

Consultation on draft guidance on evidence of English language skills

September 2015

The text of this document (but not the logo and branding) may be reproduced free of charge in any format or medium, as long as it is reproduced accurately and not in a misleading context. This material must be acknowledged as General Pharmaceutical Council copyright and the document title specified. If we have quoted third party material, you must get permission from the copyright holder.

© General Pharmaceutical Council 2015

Contents

Overview	4	Renewal of registration	13
The consultation process	5	Returning to the register	13
Background	7	Concerns about language competence	13
Knowledge of English	8	How to respond	14
Criteria for assessing language evidence	9	Consultation response form	15
Types of evidence we will accept	10	Equality monitoring	23
When to provide evidence of knowledge of English for first registration	12	Appendix 1 Draft Guidance on evidence of English language competence	25

The deadline for responding to this consultation is
Thursday 17 December 2015.

Consultation on draft guidance on evidence of English language skills

1. Overview

The GPhC is consulting until **Thursday 17 December 2015** on draft guidance about the evidence, information and documents that may be provided by an applicant or registrant for the purpose of satisfying the registrar that they have the necessary knowledge of English, and the process by which the registrar will determine whether he is satisfied that the person has this knowledge (see art 23A, Pharmacy Order 2010, inserted by the Health Care and Associated Professions (Knowledge of English) Order 2015)¹.

Alongside this consultation we are also consulting on changes we are proposing to our rules. The main purpose of these proposals is to implement the statutory requirements for a registrant to have an appropriate indemnity arrangement in force and to have the knowledge of English necessary for safe and effective practice, as conditions of their registration with us. The consultation on the draft amendment to rules can be found here www.pharmacyregulation.org/rules-and-guidance-consultation

¹ www.legislation.gov.uk/uksi/2015/806/pdfs/ukxi_20150806_en.pdf

2. The consultation process

The council has considered carefully a range of information and evidence as part of its development of this consultation on draft guidance. However, we wish to test our thinking and the council wants to make the best possible decisions when it meets to consider approving the guidance. We need help from those with information and views, to test both our overall approach to the guidance as well as the specific proposals about the evidence we will require from pharmacy professionals to demonstrate that they have the necessary knowledge of English for safe and effective practice and the potential impact or benefits of these proposals. Please let us know what you think about any or all of the proposals described in this document.

The consultation will run for 12 weeks and will close on Thursday 17 December 2015. During this time we would welcome feedback from individuals and organisations. We will send this document to a range of stakeholder organisations, including professional representative bodies, employers as well as patients' representative bodies. We hope they will review this consultation and consider responding.

Further copies of this document are available to download from our website www.pharmacyregulation.org/rules-and-guidance-consultation or you can contact us if you would like us to send you a copy of the document in an alternative format (for example in a larger font or in an alternative language).

How to respond

You can respond to this consultation in a number of different ways.

You can fill in the questionnaire at the end of this document or go to our website and fill in an online version there.

www.pharmacyregulation.org/rules-and-guidance-consultation

If you fill in the questionnaire provided here, please send it to:

- Email
consultations@pharmacyregulation.org with the subject 'English language consultation'
- Address
**English language consultation response
Regulatory Development Team
General Pharmaceutical Council
25 Canada Square
London
E14 5LQ**

Comments on the consultation process itself

If you have concerns or comments which you would like to make relating specifically to the consultation process itself, please send them to:

- Email
feedback@pharmacyregulation.org

or

- Address
**English language consultation process
Governance team
General Pharmaceutical Council
25 Canada Square
London E14 5LQ**

Please do not send consultation responses to this address.

Report of this consultation

Once the consultation period is completed, we will analyse the responses we receive and the council will take these into account when making its decisions. We will also publish a summary of the responses received and an explanation of the decisions taken. This will be available on our website www.pharmacyregulation.org

The council is scheduled to consider approving the guidance at its meeting in April 2016 and the guidance would then be published once the parliamentary processes amending our Registration and Fitness to Practise rules had been completed.

3. Background

We are the regulator for pharmacists, pharmacy technicians and registered pharmacies in Great Britain. It is our job to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmacy services in England, Scotland and Wales.

Our main roles include:

- approving qualifications for pharmacists and pharmacy technicians, and accrediting education and training providers
- maintaining a register of pharmacists, pharmacy technicians and pharmacy premises
- setting standards for conduct, ethics, proficiency, education and training, and continuing professional development (CPD)
- establishing and promoting standards for the safe and effective practice of pharmacy at registered pharmacies
- establishing fitness to practise (FtP) requirements, monitoring pharmacy professionals' FtP and dealing fairly and proportionately with complaints and concerns.

