions. We broadly support the Government's overarching aims to:

- ensure that the way we recognise qualifications from other countries is fair, complements the needs of the UK workforce and maintains high levels of quality and consumer protection;
- promote a regulatory environment that supports jobs, social mobility and access to professions for individuals from all backgrounds;

- ensure the regulation of professions is forward looking, adaptive and meets the needs of consumers; and
- strengthen the UK's ability to negotiate international trade agreements on recognition of qualifications.

Our response to this consultation reflects our regulatory role in protecting patients and the public, however we acknowledge that it is important for the Government to assess these issues within the wider regulatory context beyond health and social care.

We look forward to hearing the outcome of the call for evidence and in learning more from the Government as their proposals in this area develop further.

Current regulation of professions

Please tell us in which nation(s) you are a regulator of a profession

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in England, Scotland and Wales. We work collaboratively with a wide range of professionals, UK and devolved governments and regulatory and oversight bodies in Great Britain to ensure safe and effective provision of pharmacy services.

Please state the profession you regulate

We regulate pharmacists, pharmacy technicians and registered pharmacies. As part of this we set standards for pharmacy professionals and pharmacies to enter and remain on our register and we also seek assurance that pharmacy professionals and pharmacies continue to meet our standards, including by inspecting pharmacies.

Please outline the rationale for regulation within your sector

Unlike many other sectors, the primary purpose of the regulation of healthcare professionals is to ensure patient safety by protecting patients and the public from harm. Health professionals are regulated in order to ensure that they have the skills, competence, health and attitudes that command public trust and patient confidence. When healthcare professionals do not meet these standards, professional regulators must act to protect the public.

The GPhC, alongside the Pharmaceutical Society Northern Ireland (PSNI) is somewhat unique in that in addition to regulating pharmacy professionals they also regulate registered pharmacies. Our overarching role is to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmaceutical services in Scotland, England and Wales.

Health and social care has changed considerably to meet the changing needs of the population, and it will continue to change. One of our main challenges is ensuring that our regulatory function is adaptable to the pace of change. However, flexibility must be balanced with clear arrangements for accountability and proportionality. In order to hold the confidence of the public and professions, we must ourselves be open to the same principles of giving assurance and driving improvement through effective oversight of what we do and how we do it.

Please outline any evidence you have on the consumer protection impacts provided by your regulations

Our role is to protect, promote and maintain the health, safety and wellbeing of patients and the public and therefore our regulatory reach does not extend to consumers.

International recognition

Please outline your process(es) of recognising someone with an international qualification

Our processes for recognising persons with either a pharmacist or pharmacy technician qualification obtained either in Great Britain or outside GB are governed by the legislative provisions in the Pharmacy Order 2010.

The Pharmacy Order [article 20(1)(a)] specifies that for a person (P) to be entitled to be entered in Part 1 of the Register as a pharmacist or Part 2 of the Register as a pharmacy technician the Registrar must be satisfied that-

- i. P is appropriately qualified within the meaning of article 21 (or as the case may be article 22),
- ii. P's fitness to practise is not impaired,
- iii. P has the necessary knowledge of English, and
- iv. where necessary P meets such additional requirements (if any) relating to education training or experience as the Registrar considers are appropriate to P's case;

In connection with its general function under article 4(3)(e), in so far as that function relates to the education, training and acquisition of experience of registrants and prospective registrants, the Council must:

- a. except in the case of persons who are appropriately qualified by virtue of article 21(1)(b) or 22(1)(b), 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 or 2 of the Register as a pharmacist or, as the case may be, a pharmacy technician; and
- b. set—
 - i. the standards of education, training and experience that providers of education and training must meet in order to enable a person undertaking such education or training, or acquiring such experience, to achieve the standards referred to in sub-paragraph (a) having regard, in particular, to the outcomes to be achieved, and
 - ii. any requirements to be satisfied for admission to, and continued participation in, education and training for prospective pharmacists or prospective pharmacy technicians, which may include requirements as to fitness to practise unimpaired by health.

In relation to pharmacists what constitutes being 'appropriately qualified' is set out in article 21 of the Pharmacy Order.

The different ways in which pharmacist applicants can be regarded as being 'appropriately qualified' and therefore their respective routes to the register with details of the education, training and experience

requirements needed to register as a pharmacist in Great Britain are set out in the criteria for registration as a pharmacist available on our website¹.

Article 21 (1)(a) – covers applicants who have qualifications awarded in Great Britain. These qualifications are approved by the Council following our procedures for the accreditation of courses that lead to registration as a pharmacist. The standard route to registration for an applicant who has studied in Great Britain is

- completion of a 4 year GPhC accredited MPharm degree,
- successful completion of 52 weeks of pre-registration training and meeting all performance competences
- successful pass at the GPhC's registration assessment

Successful completion of all 3 stages demonstrates that the applicant has met the standard of proficiency for the safe and effective practice of pharmacy and can apply to be registered in Part 1 of the register.

The standards of initial education and training for pharmacists set out the criteria against which we will approve UK education and training for student pharmacists and pre-registration trainee pharmacists. The standards ensure that newly registered pharmacists are competent to practise safely and effectively.

The full version of these standards are available on our website².

Article 21(1)(b) – covers applicants who have rights under Directive 2005/36/EC (the Directive) to automatic recognition of their qualifications. These qualifications are set out in the Approved European Qualifications Order of Council 2010 approved by the Privy Council.

Article 21(1)(c) and 21(1)(d)(ii)(aa) covers applicants with either General Systems rights under the Directive or EU Treaty rights.

Full details of how to make an application as an EEA qualified pharmacist, with details of the documents required to complete an application and the form and manner in which they are to be provided is available on our website³.

