General Pharmaceutical Council

University of Hertfordshire independent prescribing course reaccreditation event report, November 2020

Contents

Event summary and conclusions

Provider	University of Hertfordshire
Course	Independent prescribing course
Event type	Reaccreditation
Event date	26 November 2020
Reaccreditation period	January 2021 – January 2024
Relevant standards	GPhC education and training standards for pharmacist independent prescribers, January 2019
Outcome	Approval The accreditation team agreed to recommend to the Registrar of the General Pharmaceutical Council (GPhC) that pharmacist independent prescribing course provided by the University of Hertfordshire should be reaccredited for a further period of three years.
Conditions	There were no conditions.
Standing conditions	The standing conditions of accreditation can be found here.
Recommendations	No recommendations were made.
Minor amendments	There were no minor amendments.
Registrar decision	Following the event, the Registrar of the GPhC accepted the accreditation team's recommendation and approved the reaccreditation of the programme for a further period of 3 years.
Maximum number of all students per cohort:	135
Number of pharmacist students per cohort:	65
Number of cohorts per academic year:	3
Approved to use non-medical DPPs:	Yes

Key contact (provider)	Dr Denise Knight, Professional Lead: Primary Care and Non-medical Prescribing
Provider representatives	Dr Sultan Cetiner, Senior Lecturer, Non-medical Prescribing
	Hayley Hassett, Senior Lecturer, Non-medical Prescribing
	Kelly Lefteri, Head of Pharmacy, Department of Clinical, Pharmaceutical and Biological sciences
	Shabnam Mamaghaniyeh, Senior Lecturer, Department of clinical, pharmaceutical and biological sciences
	Philomena Shaughnessy, Head of Department, Nursing, Health & Wellbeing
	Sarah Watkin, Senior Lecturer, Non-medical Prescribing
Accreditation team	Dr Ruth Edwards (event Chair), Head of Professional Experience, Aston University
	Fiona Barber, Independent Member, Leicester City Council
	Sandra Hall, Retired Head of Pharmacy Practice, Leicester School of Pharmacy, De Montfort University
GPhC representative	Philippa McSimpson, Quality Assurance Manager, GPhC
Rapporteur	Jane Smith, Chief Executive Officer, European Association for Cancer Research
Observers	Parbir Jagpal, Director of Postgraduate Studies and Programme Director-Practice Certificate in Independent Prescribing, University of Birmingham
	Rachael Mendel, Quality Assurance Officer, GPhC

Introduction

Role of the GPhC

The General Pharmaceutical Council (GPhC) is the statutory regulator for pharmacists and pharmacy technicians and is the accrediting body for pharmacy education in Great Britain. The reaccreditation process is based on the GPhC's standards for the education and training of pharmacist independent prescribers January 2019.

The GPhC's right to check the standards of pharmacy qualifications leading to annotation as a pharmacist independent prescriber is the Pharmacy Order 2010. It requires the GPhC to 'approve'

courses by appointing 'visitors' (accreditors) to report to the GPhC's Council on the 'nature, content and quality' of education as well as 'any other matters' the Council may require.

The powers and obligations of the GPhC in relation to the accreditation of pharmacy education are legislated in the Pharmacy Order 2010. For more information, visit:
http://www.legislation.gov.uk/uksi/2010/231/contents/made

Background

The University of Hertfordshire was accredited by the GPhC in 2011 to provide a programme to train pharmacist independent prescribers. The course was reaccredited in November 2014 and again in November 2017. At the 2017 event, the team agreed to recommend to the Registrar that the University should be reaccredited as a pharmacist independent prescribing course provider for a further period of three years to provide a course to train pharmacist independent prescribers. There were no conditions and no recommendations. In line with the standards for the education and training of pharmacist independent prescribers January 2019, an event was scheduled on 26 November 2020 to review the course's suitability for reaccreditation.

In order to meet the high level of demand, the programme is now delivered three times each year, in September, January and March. Three groups of students are taught in the September and January cohorts and two groups in March, with a maximum of 135 students per cohort, or 45 students per group. The course is led by a nurse. The number of pharmacists in each group is maintained at 20- 22 (maximum 65 per cohort) to promote multi-professional learning.