The main pieces of legislation governing the GPhC are the Pharmacy Order 2010 (SI 2010/231) and the Medicines Act 1968 (c. 67). More detailed provisions relating to our regulatory functions are set out in statutory instruments called 'rules'. This guidance on evidence and process has been drafted to comply with article 23A of the Pharmacy Order 2010.

The full text of the proposed guidance on evidence and process can be found in appendix 1.

4. Knowledge of English

[The Health Care and Associated Professions \(Knowledge of English\) Order \(SI 2015/806\)](#) (The Knowledge of English Order) was made in March 2015. The relevant provisions in it will come into force via a commencement order and will amend the Pharmacy Order to strengthen the GPhC's powers to introduce fair and proportionate language controls.

The aim of these legislative changes is to improve public protection by making sure that only pharmacy professionals who have a sufficient knowledge of the English language for safe and effective pharmacy practice are eligible to register and work in Great Britain (GB).

The requirement to have the necessary knowledge of English for safe and effective practice applies to all applicants and registrants including those qualified in the European Economic Area (EEA) and Switzerland.

Article 23A of the Pharmacy Order² requires the GPhC to consult on and publish guidance about:

- the evidence, information or documents that an applicant must provide to demonstrate that they have the necessary knowledge of the English language for safe and effective practice as a pharmacist or a pharmacy technician, and

- the process by which the registrar is to determine whether he is satisfied that the applicant has the necessary knowledge of English.

Any person who is refused registration on the grounds that they have failed to satisfy the registrar that they have the necessary knowledge of English will have a right of appeal.

The Knowledge of English Order also creates a new category of impairment of fitness to practise relating to English language competence. This will allow us to initiate fitness to practise proceedings in cases where a pharmacy professional's knowledge of the English language may pose a serious risk to patient safety.

The proposals set out in this consultation document are not designed to replace the important role that employers must continue to play in checking that the pharmacy professionals they employ have the necessary knowledge of English to practise safely and effectively in the role they have been employed to do.

² Article 23A of the Pharmacy Order is introduced by the Knowledge of English Order

5. The Guidance on evidence of English language skills

Currently the only applicants who are required to provide evidence of their knowledge of the English language are non-EEA qualified pharmacists. They do this by providing us with evidence that they have passed the academic version of the International English Language Testing System (IELTS)³ test with an overall score of at least 7 and with no score less than 7 in each of the four areas of reading, writing, listening and speaking, at one sitting of the test.

The IELTS test certificate showing these scores must be provided as part of the non-EEA qualified pharmacist's application for the Overseas Pharmacists Assessment Programme (OSPAP)⁴.

Criteria for assessing language evidence

Based on our experience of having used the IELTS test to demonstrate English language competence for non-EEA qualified pharmacist applicants we are proposing that all applicants must also demonstrate their competence in the English language in the four areas of:

- Reading
- Writing
- Listening and
- Speaking in English.

We are also proposing that any evidence provided must:

- be recent, objective, independent and robust;
- clearly demonstrate that the applicant can read, write and communicate with patients, pharmacy service users, carers, relatives and other healthcare professionals
- be readily verifiable by us.

Question 1

- **Do you agree that these proposed criteria will provide the registrar with adequate assurance that an applicant or registrant has the necessary knowledge of English for the safe and effective practice of pharmacy?**

³ www.ielts.org/

⁴ www.pharmacyregulation.org/sites/default/files/international_information_pack_0315.pdf

Types of evidence we will accept to demonstrate knowledge of English

UK qualified applicants

We are proposing that UK qualified pharmacy professionals who have:

- successfully completed the relevant approved qualifications taught and examined in English under the supervision of a registered pharmacist in line with our registration criteria⁵, and
- provided documentary evidence of these qualifications with their application for registration

would not normally be required to provide additional evidence of their English language competence to satisfy the registrar that they have the necessary knowledge of English for safe and effective practice.

Question 2

- **Do you think that our proposals for UK qualified applicants are clear?**

Non-UK qualified applicants

It is important that our proposals are fair and proportionate and to encourage consistency, we have looked at the guidance published last year by the General Medical Council in relation to both their International Medical Graduates and European qualified doctors.

The draft guidance therefore proposes that all non-UK qualified applicants can provide the same types of evidence to demonstrate their knowledge of English, irrespective of whether they qualified in

- an EEA country or Switzerland or
- a non-EEA country

The three types of evidence we are proposing to accept as evidence of English language competence are:

- Documentary evidence of having achieved the required scores in the IELTS test, or
- Documentary evidence of having been awarded a primary pharmacy qualification taught and examined solely in English in a country where English is the first and native language⁶, or
- Documentary evidence of recent practice of at least 2 years in a country where English is the first and native language.