We confirm an applicant's qualification and decide whether the applicant is eligible for automatic recognition under the Directive or not. General Systems applicants or those with EU Treaty rights may be required to complete a compensation measure covering theoretical knowledge and practical skills, which have not been covered as part of their education and training, in order to meet our standards for safe and effective practice as a pharmacist.

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https://www.pharmacyregulation.org/sites/default/files/Registration%20criteria%20for%20pharmacists%20September%202012_0.pdf

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https://www.pharmacyregulation.org/sites/default/files/document/future_pharmacists_standards_for_the_initial_education_and_training_of_pharmacists.pdf

³ <https://www.pharmacyregulation.org/registration/registering-pharmacist/eea-qualified-pharmacists>

Article 21(1)(d)(i) - covers applicants who qualified and registered as pharmacists in Northern Ireland [the GPhC accredits MPharm degrees awarded by Queens University Belfast and the University of Ulster jointly with the Pharmaceutical Society of Northern Ireland. Applicants would also need to have completed 52 weeks of pre-registration training and the registration assessment in NI in order to register with PSNI]

Full details of how to make an application as pharmacist qualified in Northern Ireland, with details of the documents required to complete an application and the form and manner in which they are to be provided is available on our website⁴

Article 21(1)(d)(ii)(bb) – covers all other international (non-EEA) qualified pharmacist applicants who are required to undertake additional education, training or experience. The additional education, training or experience consists of:

- a 1 year 120 credit master's level post graduate diploma (The Overseas Assessment Programme (OSPAP) is accredited by the GPhC and provided by 4 Schools of Pharmacy. The course is designed to ensure that on completion the international applicant meets the same M-level outcomes as a UK MPharm graduate
- successful completion of 52 weeks of pre-registration training meeting the same performance competences as MPharm graduates
- successful pass at the GPhC's registration assessment

Successful completion of all 3 stages demonstrates that the applicant has met the standard of proficiency for the safe and effective practice of pharmacy and can be registered in Part 1 of the register.

Standards for the education and training of all international non-EEA pharmacists set out the criteria against which we will approve education and training for non-EEA pharmacists who want to register in Great Britain. The standards ensure that pharmacists from outside of the EEA are competent to practise safely and effectively. The full version of these standards are available on our website.

This additional education, training or experience was designed so that when added to the individual's existing overseas qualification and training the individual would have a total qualification length in line with the minimum training requirements of article 44 of Directive 2005/36/EC as required by Article 21(2) of the Pharmacy Order.

Full details of how to make an application for the OSPAP, with details of the documents required to complete an application and the form and manner in which they are to be provided is available on our website⁵.

The international route is similar to the UK route in that both academic qualifications, the MPharm degree and the OSPAP must be accredited by the GPhC. Both routes then require applicants to successfully complete the same preregistration training scheme which consists of meeting all of the pre-registration training competences and successfully passing the same registration assessment before

⁴ <https://www.pharmacyregulation.org/registration/registering-pharmacist/uk-recognised-pharmacist-qualifications>

⁵ <https://www.pharmacyregulation.org/registration/registering-pharmacist/overseas-non-eea-qualified-pharmacists>

being eligible to make an application to register. Full details of the pre-registration training scheme and the pre-registration manual are available on our website⁶.

In the case of European qualified pharmacist applicants who fall under the General Systems route to recognition, where the comparative assessment of their qualifications and work experience indicates that a compensation measure is required the compensation measure we require is based on the successfully completing a period of pre-registration training under the same terms and conditions as UK and international applicants to address any gaps in their knowledge and experience.

The rationale for doing this is that on completion of the respective UK, International or General Systems compensation route we can be assured that applicants to Part 1 of our register have demonstrated that they meet the standard of proficiency for the safe and effective practice of pharmacy set by our Council.

Therefore currently the only persons who are not required to demonstrate that they meet our standards for the safe and effective practice of pharmacy before they are entitled to register are persons whose qualifications are set out in the Approved European Qualifications Order of Council 2010 approved by the Privy Council.

In relation to pharmacy technicians what constitutes being ‘appropriately qualified’ is set out in article 22 of the Pharmacy Order.

The different ways in which pharmacy technician applicants can be regarded as being ‘appropriately qualified’ and therefore their respective routes to the register with details of the education, training and experience requirements needed to register as a pharmacy technician in Great Britain are set out in the criteria for registration for pharmacy technicians available on our website⁷.

Article 22 (1)(a) – covers applicants who have qualifications awarded in Great Britain. These qualifications are approved by the Council following our procedures for the accreditation of courses that lead to registration as a pharmacy technician. The standard route to registration for an applicant who has studied in Great Britain is to complete both competency-based and knowledge-based qualifications and provide evidence that they have also completed a minimum of two years’ relevant work-based experience in the UK under the supervision, direction or guidance of a pharmacist or pharmacy technician to whom the applicant was directly accountable for not less than 14 hours per week.

Successful completion of these requirements demonstrates that the applicant has met the standard of proficiency for the safe and effective practice of pharmacy and can apply to be registered in Part 2 of the register.

Standards of initial education and training for pharmacy technicians set out the criteria against which we approve education and training for pre-registration trainee pharmacy technicians. The standards ensure that newly registered pharmacy technicians are competent to practise safely and effectively. The full version of these standards is available on our website⁸.

