Consultation response from the General Pharmaceutical Council: Facing facts, shaping the future

This is a consultation response from the General Pharmaceutical Council, the regulator for pharmacy in Great Britain. Our main functions are:

- setting standards for the education and training of pharmacists, pharmacy technicians, and approving and accrediting their qualifications and training;
- maintaining a register of pharmacists, pharmacy technicians and pharmacies;
- setting the standards that pharmacy professionals have to 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;
- setting standards for registered pharmacies which require them to provide a safe and effective service to patients; and
- inspecting registered pharmacies to check if they are meeting our standards.

Given our particular remit, most of our comments focus on pharmacy, although we have included some more general observations as well.
1. Facing the facts

Strategic investment

Turning to the first part of the strategy, facing the facts, we welcome this attempt to draw together the competing demands on education and training in English healthcare and to outline the initiatives underway currently. The consultation presents the challenges frankly, particularly in terms of strengthening recruitment to shortage professions and expanding the range of professions to make best use of them all. Perhaps most importantly the strategy looks ahead not only as far as the end of the Five Year Forward View but beyond that, recognising that developing and sustaining the healthcare workforce in the long term will take strategic investment over a 30-year period to expand and realign the current workforce with future needs. We would emphasise the need not just for a long-term commitment to developing the healthcare workforce through education and training but, critically, doing so strategically and comprehensively. By comprehensively we mean considering the education and training needs of a profession holistically rather than as a series of interventions.

The multi-professional team

We think it is right to emphasise the importance of multi-professional team working, as the consultation does quite clearly, and we welcome initiatives to rebalance the skills mix across the healthcare professions by reconfiguring current roles and introducing new ones. If implemented effectively, this could allow all professional groups to operate at the top of their licence.

2. Shaping the future

Developing the professions: strategic investment

Having faced the facts, we now turn to the more difficult aspect of the strategy: shaping the future. We note that it contains a significant number of initiatives, each one with its own rationale, but our concern is that the whole may not be greater than the sum of the parts. Our view is that the strategy could be strengthened by greater cohesion in its education and training vision for each profession and the healthcare system as a whole. Using pharmacy as an example, we note and support the workforce initiatives in the Pharmacy Integration Fund, in particular the focus on independent prescribing and post-registration training for pharmacists, but we would wish to see the strategy set out a vision for the profession’s education and training journey from initial education and training, through the early years of practice and beyond.

A consistent theme in the strategy is the need for pharmacists to play a greater role in the clinical delivery of healthcare, which we support. However, in order to achieve this student/trainee pharmacists must be exposed to clinical practice, particularly but not exclusively in support of independent prescribing, throughout their initial education and training. Tackling this issue strategically with clinical funding for university study and delivering the five years of initial education and training in an integrated and coherent way will lay the foundations for delivering the clinical pharmacists of the future. Linking this to a clear vision for post-registration training in the early years of practice is the only systematic way to upskill the pharmacist workforce, feeding the register with whole cohorts of clinically
literate pharmacists year on year. The current system, in which academic study and clinical practice are separate and in which some but not all pharmacists are trained as prescribers or are trained to work in GP practices, will never achieve the necessary wholesale change required for pharmacists to deliver effective and comprehensive clinical healthcare in a sustainable way.

We have illustrated the point with reference to pharmacists but it does apply more widely to other professional groups.

Developing the professions: new roles

We note that the strategy seeks to address some workforce challenges by introducing new roles, such as physician assistants and nursing associates. We know from our own experience of regulating pharmacy technicians that these roles can add value to healthcare teams if used with clarity of purpose. Our caveat, however, is that they must not be seen as a means to the simple end of backfilling shortages in other professions, rather they must be professions in their own right with clear education, training and progression routes.

Pharmacy technicians

The role of the pharmacy technician, particularly the community pharmacy technician, is not sufficiently visible in the strategy and it is unclear what the vision for the future role of the pharmacy technician is. We believe that in the next iteration of the strategy there should be a more clearly defined vision for the important role pharmacy technicians can play, articulated through a coherent plan for career-long education, training and development.

To summarise our feedback, we suggest that thought is given to whether seeing through current education and training initiatives is sufficiently strategic to achieve ultimately what is needed - a reconfigured more flexible healthcare workforce - or whether it would be better to develop professions systematically from the bottom up to achieve sustainable change.

Please do not hesitate to contact if you would like us to develop any of the points we have made in this submission.

Yours sincerely,

Duncan Rudkin, Chief Executive and Registrar