Question 3

- **Do you agree that all non-UK qualified applicants should be required to provide the same type of evidence as specified under type 1, 2 or 3 in the guidance to demonstrate their knowledge of the English language?**

⁵ For the registration criteria for pharmacists please see www.pharmacyregulation.org/sites/default/files/Registration%20criteria%20for%20pharmacists%20September%202012_0.pdf
For the registration criteria for pharmacy technicians please see

www.pharmacyregulation.org/sites/default/files/Registration%20criteria%20for%20pharmacy%20technicians%20Dec%202013.pdf

⁶ First and native language is not the same as official language. The list of countries we accept is modelled on the UK Border Agency's list of 'majority English speaking countries' plus Ireland (www.gov.uk/government/uploads/system/uploads/attachment_data/file/340583/English_language_v11.0_EXT.pdf).

This proposal will result in a change to the evidence that we would accept from non-EEA qualified pharmacists to demonstrate that they have the necessary knowledge of the English language.

Currently these applicants are required to provide evidence of having recently⁷ passed the academic version of International English Language Testing System (IELTS)⁸ test with an overall score of at least 7 and with no score less than 7 in each of the four areas of reading, writing, listening and speaking, at one sitting of the test. An IELTS test certificate showing that the applicant has achieved the required score must be submitted together with the application for eligibility to start the Overseas Pharmacists Assessment Programme (OSPAP). This requirement is applied irrespective of whether the non-EEA qualified applicant completed a pharmacist's qualification taught and examined solely in English or worked in a country where English is the first and native language (for example in Australia or New Zealand).

The guidance proposes that non-EEA qualified pharmacists, like all other non-UK qualified applicants can, as an alternative, provide evidence of having a pharmacy degree taught and examined solely in English or documentary evidence of practice in a country where English is the first and native language to demonstrate that they have the necessary knowledge of English.

Question 4

- **Do you agree that non-EEA qualified pharmacists applying for the OSPAP should be able to demonstrate their knowledge of the English language by providing either type 2 or 3 evidence as specified in the guidance?**

This would be instead of requiring all such applicants to provide evidence that they have passed the academic version of the IELTS test and achieve the required scores in one sitting.

We are also proposing that the same type of evidence of English language competence would be required irrespective of whether the applicant wishes to register as a pharmacist or pharmacy technician. This would mean that where relevant a non-UK qualified pharmacy professional wishing to register as a pharmacy technician would be required to pass the academic version of IELTS with an overall score of at least 7 and with no score less than 7 in each of the four areas of reading, writing, listening and speaking, at one sitting of the test.

Question 5

- **Do you agree that, where relevant, non-UK qualified pharmacy technicians will be required to achieve the same scores in the academic version of the IELTS test as non-UK qualified pharmacists?**

⁷ When we refer to 'recent' we mean evidence relating to English language competency that is less than 2 years old at the point of making an application to the GPhC.

⁸ See www.ielts.org/ for further details about the IELTS test.

When to provide evidence of knowledge of English for first registration

An applicant for registration will need to provide evidence, information or documents to show they have the necessary knowledge of English for the safe and effective practice of pharmacy before they can register. We have set out the process to be followed in the guidance.

We are not proposing changes to the process for registration for UK qualified applicants. Such applicants are already required to provide documentary evidence of having successfully completed the relevant UK qualifications as set out in the criteria for registration as a pharmacist⁹ or pharmacy technician¹⁰.

Again in the case of non-EEA qualified pharmacists we are not proposing changing when such applicants will need to provide evidence, information or documents to show they have the necessary knowledge of English. As at present, documentary evidence will need to be provided with the application to start the OSPAP.

The process for EEA qualified applicants is set out in the Knowledge of English Order. A formal request for evidence of an applicant's knowledge of English can only be made after the applicant's qualification is recognised.

In relation to EEA qualified applicants assessed via the EU General System provisions¹¹ where we decide that the applicant's qualification does not meet our national qualification requirements for registration, the applicant is required to successfully complete a compensation measure before their qualification can be recognised by us. Under the Directive¹² it is our responsibility, as the competent authority, to determine how the compensation measure is to be structured and the status of the applicant undertaking it. Implementing legislation in relation to EEA qualified pharmacists¹³ provides that if a compensation measure is required this should be a period of adaptation training with assessments. Our policy is to require the applicant to complete a period of supervised practice with assessment in full compliance with our pre-registration training requirements.

In our guidance we are proposing that EEA qualified pharmacists or pharmacy technicians assessed via the EU General System provisions first provide evidence of their knowledge of the English language before they begin any required compensation measure¹⁴. This is because we want to make sure that their English language competence meets our requirements before they start working in a supervised capacity with patients, carers, their families and other healthcare professionals.