⁶ <https://www.pharmacyregulation.org/education/pharmacist-pre-registration-training-scheme>

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[https://www.pharmacyregulation.org/sites/default/files/document/criteria for registration as a pharmacy technician in great britain september 2019.pdf](https://www.pharmacyregulation.org/sites/default/files/document/criteria%20for%20registration%20as%20a%20pharmacy%20technician%20in%20great%20britain%20september%202019.pdf)

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[https://www.pharmacyregulation.org/sites/default/files/standards for the initial education and training of pharmacy technicians october 2017.pdf](https://www.pharmacyregulation.org/sites/default/files/standards%20for%20the%20initial%20education%20and%20training%20of%20pharmacy%20technicians%20october%202017.pdf)

Article 22(1)(b) and 22(1)(c)(ii)(aa) – covers applicants with either General Systems rights under the Directive or EU Treaty rights

Full details of how to make an application as an EEA qualified pharmacy technician, with details of the documents required to complete an application and the form and manner in which they are to be provided is available on our website⁹.

We evaluate an applicant's education and training and decide whether the applicant is eligible for registration or not. Applicants may be required to complete a compensation measure covering theoretical knowledge and practical skills, which have not been covered as part of their education and training, in order to meet our standards for safe and effective practice as a pharmacy technician.

Article 22(1)(c)(ii)(bb) – covers all other international qualified pharmacy technician applicants who are required to undertake additional education, training or experience. The additional education, training or experience consists of completing both the knowledge and competency level 3 qualifications.

Full details of the documents all prospective pharmacist and pharmacy technician applicants must provide with their application for registration is set out in the Rule 10 of the General Pharmaceutical Council (Registration Rules) Order [SI 2010/1617]

There are also other relevant education and training provisions in articles 42, 44, 45, 46 and 47 of the Pharmacy Order.

International route for internationally qualified pharmacy technicians wishing to register and practise as pharmacy technicians in GB must complete the same GPhC recognised Pharmacy technician qualification(s) before they can make an application to register. The criteria for registration as a pharmacy technician listing the qualifications and providers is available on the website.

We have no Mutual Recognition Agreements with any other country other than the provisions provided by the Mutual Recognition of Professional Qualifications Directive.

Please outline any additional steps and their resource implications that you face in processing applicants with international qualifications

Currently for European qualified applicants we usually receive documents such as certificates of compliance and certificates of current professional status direct from the relevant institutions through the EC Internal Market Information (IMI) system and can check authenticity and seek clarification directly from the relevant competent authority in the applicant's home state. This greatly simplifies the process which is reflected in the fees applicants are required to pay.

In the case of other international qualified applicants, we receive applications from countries all over the world. The application guidance sets out the form and manner in which documents in support of an application must be submitted. Applicants can submit a number of documents themselves while others namely the certificate of current professional standing (CCPS), academic transcripts and references must be sent direct to the GPhC by the appropriate authorities. Documents in support of an application are collated in the office. We contact the awarding institutions and the regulatory body directly if we need to check details provided to us either by them or the applicant themselves. We also check with UKNARIC

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https://www.pharmacyregulation.org/sites/default/files/document/pharmacy_technician_registration_eea.pdf

to confirm the status of the awarding institution and how the qualification compares to UK qualifications and also confirm applicants' English language scores on the providers test verification website. We use the CCPS to confirm not only that the applicant is eligible to practise as a pharmacy professional but also to check whether the applicant is subject to any fitness to practise sanctions or proceedings which could prevent them from exercising their profession. The applicant is required to provide a CCPS from the country of their qualification and also from any other jurisdiction in which they have practised within the last 5 years preceding their application to the GPhC.

The checks we carry out are resource intensive and reflected in the higher fee paid by these applicants. The checks provide us with the necessary assurance that the applicant is who they claim to be and holds a legitimate pharmacy qualification that entitles them to practise as either a pharmacist or pharmacy technician in the jurisdiction in which the qualification was obtained.

With reference to any of the additional steps outlined above, what would you suggest are the priorities for the UK Government in considering future ways to recognise international qualifications? Please include any details on what an ideal system could look like, as well as how it could operate. Please consider what the priorities would be for the profession you regulate

A priority for the UK Government in considering future ways to recognise international qualification is to ensure that for us, as a healthcare regulator whose primary objective is the protection of the public, our processes for recognising international qualifications must continue to include our ability to:

- Confirm that the qualification held by an applicant does indeed allow the person to practise their profession in the country in which the qualification was obtained.
- Confirm the educational standard of that qualification when compared to our UK qualifications using the services of UKNARIC.
- Ensure an applicant's current competence to practise the profession and by means of additional education, training or experience including relevant assessments confirm that an applicant meets the standards we have set for safe and effective practice of the profession and entry to the relevant part of our register.

Once we have determined that an applicant is appropriately qualified we must continue to be able to assure ourselves that:

- applicants meet our fitness to practise requirements and prior to registration that their fitness to practise is not impaired; and
- applicants have the necessary English language skills for the safe and effective practice of pharmacy

Do you require legislation to give you powers to make changes to your international recognition routes?

The Pharmacy Order as drafted already provides a degree of flexibility to make changes to our recognition policies for internationally qualified pharmacy professionals. We have had discussions with DHSC on changes to relevant articles in the Pharmacy Order to ensure maximum flexibility in developing a more proportionate yet robust approach to assuring ourselves that internationally qualified applicants meet our standards of proficiency for the safe and effective practice of pharmacy and to assure ourselves of their current competence to practice as a pharmacy professional.

Our current standards for initial education and training of pharmacists form the basis of our current standards for the initial education and training of international (non-EEA) pharmacists wanting to register in GB as the learning outcomes for both the MPharm degree and the OSPAP programme are the same. Both documents were published in May 2011 and are currently being reviewed.