Question 6

- **Do you agree that EEA qualified applicants, who are required to complete a compensation measure under the General System provisions, should be required to provide evidence of their knowledge of English before they can start to work in a supervised capacity?**

⁹ www.pharmacyregulation.org/sites/default/files/Registration%20criteria%20for%20pharmacists%20September%202012_0.pdf

¹⁰ www.pharmacyregulation.org/sites/default/files/Registration%20criteria%20for%20pharmacy%20technicians%20Dec%202013.pdf

¹¹ Articles 10 to 14 of Directive 2005/36/EC on the recognition of professional qualifications

¹² Article 3(1)(g) of Directive 2005/36/EC on the recognition of professional qualifications

¹³ www.legislation.gov.uk/uksi/2007/2781/pdfs/uksi_20072781_en.pdf

¹⁴ The process outlined for General System applicants is dependent on the final government legislation and as such may be subject to change

Renewal of registration

The guidance proposes that registrants renewing their registration would be required to specify whether they had evidence to demonstrate that they have the necessary knowledge of English. Registrants would be required to provide documentary evidence if requested to do so by the registrar.

Question 7

Do you agree with the proposal that, at renewal, registrants would be required to:

- **specify whether they had evidence to demonstrate their knowledge of the English language, and**
- **provide this if requested to do so by the registrar?**

Returning to the register

The guidance proposes a number of criteria which we would consider when determining whether a pharmacy professional needs to provide further evidence to demonstrate that they have the necessary knowledge of English. This is not an exhaustive list but the criteria we are proposing to consider include:

- The length of time since the applicant last practised in GB
- Whether they had practised elsewhere or continued to live in GB whilst off the register
- Whether they had previously demonstrated English language competence with their initial application for registration

- The length of time the applicant was registered and practising in GB
- Other information as may be relevant, for example whether concerns were raised about the applicant's English language competence while previously registered.

Question 8

- **Do you agree with our approach to requesting further evidence of knowledge of English before we return an applicant to the register?**

Concerns about language competence

In the guidance we are proposing that where we receive an allegation or have concerns that a registrant may not have the necessary knowledge of English, we can require the registrant to undertake the academic level IELTS test and achieve an overall score of at least 7 with no score less than 7 in each of the four areas of reading, writing, listening and speaking, at one sitting of the test.

Question 9

- **Do you agree that where there is an allegation or concern about a registrant's knowledge of English the registrant can be required to undertake the academic version of the IELTS test and achieve the required scores in one sitting?**

Response to the consultation on draft guidance on evidence of English language competence for the General Pharmaceutical Council

How to respond

The consultation asks a series of questions, which are listed below.

You can fill in this questionnaire or go to our website and fill in an online version there.

www.pharmacyregulation.org/rules-and-guidance-consultation

If you fill in this questionnaire, please send it to:

- Email consultations@pharmacyregulation.org with the subject 'English language consultation'
- Address
English language consultation response
Regulatory Development Team
General Pharmaceutical Council
25 Canada Square
London
E14 5LQ

If any of your answers take up more than the space we have allowed, you can attach extra pages if you want. Please indicate which questions any extra pages apply to.

Responses must be received by
Thursday 17 December 2015.

How we will use your response

Your response to this consultation will be used to help us make decisions on our guidance. Following the consultation, we will publish a report summarising what we heard. We may quote parts of your response in that report or in other documents but we will make quotes from individuals anonymous. We may publish your response in full unless you tell us otherwise. If you want your response to remain confidential, you should explain why you believe the information you have given is confidential. However, we cannot guarantee that confidentiality can be maintained in all circumstances. The GPhC may need to disclose information under access to information legislation (usually the Freedom of Information Act 2000, the Environmental Information Regulations 2004 and the Data Protection Act 1998).

If your response is covered by an automatic confidentiality disclaimer generated by your IT system, this will not in itself, be binding on the GPhC.

Any diversity monitoring information you give us will be made anonymous and used to review the effectiveness of our consultation process. It will not be part of a published response.

Consultation response form

Response to the consultation on draft guidance on evidence of English language competence for the General Pharmaceutical Council

Publishing responses:

If you want your response to remain confidential, you should explain why you regard the information you have provided as confidential. However, we cannot give an assurance that confidentiality can be maintained in all circumstances.

please remove my name from the published response

Please tell us if you have concerns with us publishing any part of your response:

Background questions

First, we would like to ask you for some background information. This will help us to understand the views of specific groups, individuals and/or organisations and enables us to better respond to those views.

Are you responding:

- as an individual – Please go to section A
- on behalf of an organisation – Please go to section B

Section A - Responding as an individual

Please tell us your:

Name: _____

Address: _____

Email: _____

Where do you live?

- England
- Scotland
- Wales
- Northern Ireland
- Other (please give details)

Are you responding as:

- A pharmacy professional – Please go to section A1
- A member of the public
- Other (please give details)

Section A1 - Pharmacy professionals

Are you:

- A pharmacist
- A pharmacy technician

Please choose the option below which best describes the area you mainly work in:

- Community pharmacy
- Hospital pharmacy
- Primary care organisation
- Pharmacy education and training
- Pharmaceutical industry
- Other (please give details)

If you work in community pharmacy, are you:

- A pharmacy owner
- An employee
- A self-employed locum

Section B – Responding on behalf of an organisation

Please tell us your:

Name: _____

Job title: _____

Organisation: _____

Address: _____

Email: _____

Contact name for enquiries: _____

Contact phone number: _____

Is your organisation a:

- Pharmacy organisation
- Non-pharmacy organisation

Please choose an option below which best describes your organisation:

- Body/organisation representing professionals
- Body/organisation representing patients/ the public
- Body/organisation representing trade/industry
- Independent pharmacy (community pharmacy with 1-5 premises)
- Multiple pharmacy (community pharmacy with 6-99 premises)
- Large multiple (community pharmacy with 100 or more premises)
- NHS organisation/group
- Research, education and/or training organisation
- Government department/organisation
- Regulatory body
- Other (please give details)

Consultation questions

We are particularly interested in your views on the following points, although we welcome comments on any issues that you want to raise about the draft guidance.

1. Do you agree that these proposed criteria will provide the registrar with adequate assurance that an applicant or registrant has the necessary knowledge of English for the safe and effective practice of pharmacy? (see page 9 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 1?

2. Do you think that our proposals for UK qualified applicants are clear? (see page 10 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 2?

3. Do you agree that all non-UK qualified applicants should be required to provide the same type of evidence as specified under type 1, 2 or 3 in the guidance to demonstrate their knowledge of the English language? (see page 10 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 3?

4. Do you agree that non-EEA qualified pharmacists applying for the OSPAP should be able to demonstrate their knowledge of the English language by providing either type 2 or 3 evidence as specified in the guidance?

This would be instead of requiring all such applicants to provide evidence that they have passed the academic version of the IELTS test and achieve the required scores in one sitting. (see page 11 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 4?

5. Do you agree that, where relevant, non-UK qualified pharmacy technicians will be required to achieve the same scores in the academic version of the IELTS test as non-UK qualified pharmacists?
(see page 11 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 5?

6. Do you agree that EEA qualified applicants, who are required to complete a compensation measure under the General System provisions, should be required to provide evidence of their knowledge of English before they can start to work in a supervised capacity?
(see page 12 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 6?

7. Do you agree with the proposal that, at renewal, registrants would be required to:

- specify whether they had evidence to demonstrate their knowledge of the English language, and
- provide this if requested to do so by the registrar?

(see page 13 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 7?

8. Do you agree with our approach to requesting further evidence of knowledge of English before we return applicants to the register?
(see page 13 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 8?

9. Do you agree that where there is an allegation or concern about a registrant's knowledge of English the registrant can be required to undertake the academic version of the IELTS test and achieve the required scores in one sitting?
(see page 13 of the consultation document)

- Yes
- No
- Don't know

Do you have any further comments in response to question 9?

Equality monitoring

At the GPhC, we are committed to promoting equality, valuing diversity and being inclusive in all our work as a health professions regulator, and to making sure we meet our equality duties.

We want to make sure everyone has an opportunity to respond to our consultation on draft guidance. This equality monitoring form will provide us with useful information to check that this happens. You do not have to fill it in, and your answers here will not be linked to your consultation responses.

What is your ethnic group?

Please tick one box

White

- British Irish Other

Black or Black British

- Caribbean African Other

Mixed

- White and black Caribbean White and black African
 White and Asian other mixed (please give more information in the box below)

Asian or Asian British

- Indian Pakistani
 Bangladeshi other Asian (please give more information in the box below)

Chinese or Chinese British

- Other ethnic group**
 (please give more information in the box below)

What is your age?

- Under 20 20 – 29 years 30 – 39 years
 40 – 49 years 50 – 59 years 60 + years

What is your gender?

Please tick one box

- male female other

What is your sexual orientation?

Please tick one box

- heterosexual lesbian or gay bisexual other

What is your religion?

Please tick one box

- None Christian Buddhist Hindu
 Jewish Muslim Sikh
 Other (please give more information in the box below)

Do you consider that you have a disability?

Please tick one box

- Yes No

Appendix 1

Evidence of English Language skills: Ensuring pharmacy professionals have the necessary knowledge of English to practise safely in Great Britain.