In January 2019, we published a consultation about revising the initial education and training standards for pharmacists. This proposed a revised set of learning outcomes and closer integration of academic study (the MPharm degree) and learning in practice (the 52 weeks of pre-registration training year). This model requires universities, employers and statutory education bodies working more closely in the fifth year of training. Although work was put on hold temporarily in March due to the pandemic, the aim is for these standards to be agreed by Council in November. Once agreed work will begin on aligning the standards for initial education and training for international pharmacists with the revised pharmacist learning outcomes.

What level of dialogue do you maintain with your international counterparts? Please outline the benefits and challenges to cooperation

We contact international regulators on an ad hoc basis to verify information they or the applicant have provided. Queries are usually raised by e-mail.

In the case of EEA nationals with EEA qualifications we use the European Commission's Internal Market Information System (IMI) for the following:

- to exchange of fitness to practise information via the 'Alert mechanism'
- to process European Professional Card (EPC) applications for pharmacists for establishment or temporary and occasional (T&O) service provision
- to receive /send certificates of current professional status, certificates of compliance with Directive requirements and to raise questions with the issuing EEA competent authority on documents received

What are your priorities for supporting UK professionals on your register to have access to their profession in other countries? Please outline any Government support that would help

A priority for us in supporting a pharmacy professional currently registered with us who wishes to practise as a pharmacist or pharmacy technician in another country is to provide them with an accurate certificate of current professional status (CCPS), sometimes known as a 'letter of good standing', which confirms that the professional has met our registration criteria and provides information about their registration with us.

The CCPS will include the professional's:

- full name
- registered address
- date of birth
- details of their pharmacy education
- their current registration status

- details of any current and past fitness to practise matters

The CCPS may therefore include information which is not in the public domain.

Further information about the CCPS and how to apply for one is available on our website¹⁰

Do you have any provisions for the recognition of professional qualifications held by refugees residing in the UK? If yes, please detail what these are and why you have implemented these provisions. If no, please detail why not

Refugees who apply to us are often supported by a recognised refugee agency or charity. In such cases we can waive the application fee for the OSPAP eligibility application. Also, our OSPAP application allows individuals, most often those who have had to flee their country of qualification, unable to provide documents such as academic transcripts or letters of good standing direct from the relevant authorities in their home country to still make an application. Such applicants are required to provide as much evidence and documentation as they possibly can themselves together with a self-assessment of how the qualification they studied compares to the UK MPharm degree. Their assessment and all relevant documentation in support of this is sent to the OSPAP provider of their choice for the provider to assess whether the applicant is eligible to start the OSPAP course.

Developing Professional Standards and Regulation

Please describe the process by which UK professionals gain qualifications to enter the profession, including detail on the types of education and training they must undergo and how long it takes to complete them

Our Education and training processes are governed by Part 5 of the Pharmacy Order and in particular Articles 42 and 44.

Article 42 requires our Council to set

- the standards of proficiency for the safe and effective practice of pharmacy that prospective pharmacists and pharmacy technicians must meet in order to be registered
- the standards that providers of education and training must meet to ensure that persons can meet the standards of proficiency above and
- the requirements to be satisfied for admission and continued participation in education and training which may include requirements as to students' fitness to practise.

The standards for pharmacists¹¹ and pharmacy technicians¹² are set out in the pharmacist initial education and training requirements on our website.

¹⁰ <https://www.pharmacyregulation.org/registration/working-abroad>

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https://www.pharmacyregulation.org/sites/default/files/document/future_pharmacists_standards_for_the_initial_education_and_training_of_pharmacists.pdf

¹²

https://www.pharmacyregulation.org/sites/default/files/standards_for_the_initial_education_and_training_of_pharmacy_technicians_october_2017.pdf

For persons wishing to register as pharmacists these individuals are required to complete:

- a 4 year Masters of Pharmacy MPharm qualification at one of the UK's University Schools of Pharmacy accredited by the GPhC to provide this degree. The list of GPhC accredited MPharm degrees, 2+2 MPharm courses, taught in part overseas and an accredited foundation degree programme are available on our website¹³
- Successful completion of the degree is then followed by a 52 week programme of pre-registration training which requires trainees to follow the GPhC pre-registration training scheme. Details of the pre-registration training scheme is available on our website¹⁴.
- On obtaining a successful 39week tutor appraisal indicating satisfactory progress towards meeting all of the required scheme competences, the trainee is eligible to sit the GPhC registration assessment no earlier than at the 45week stage of pre-registration training. Details of the registration assessment are available on our website¹⁵.

Full details of the requirements UK qualified pharmacists must complete in order to be eligible to register are available in the criteria for registration as a pharmacist on our website.

Persons wishing to register as pharmacy technicians must have completed the following:

- an approved qualification(s) listed as an eligible qualification(s) on the GPhC's website and
- completed a minimum of two years' relevant work-based experience in the UK under the supervision, direction or guidance of a pharmacist or pharmacy technician to whom the applicant was directly accountable for not less than 14 hours per week. A pre-registration trainee pharmacy technician must commence or register for the required qualifications (set out on the Approved pharmacy technician courses page in the 'Education' section of the GPhC website) within three months of commencing contracted, relevant work experience.

Full details of the requirements UK qualified pharmacy technicians must complete in order to be eligible to register are available in the criteria for registration as a pharmacy technician on our website.

Please describe the process you offer for professionals who have gained the relevant UK qualifications to be brought onto your register

Pharmacist applicants who have completed all the education and training requirements in the UK and satisfy all the criteria for registration as a pharmacist are available on our website¹⁶. They can make an online application to register and submit hard copies of all the required supporting identity and qualification documents as set out in Rule 10 of the General Pharmaceutical Council (Registration Rules) Order of Council 2010 SI 2010/1617 (The Registration Rules)

¹³ <https://www.pharmacyregulation.org/approved-providers-education-and-training>

¹⁴ <https://www.pharmacyregulation.org/education/pharmacist-pre-registration-training-scheme>

¹⁵ <https://www.pharmacyregulation.org/education/pharmacist-pre-registration-training-scheme/registration-assessment>

¹⁶

https://www.pharmacyregulation.org/sites/default/files/Registration%20criteria%20for%20pharmacists%20September%202012_0.pdf

Pharmacy technician applicants who have completed all the education and training requirements in the UK and satisfy all the criteria for registration as a pharmacy technician available on our website¹⁷. They can make an online application to register and submit hard copies of all the required supporting identity and qualification documents as set out in Rule 10 of The Registration Rules

As well as education and training requirements, the registration process also includes checks on the applicants' health, character, knowledge of English language, and identity. The required checks are set out in Rule 10 of The Registration Rules.

All applicants must satisfy our English language requirements as set out in our guidance on evidence of English language skills available on our website¹⁸

However, UK qualified applicants wishing to register as a pharmacist must have completed:

- a GPhC accredited Master of Pharmacy degree from a university within the UK and
- pre-registration training and the registration assessment within the UK

Similarly a UK qualified applicant wishing to register as a pharmacy technician having completed an approved knowledge and competency qualification in the UK while working under the supervision, direction or guidance of a registered pharmacist in Great Britain, Northern Ireland, the Channel Islands or the Isle of Man, will in most cases automatically satisfy us that they meet the English language requirements for registration.

The health and character checks we complete are by means of an applicant's self-declaration which requires the applicant to answer 'Yes' or 'No' to the following questions.

- Has a determination ever been made against you by a regulatory body in the United Kingdom responsible under any enactment for the regulation of a health or social care profession to the effect that your fitness to practise as a member of a profession regulated by that body is impaired, or a determination by a regulatory body elsewhere to the same effect?
- Do you currently have any problems with your physical or mental health that may impair your ability to practise safely and effectively or which otherwise impairs your ability to carry out your duties in a safe and effective manner?
- Have you previously been convicted or cautioned for a criminal offence in the British Islands or elsewhere (which, if committed in England, Scotland or Wales would constitute a criminal offence) or have you previously agreed to be bound over to keep the peace by a Magistrates' Court in England or Wales? (Road Traffic offences in which the person committing the offence has been offered the option of paying a fixed penalty (e.g. certain speeding offences etc) will not be treated as a conviction and need not be declared).
- Have you previously agreed to pay a penalty under section 115A of the Social Security Administration Act 1992 (penalty as alternative to prosecution)?

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[https://www.pharmacyregulation.org/sites/default/files/document/criteria for registration as a pharmacy technician in great britain september 2019.pdf](https://www.pharmacyregulation.org/sites/default/files/document/criteria%20for%20registration%20as%20a%20pharmacy%20technician%20in%20great%20britain%20september%202019.pdf)

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[https://www.pharmacyregulation.org/sites/default/files/document/guidance on evidence of english language skills september 2016.pdf](https://www.pharmacyregulation.org/sites/default/files/document/guidance%20on%20evidence%20of%20english%20language%20skills%20september%202016.pdf)

- Are you currently, or have you ever been, under investigation by any regulatory body (other than the GPhC) or criminal enforcement authority (e.g. police or NHS Counter Fraud Service) in the British Islands or elsewhere?
- Have you previously accepted a conditional offer under section 302 of the Criminal Procedure (Scotland) Act 1995 (fixed penalty: conditional offer by procurator fiscal) or have you previously been subject to an order under section 246(2) or (3) of the Criminal Procedure (Scotland) Act 1995 discharging you absolutely (admonition and absolute discharge)?
- Have you previously been included by the Independent Safeguarding Authority (also known as the Independent Barring Board) in the barred list (in England, Wales or Northern Ireland) or the children’s list or adult’s list maintained by the Scottish Ministers?
- Are you currently, or have you ever been the subject of fitness to practise proceedings from your academic institution or the subject of disciplinary proceedings during any training placement or employment that resulted in a sanction of suspension or dismissal in the British Islands or elsewhere?

Where an applicant answers ‘Yes’ to any question they are required to complete a ‘Something to declare’ form. The matter declared together with any additional information the applicant has provided is fully assessed to determine whether the applicant is fit to practise and can be permitted to enter the register. In some cases where after thorough assessment a decision is taken that the fitness to practise matter disclosed is incompatible with registration the applicant’s application for registration is refused. A reasoned notice of decision to refuse registration is sent to the applicant and the applicant informed of their right to appeal that decision to the Appeals Committee¹⁹.

Additionally, applicants are required to declare that they will:

- have appropriate indemnity arrangements in place before they start to practise as a pharmacy professional
- meet our standards for pharmacy professionals and our revalidation requirements and submit their revalidation record for review annually when they renew their registration.

How often do you review your processes and standards? In your answer, please describe both formal and informal ways this is carried out (e.g. via consultancy, membership surveys) and include detail of any changes you have recently made based to this process

We review our processes on a regular basis. As part of our commitment to good practice, our consultations are based on the Cabinet Office Consultation principles guidance. This guidance helps us to decide when, with whom and how to consult.

Our statutory consultations are normally carried out for a period of 12 weeks. We often use a combination of formal and informal engagement, including online surveys, one-to-one meetings with key stakeholders, and focus groups with patients and the public.

The consultation process involves three distinct stages:

¹⁹ Details of how to make an appeal is also available on our website

<https://www.pharmacyregulation.org/decisions-about-your-application-or-registration>

- pre-consultation work (planning, testing, policy development)
- launch and running of the consultation (press release, live survey, engagement events)
- post-consultation work (analysis, reporting, publication, and follow-up work)

Pharmacist initial education and training requirements were the subject of extensive pre-consultation engagement work and then formal 12-week consultation which was reported to Council. Implementation engagement is ongoing.