Introduction

1. It has been a long established requirement of professional ethics that healthcare professionals should have sufficient English language competence for safe and effective practice. The General Pharmaceutical Council's (GPhC's) [Standards of Conduct, Ethics and Performance](#)¹⁵ requires all registered pharmacy professionals to communicate effectively with patients and pharmacy service users and to work in partnership with them and other healthcare professionals to manage their treatment and care. If a registrant does not have the necessary knowledge of English there is a risk that they may not be able to act in the best interests of patients which could compromise patient safety and lead to a fitness to practise investigation.
2. The Health Care and Associated Professions (Knowledge of English) Order 2015¹⁶ amends the Pharmacy Order and makes it a legal requirement for all registrants and applicants to have the necessary knowledge of English for safe and effective practice as a condition of registration with us.

Previously, if a pharmacy professional was a national of the European Economic Area (EEA) or Switzerland, the Pharmacy Order prevented us from checking their English language skills before we registered them. We were only able to check the English language skills of non-EEA nationals who qualified outside the EEA.

3. The Knowledge of English Order improves public protection. It enables us to introduce fair and proportionate language controls that would apply to all registrants and applicants for registration irrespective of nationality or country of qualification and gives the registrar powers to request evidence or information about a pharmacy professional's knowledge of English in certain circumstances.

How this change will affect you

4. Article 23A of the Pharmacy Order 2010¹⁷ requires the council to publish guidance setting out the evidence, information or documents you must provide to show you have the necessary knowledge of English to practise safely in Great Britain and the process to be followed when making that determination.

¹⁵ www.pharmacyregulation.org/sites/default/files/standards_of_conduct_ethics_and_performance_july_2014.pdf

¹⁶ www.legislation.gov.uk/uksi/2015/806/pdfs/ukxi_20150806_en.pdf

¹⁷ Article 23A of the Pharmacy Order was introduced by the Knowledge of English Order

5. The law and guidance applies to registrants and to all applicants seeking registration. It therefore applies:
- irrespective of whether you are applying to register as a pharmacist or pharmacy technician and
 - irrespective of whether you qualified as a pharmacy professional:
 - in the United Kingdom (UK),
 - in another European Economic Area (EEA) member state or Switzerland, or
 - in a country outside of the UK, EEA or Switzerland.
6. The registrar must take account of this guidance when deciding whether you have shown that you have the necessary knowledge of English. The registrar can refuse to register you if you do not provide evidence of your knowledge of English or where the evidence you provide does not meet the criteria set out in this guidance.

Criteria for assessing language evidence

7. Our criteria for assessing evidence and information in relation to knowledge of English are set out below. The criteria reflect our objective of ensuring patient safety and provide us with adequate assurance that you have the necessary knowledge of English¹⁸ for the safe and effective practice as a pharmacy professional in Great Britain before we can register you.

8. The evidence you provide must demonstrate your competence in the four areas of:
- Reading
 - Writing
 - Listening and
 - Speaking in English
- and must:
- be recent, objective, independent and robust;
 - clearly demonstrate that you can read, write and communicate with patients, pharmacy service users, carers, relatives and other healthcare professionals in English; and
 - be readily verifiable by us.

Types of evidence we will accept to demonstrate your knowledge of English

UK qualified applicants

9. If you are a UK qualified applicant wishing to register as a pharmacist having 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

you will in most cases automatically satisfy the registrar that you meet the English language requirements for registration.

¹⁸ Article 3(1) and Article 20(1)(a)(iia) and 20(2)(a)(iia) of the Pharmacy Order 2010 inserted by the Knowledge of English Order

10. If you are 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

you will in most cases automatically satisfy the registrar that you meet the English language requirements for registration.

Non-UK qualified applicants

11. There are different ways in which you may be able to demonstrate that you have the necessary knowledge of English to practise in Great Britain and this is reflected in the types of evidence we will accept.
12. We will review our English language evidence requirements on a regular basis to ensure they remain suitable. We will give full consideration to new sources of evidence that can provide the necessary assurance that you have the necessary knowledge of English.
13. However, based on our experience of assessing language evidence from international pharmacists qualified outside the EEA we have set out below the types of evidence we will accept as demonstrating that you have the necessary knowledge of English to practise as a pharmacy professional in GB.

Evidence type 1:

A recent¹⁹ pass of the academic version of International English Language Testing System (IELTS)²⁰ test with an overall score of at least 7 and with no score less than 7 in each of the four areas of reading, writing, listening and speaking at one sitting of the test.

14. We may accept IELTS test scores that are more than two years old if you can provide evidence to demonstrate that you have maintained your English language proficiency during that time. This can be for example if you have subsequently worked as a pharmacy professional in a country where English is the first and native language and at least 75% of your day to day interaction with patients, pharmacy service users, carers, relatives and other healthcare professionals has been in English.

Evidence type 2:

A recent pharmacy qualification that has been taught and examined in English from a country (other than the UK) where English is the first and native language²¹ (e.g. Ireland, United States of America, Australia, New Zealand).

15. The entire course must have been taught and examined in English and at least 75% of any in-service training including clinical interaction, contact with patients, their carers and other healthcare professionals as part of that course of study must have been conducted in English.

¹⁹ When we refer to 'recent' we mean evidence relating to English language competency that is less than 2 years old at the point of making an application to the GPhC.
²⁰ www.ielts.org

²¹ First and native language is not the same as official language. The list of countries we accept is modelled on the UK Border Agency's list of 'majority English speaking countries' plus Ireland (www.gov.uk/government/uploads/system/uploads/attachment_data/file/340583/English_language_v11.0_EXT.pdf).

16. You will need to be able to show that your training provided you with the opportunity to demonstrate your ability in reading, writing, listening and speaking in English.

Evidence type 3:

Recent practice for at least two years as a pharmacy professional in a country where English is the first and native language.

17. You will be required to provide a detailed written reference from your employer(s) as to your knowledge of English. As part of this reference an employer will be required to provide evidence of how you have demonstrated your ability in the four areas of reading, writing, listening and speaking in English.
18. If you were required to pass an English language test before being permitted to register and practise as a pharmacy professional in another country where English is the first and native language then you can provide evidence of having passed such an English language assessment.

When you need to provide evidence of your knowledge of English for first registration

This section describes how and when you will need to provide evidence or information to show whether you have the necessary knowledge of English for the safe and effective practice of pharmacy in Great Britain, and the process we will follow. The process will depend on where you qualified.

UK qualified applicants

19. If you are a UK qualified applicant the registration process has not changed since the English language requirements were introduced. As before you will need to submit documentary evidence of having successfully completed the relevant UK qualifications as set out in the criteria for registration as a pharmacist²² or pharmacy technician²³ together with your application for registration. You must provide the evidence in the form and manner described in the registration application form and supporting guidance. You will not normally be required to provide further evidence of your English language ability.
20. Pharmacist applicants who had submitted a pre-registration training plan where they requested to complete up to 13 weeks of their pre-registration training placement in another European member state in accordance with the pre-registration training scheme²⁴ and then passed the GPhC registration assessment will also not normally be required to provide additional evidence of their language ability with their application for registration.

²² www.pharmacyregulation.org/sites/default/files/Registration%20criteria%20for%20pharmacists%20September%202012_0.pdf

²³ www.pharmacyregulation.org/sites/default/files/Registration%20criteria%20for%20pharmacy%20technicians%20Dec%202013.pdf

²⁴ www.pharmacyregulation.org/sites/default/files/GPhC%20Education%20Procedures%20December%202013.pdf

Non-UK qualified applicants

21. If you are a non-UK qualified applicant, the process for providing evidence to demonstrate your knowledge of English will depend on whether you qualified:

- in a country outside of the UK, EEA or Switzerland. If this applies you will need to follow the process described under non-EEA qualified applicants below
- in the EEA or Switzerland and are covered by the provisions in Directive 2005/36/EC on the Recognition of Professional Qualifications (the Directive)²⁵. If this applies you will need to follow the process described under EEA qualified applicants below.

22. Non-EEA qualified applicants

22.1 If you are a non-EEA qualified pharmacist you will need to provide evidence to demonstrate your knowledge of English as part of your application for eligibility to start the Overseas Pharmacists Assessment Programme (OSPAP)²⁶.

22.2 If you are unable to provide evidence to satisfy the criteria under either the primary pharmacy qualification or recent practice as a pharmacist in a country where English is the first and native language you will be required to provide evidence of your English language proficiency by achieving the required scores in the academic version of the IELTS in one sitting of the test.

22.3 If you are a non-EEA qualified pharmacy professional and wish to register as a pharmacy technician, because you will first have to complete the same requirements as a UK qualified applicant described in paragraph 10, you will not normally be required to provide additional evidence of your language ability with your application for registration. As at present you will need to submit documentary evidence of having successfully met the criteria for registration as a pharmacy technician together with your application for registration. You must provide the evidence in the form and manner described in the registration application form and supporting guidance.

22.4 However if a situation arises during the registration process where the applicant requires the services of a translator or another person in order to communicate in English with us we will review the evidence that has already been provided. In these cases we are likely to request further evidence of the applicant's knowledge of English before granting registration.

23. EEA qualified applicants

23.1 If you are an EEA qualified pharmacist you are first required to make an application for recognition of your qualification. You are not required to provide evidence to show your knowledge of English when you make this application for recognition but you can do so if you wish.