Pharmacy technician initial education and training requirements again were reviewed following a similar pattern of extensive pre-consultation engagement work and then 12-week formal consultation reported to Council. Implementation work with these standards is complete and the new standards were published in October 2017.

Thinking about key changes that have been made to your qualification processes, what has been the cause for this change?

We review the qualifications we accredit on a regular basis. This includes extensive consultation with the professionals we regulate, education and training providers and users of pharmacy services. On that basis we are confident that pharmacy qualifications are fit for purpose.

One significant change we have made since March 2020 is the provisional registration of pharmacist pre-registration trainees as pharmacists, to ensure that pharmacies can deliver pharmacy services at a difficult time. This was in response to feedback from employers and discussions internally and with our Council. The purpose of this significant change in policy is, of course, the covid-19 pandemic but it does demonstrate that we can regulate flexibly and at pace as required.

Do you feel that the current standards you set, against which applicants are assessed to enter onto the register, are a fair reflection of the level of skill, training, education, and experience required to practise their profession? Please explain your answer

The Pharmacy Order 2010 requires us to consult with all relevant stakeholders when setting standards and an indicative list of consultees is included in the legislation. Our public consultations show that we reach out to stakeholders as required to ensure that all views are taken into account as we develop our standards.

Please detail any changes that you are considering for your sector to ensure the profession you regulate stays relevant to current challenges. Does current regulation allow for you to make these changes?

The Pharmacy Order 2010 allows us to make changes to initial education and training requirements, subject to appropriate consultation with stakeholders.

Our 2017 education and training standards for pharmacy technicians have been implemented and we will review their implementation once courses based on them have been delivered.

We hope to agree new standards for the initial education and training of pharmacists in late 2020, after a comprehensive national consultation in 2019. The delay is, mainly, due to the covid-19 pandemic.

The pharmacist profession is changing and our standards reflect this. Pharmacist independent prescribing is something we hope to introduce into initial education and training, subject to appropriate clinical experience being in place to allow this.

Please detail any principles of regulation you follow (e.g. proportionality and transparency) and how you uphold them, and whether they support you in your duties as a regulator.

Our strategic plan²⁰ for the next five years marks the start of our journey towards delivering our Vision 2030, for 'safe and effective pharmacy care at the heart of healthier communities'. To make major progress in delivering our vision over the next five years, we will focus on achieving the five strategic aims set out below. These are to:

- Deliver an adaptable standards framework that meets public and professional needs that are changing quickly
- Deliver effective, consistent and fair regulation
- Drive improvements in pharmacy care by modernising how we regulate education and training
- Shift the balance towards more anticipatory, proportionate and tailored approaches to regulating pharmacy
- Enhance our capabilities and infrastructure to deliver our vision.

Alongside this, our operating principles underpin the way we work. These are to:

Promote professionalism

We believe the professional knowledge, attitudes and behaviours of the people working in pharmacy offer the best assurance to people using pharmacy services. Our most effective role is in helping to promote an environment in which professionalism can flourish, and making sure that the standards expected of pharmacy reflect this.

Be person-centred

At the heart of everything we do is the recognition that everyone is an individual and has differing needs which we must understand and take account of in our work. This applies to everyone – including people using pharmacy services, people working in pharmacy, people working in the wider health and care sector and people in our own organisation.

Focus on outcomes

We will continue to focus on the outcomes we want to achieve on behalf of the people using pharmacy services. This will mean we can give the people working in pharmacy the flexibility to innovate and adapt in a way that improves quality

²⁰ <https://www.pharmacyregulation.org/sites/default/files/document/gphc-strategic-plan-2020-25.pdf>

Promote learning and improvement

We will work to continuously improve the quality of pharmacy. We will collect information from our work, and the work of others, so that we can share learning and promote improvement. And we will make sure that we also improve ourselves and work in the most efficient and effective ways.

Collaborate

We are one part of a wider system that makes sure people receive safe and effective care from pharmacy and ensures that public trust in pharmacy is maintained. If we are to be successful, we must work alongside the people using pharmacy, the leaders of pharmacy, other regulators, and the wider health and care sector.

Recognise the contribution of the whole pharmacy team

People receive safe and effective care when the skills, knowledge and contributions of everyone in the pharmacy team are used to their best effect. We will work in a way that recognises the whole pharmacy team's role in quality and improvement.

Please detail any requirements you may place on the professionals you regulate and why they are necessary. If you do not impose any requirements, please justify your reasons for not doing so.

The GPhC has a statutory responsibility to provide standards and guidance to pharmacy professionals. Our standards for pharmacy professionals describe how safe and effective care is delivered through 'person-centred' professionalism. The standards are a statement of what people expect from pharmacy professionals, and also reflect what pharmacy professionals have told us they expect of themselves and their colleagues.

There are nine standards²¹ that every pharmacy professional is accountable for meeting. The standards apply to all pharmacists and pharmacy technicians. The standards need to be met at all times, not only during working hours.

The standards for pharmacy professionals are relevant to all pharmacy students and trainees while they are on their journey towards registration and practice. The standards explain the knowledge, attitudes and behaviours that will be expected of students and trainees if they apply to join the register. They should be interpreted in the context of education and training and used as a tool to prepare students and trainees for registration as a pharmacy professional. Pharmacy students and trainees should consider the standards as they move closer to registration and professional practice, and should read them alongside other relevant documents that are provided by initial education and training providers.

The standards are designed to reflect what it means to be a pharmacy professional. They are also at the heart of initial education and training, registration and renewal as a pharmacy professional, and continuing fitness to remain registered.

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https://www.pharmacyregulation.org/sites/default/files/standards_for_pharmacy_professionals_may_2017_0.pdf

Please describe the process by which you determine your application fees. Please set out any principles or guidelines you adhere to when determining fee amounts

Our powers to charge fees and change the level of fees for registrants and registered pharmacies come from our governing legislation, the Pharmacy Order 2010. We set out fees in line with our fees policy which is underpinned by The General Pharmaceutical Council (Registration and Renewal Fees) (Amendment) Rules. We review our fees on an annual basis. If we want to change our fees, the law says we must consult with the people and organisations that pay them.

To work out the costs, we use a 'cost allocation model'. The model allocates spending by – firstly – our statutory roles. These are:

- education
- standard setting
- registration
- inspection
- fitness to practise

The cost allocation model makes it clear how much our individual activities cost, and provides a framework for discussions about the setting of fees. We review and refine the model from time to time, to make sure it is complete and accurate.

The fees we charge applicants are set out in our Fees Rules and are based on a cost recovery basis. Education fees which are charged under article 65 of the Pharmacy Order were last reviewed in 2012 and are due for review.

Current costs per application to international applicants

Table 1: Fees paid to GPhC

Title	Overseas Pharmacists	Overseas Pharmacy Technicians
Overseas Pharmacists' Assessment Programme (OSPAP) eligibility app fee Content	£687 (art 65)	N/A
Overseas scrutiny fee	N/A	£45 (Fees rules)
Pre-reg training fee	£142 (art 65)	N/A
Registration assessment fee	£182 (art 65)	N/A
Application for entry	£106 (Fees rules)	£106 (Fees rules)
Entry fee	£257 (Fees rules)	£121 (Fees rules)
Total to GPhC	£1,374	£272

Table 2: Fees paid to course providers

Title	Overseas Pharmacists	Overseas Pharmacy Technicians
OSPAP costs	Range from £11,700 to £13,500	N/A
UK Pharmacy technician course cost	N/A	Approx. £3,500

Current costs per application to EEA applicants

Table 3: Fees paid to GPhC

Title	EEA Pharmacists	EEA Pharmacy Technicians
Initial scrutiny	£109 (Fees rules)	N/A
General Systems Assessment	£391 (Fees rules)	£201 (Fees rules)
Adaptation training (pre-reg training)	£142 (art 65)	N/A
Application for entry	£106 (Fees rules)	£106 (Fees rules)
Entry fee	£257 (Fees rules)	£121 (Fees rules)
Total to GPhC	£1,005	£428

Table 4: Fees paid to course providers

Title	EEA Pharmacists	EEA Pharmacy technicians
Individual distance learning modules	Up to individual module/distance learning providers	Up to individual module/distance learning providers

Please detail any changes that you are considering for your sector to ensure the profession you regulate stays relevant to current challenges. Does current regulation allow for you to make these changes?

Our statutory role and regulatory focus is to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmaceutical services in Scotland, England and Wales. However, we recognise that regulation must be more than enshrining and enforcing minimum standards and we are actively working to drive improvements in pharmacy care by modernising how we regulate.

We aim to make sure that all aspects of how we regulate the education and training of pharmacy professionals, and their ongoing learning and development, are up to date and working effectively together. Through this we will be better able to support the shaping of confident and capable professionals that can meet patients' needs now and in the future.

Introducing provisional registration in response to the Covid-19 pandemic is an example of how we have stayed relevant to current challenges. We were able to quickly and efficiently amend our criteria to

allow pre-registration trainees who have been unable to sit the registration assessment and who meet specific requirements to be provisionally entered onto the register.

In our Strategic Plan 2020-25 we outline what our programme of work will focus on. This includes:

- Refreshing standards for the initial education and training of pharmacists and pharmacy technicians.
- Developing our approach to regulating the post-registration education and training of pharmacy professionals.
- Implementing a tailored and intelligence-led approach to accrediting and quality assuring initial education and training providers.
- Operating a more person centred and restorative approach to fitness to practise.
- Developing a more strategic approach to regulating pharmacy.
- Raising the public's awareness and understanding of the standards they should expect from pharmacy.
- Developing new regulatory standards for updated roles in medicines legislation.

We recognise that the system and environment in which healthcare is delivered should be optimally designed and governed and act as enablers for professionals to deliver good quality care. As set out in our response²² to the government's consultation on reforming regulation we believe that the legal framework governing the UK's health professions regulatory bodies needs reform. This will help make sure that the delivery of a pharmacy workforce, pharmacy premises and services are fit for the future.

Continuous Professional Development

Please detail any continuous professional development that is required for professionals to remain on your register. Please include detail on how often this should take place, in what form, as well as the benefits of adhering and consequences of not adhering to these

In 2018, the GPhC replaced the requirement for registrants to complete continuing professional development (CPD) with an updated revalidation framework²³. The framework encourages pharmacy professionals to reflect on their learning and practice, and it focuses on the outcomes for the people using the services of pharmacy professionals to provide that assurance.

Pharmacy professionals are required to carry out, record and submit:

- four CPD records, at least two of which must be planned learning activities
- one peer discussion

²²

https://www.pharmacyregulation.org/sites/default/files/document/gphc_response_to_promoting_professionalism_reforming_regulation.pdf

²³

https://www.pharmacyregulation.org/sites/default/files/document/gphc_revalidation_framework_january_2018.pdf

- one reflective account

Each time a pharmacy professional is required to renew their registration they need to submit records of these activities which they've carried out over the previous year, to meet the revalidation requirements.