²⁵ www.eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02005L0036-20140117&from=EN

²⁶ www.pharmacyregulation.org/education/pharmacist/overseas-pharmacists-assessment-programme

- 23.2 If we determine that your pharmacist qualification meets the requirements for automatic recognition under the Directive²⁷, we will inform you that we have recognised your qualification.
- 23.3 Where you had supplied evidence of your English language competence with your application for recognition and the registrar determines that the evidence submitted meets our criteria and is described under types of evidence above, we will not normally request further evidence or information from you, and you can proceed to complete your application for registration.
- 23.4 Where –
- you did not provide evidence to show your knowledge of English with your application for recognition, or
 - you did provide evidence but this does not satisfy the registrar as to your English language competence
- we will still recognise your qualification, provided that this meets our requirements. We will write to you informing you of this and ask you to provide evidence of your language competence before you can progress on to registration. If you do not provide evidence of your knowledge of English with your initial application, this formal request for evidence cannot be made until we have recognised your qualification.
- 23.5 If you are an EEA qualified pharmacist or pharmacy technician and your application is being assessed via the EU General

System provisions²⁸ we will ask you to provide evidence of your English language competence before we authorise you to begin any required compensation measure. This is because we want to make sure that your English language competence meets our requirements before you start working in a supervised capacity with patients, carers, their families and other healthcare professionals.

- 23.6 If the registrar is still not satisfied as to your English language competence after you have provided further evidence or information, or if you are unable to provide any evidence, we will ask you to pass the academic version of the IELTS test and achieve the required scores in one sitting before we can register you or before you can start the compensation measure where relevant.

Renewal of registration

24. In an application for renewal you will be required to specify whether you have evidence, information or documents demonstrating that you have the necessary knowledge of English. You will be required to provide this evidence if requested to do so by the registrar.

Returning to the register

25. In cases where your registration has lapsed or you have voluntarily removed yourself from the register you may apply to the registrar to return to the register and restore your entry.

²⁷ For automatic recognition your qualification must be listed in Annex V 5.6.2 and comply with the minimum training requirements set out in Article 44 or you must be able to benefit from the acquired rights provisions set out in Article 23 of Directive 2005/36/EC.

²⁸ Articles 10 to 14 of Directive 2005/36/EC.

Some pharmacy professionals apply to return to the register soon after their registration has lapsed while others do so after having been off the register for a more significant period of time, for example, after having spent time practising abroad or when returning to practice after a career break.

26. If you are returning to the register we will consider the following criteria to determine whether you have shown that you have the necessary knowledge of English:

- The length of time since you last practised in GB
- Whether you had practised elsewhere or continued to live in GB whilst off the register
- Whether you had previously demonstrated English language competence at your initial registration
- The length of time you were registered and practising in GB
- Other information as may be relevant for example whether concerns were raised about your English language competence while previously registered.

27. This is not an exhaustive list but gives an indication of matters we will take into account in determining whether to request further evidence of your knowledge of English before returning you to the register.

Fees

28. If you are requested to pass the academic version of the IELTS test and achieve the required scores in one sitting before applying for registration or restoration, you must pay the fee for taking the IELTS test yourself.

Rights of appeal

29. Article 39 of the Pharmacy Order sets out that you have a right of appeal to the Appeals Committee where the registrar makes the decision that he is not satisfied that you have the necessary knowledge of English and requires you to take an examination or assessment (the IELTS test).

If a concern about language competence is raised whilst a pharmacist or pharmacy technician is on the register.

30. Under article 51(1)(ca) of the Pharmacy Order, your fitness to practise may be considered to be impaired on the basis that you do not have the necessary knowledge of English. If we receive an allegation or have concerns ourselves that you do not have the necessary knowledge of English and as a result your fitness to practise may be impaired then this will be treated as an allegation that will be dealt with via the fitness to practise process. Such cases will be dealt with in a similar way to any other allegation of impaired fitness to practise. If you are subject to such an allegation or concern the registrar, Investigating Committee or Fitness to Practise Committee can require you to be assessed as to your knowledge of English. If this happens you will be required to undertake the academic version of the IELTS test and achieve an overall score of at least 7 with no score less than 7 in each of the four areas of reading, writing, listening and speaking at one sitting of the test.

General Pharmaceutical Council

**25 Canada Square,
London
E14 5LQ**

T: 020 3713 8000

W: pharmacyregulation.org

E: info@pharmacyregulation.org



[@TheGPhC](https://twitter.com/TheGPhC)



[Facebook.com/TheGPhC](https://www.facebook.com/TheGPhC)



[LinkedIn.com/company/general-pharmaceutical-council](https://www.linkedin.com/company/general-pharmaceutical-council)