In response to the Covid-19 pandemic, we changed our revalidation requirements because of the challenges and pressures on pharmacy professionals. Pharmacists and pharmacy technicians who have a registration renewal deadline between 1 September and 31 December 2020 will only need to submit a reflective account when they renew their registration and do not need to submit a peer discussion record or any planned or unplanned CPD records.

Diversity and Inclusion

Do you collect data on the diversity of both your UK and international applications? For example, on gender or ethnic background

We aim to ensure equality, diversity and inclusion (EDI) in all our work with:

- patients and the public
- people aspiring to become pharmacy professionals and those responsible for their education and development
- pharmacy professionals on our register
- pharmacies
- our own staff and associates

As part of this commitment, we routinely collect diversity data for all registrants including those who apply to register with us. Our registration procedures give both our UK and international applicants the option to fill out an equality monitoring form which includes information on gender and ethnic background. These are stored confidentially on our Customer Relationship Management (CRM) system for monitoring and evaluation purposes.

Please outline any steps you take to eliminate unconscious bias from your recognition process

We take a broad view of equality by using our regulatory role, particularly in the development of standards, to influence the promotion and development of equity action more widely. The GPhC believes that the promotion of EDI is important in combating injustice against those who share any of the protected characteristics under the Equality Act 2010.

To meet this goal more broadly we have carried out training on:

- disability awareness for staff
- unconscious bias for associates and partners
- our responsibilities under the Equality and Human Rights Acts, for managers and heads of functions

- mental-health first aid for a second group of interested staff (which now gives us a total of 14 mental-health first aiders)

This coming year we are planning to review and update our strategic approach to equality, diversity and inclusion, looking across all our regulatory work (not only Fitness to Practise) to see what further opportunities there are to use regulation actively to promote this agenda, as well as continuing to eliminate any scope for discriminatory decision-making. We expect this review to include building our understanding of what the data are telling us and to look at practical measures such as the role of inspection in promoting equality and eliminating discrimination in pharmacy services, as well as considering the possibility of extending anonymised decision-making within the GPhC.

Please outline any steps you take to support job creation in the profession you regulate

As the regulator for pharmacy professionals and registered pharmacies, we do not have any direct involvement in job creation as it falls outside of our statutory remit. However, the work that we do in relation to standard setting and in developing and refining our established procedures helps support the delivery of person-centred care professionalism in the professions we regulate. This helps to provide assurances that pharmacists and pharmacy technicians receive the right education and training to prepare them to provide safe and effective care from their first day on the job.

Please outline any steps you take to attract a diverse workforce to the profession you regulate

Our clear aim is to build equality, diversity and inclusion (EDI) into everything we do. As a responsive organisation, we believe that a diverse workforce that represents the wider public is linked to better patient outcomes. We have looked at a number of equality areas in recent years to identify any gaps or barriers that can impact on the creation of a diverse workforce. These are set out below.

Seminar on understanding issues relating to ethnicity and pharmacy education and training

We held a seminar in 2016 on issues relating to ethnicity and pharmacy education and training. This was to supplement the research²⁴ we commissioned on the performance of Black African candidates in the registration assessment in 2013, 2014 and 2015. The report discusses a number of factors that may influence the experience and performance of Black-African candidates during their education and training, including; the age of students, overseas education and explicit bias.

The report also outlined a number of interventions that could be taken by the GPhC, schools of pharmacy, training providers and NHS education authorities in England, Scotland and Wales that may help improve the experience and performance of some Black-African trainees, and offer benefits to all pharmacy students and trainees, including:

- More proactive approaches to student integration.
- Additional training for pre-registration pharmacist trainees and trainers.
- Greater guidance on the changing nature of the registration assessment and raising awareness about accessing papers.

²⁴ <https://www.pharmacyregulation.org/news/new-research-explores-experiences-and-performance-black-african-candidates>

An overview of what was discussed at the seminar is available on our website²⁵.

Equality impact assessment

We regularly carry out equality impact assessments (EIA) when developing or refining policies or procedures. Conducting an analysis of the equality and diversity implications of our proposals also helps to ensure that we are not acting in a way that is incompatible with a Convention right. The EIA aims to help ensure that our proposals do not unfairly affect groups with protected characteristics. Assessing the equality, diversity and inclusion impact of our policy development work is about being proactive in facilitating opportunities for people with the widest possible range of experiences and perspectives to engage with and influence our values, our culture, our strategy and the work we do. We aim to take an inclusive approach to working with users of pharmacy services, registrants, stakeholders and people affected in any way by our policy decisions.

At all stages of the development process, we consider how best to engage with equality groups, and equality and diversity issues inform our proposals from the outset. We seek to identify and mitigate any adverse impact on groups of people with a protected characteristic, including pharmacy owners and employers of pharmacist prescribers and pharmacy professionals, people using pharmacy services. We also consider how any proposed changes can help make a positive impact on these groups.

Survey of registered pharmacy professionals

To understand the current trends in pharmacy practice including those relating to the diversity of the workforce, we regularly carry out a major survey of registered pharmacy professionals. Over 12,000 pharmacists and over 6,000 pharmacy technicians (over 23% of the register) responded to our latest survey²⁶ published in 2019. A separate EDI report was also published which provides an analysis of key findings by protected characteristics defined in the Equality Act 2010. The findings will be used to inform our ongoing work on developing our EDI strategy.

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https://www.pharmacyregulation.org/sites/default/files/understanding_issues_relating_to_ethnicity_and_pharmacy_education_and_training_10_october_2016_event_report.pdf

²⁶ <https://www.pharmacyregulation.org/sites/default/files/document/gphc-2019-survey-pharmacy-professionals-main-report-2019.pdf>