Documentation

Prior to the event, the provider submitted documentation to the GPhC in line with the agreed timescales. The documentation was reviewed by the reaccreditation team and it was deemed to be satisfactory to provide a basis for discussion.

The event

Due to the Covid-19 pandemic, the GPhC modified the structure of the event so that it could be held remotely. The event was held via videoconference between the University of Hertfordshire and the GPhC on 26 November 2020 and comprised of meetings between the GPhC reaccreditation team and representatives of the University of Hertfordshire prescribing course.

Students who were currently undertaking the course, or who had completed it in the last three years, contributed to the event by completing a qualitative survey, responses to which were reviewed by the GPhC accreditation team.

Declarations of interest

There were no declarations of interest.

Schedule

The event

Meeting number	Meeting	Time
1.	Private meeting of accreditation team and GPhC representatives	09:30 – 10:30
2.	Meeting with course provider representatives	11:00 – 13:00
3.	Lunch	13:00 – 14:00
4.	Learning outcomes testing session	14:00 – 14:30
5.	Panel meeting of the accreditation team and GPhC representatives	14:30 – 15:30
6.	Feedback to course provider representatives	15:30 – 15:45

Key findings

Part 1 - Learning outcomes

During the event the team reviewed all 32 learning outcomes relating to the independent prescribing course. To gain additional assurance the team also tested a sample of **five** learning outcomes during a separate meeting with the provider and was satisfied that **all 32 learning outcomes will be met** to a level as required by the GPhC standards.

The following learning outcomes were tested at the event: **5, 14, 15, 19 and 30.**

Domain - Person centred care (outcomes 1-6)

Learning outcomes met? Yes ☒ No ☐

Domain - Professionalism (outcomes 7-15)

Learning outcomes met? Yes ☒ No ☐

Domain - Professional knowledge and skills (outcomes 16-20)

Learning outcomes met? Yes ☒ No ☐

Domain - Collaboration (outcomes 27-32)

Learning outcomes met? Yes ☒ No ☐

Part 2 - Standards for pharmacist independent prescribing course providers

Standards 1 - Selection and entry requirements

The team was satisfied that all six criteria relating to the selection and entry requirements will be met. (The criteria can be found [here](#))

Applications are made through an online portal. Entry criteria are published and made clear before students make their application, which consists of:

- a completed University application form with details of academic and professional qualifications, a full account of professional experience and a self-declaration statement to confirm that the applicant has no criminal record.
- a supporting admissions form which requires the applicant to describe their clinical and therapeutic experience relevant to their intended scope of prescribing practice. The proposed Designated Prescribing Practitioner (DPP) is required to confirm that they are willing to support the student in practice and that they are supported by their employing organisation to undertake the role of DPP. The DPP's qualifications, professional registration and experience in learning, teaching and assessment are also required. This form is signed by a manager (or other GPhC registrant if the manager is not a qualified pharmacist) who is able to confirm the applicant's experience and skills. A supporting reference from a senior professional or supervising pharmacist is sought for applicants with self-employed status.

The registration status of the applicant, the DPP and supporting manager/referee are reviewed on the GPhC Register to ensure they are current and there are no recorded restrictions on practice.

Applications are considered by two admissions tutors who will discuss applications with each other and with the Course Lead where they have any concerns about the extent to which the admissions criteria are met. Any queries are followed up with the applicant by email or telephone. There is a process for applicants to appeal admissions decisions.

The admissions tutors are trained in equality and diversity issues. The course team have access to wide range of applicant equality and diversity data and review this against acceptances to make sure there is no evidence of bias.

Standard 2 - Equality, diversity and inclusion

The team was satisfied that all five criteria relating to equality, diversity and inclusion will be met.

The University has robust equality and diversity policies and processes in place. At course level, all staff are required to undertake unconscious bias and equality and diversity training annually. The School has a recently-established BAME group which looks at monitoring data and identifies any specific concerns.

Equality and diversity data relevant to the course are considered within the annual monitoring, evaluation and review process (AMER). AMER requires the development of a detailed report by the Course Lead focused on student admissions and outcomes which includes diversity data. Any revisions to the programme required to enhance outcomes for all students are incorporated within an action plan for the forthcoming academic year.

In terms of the course content, diversity issues are considered in the design of all materials, for example ensuring that case studies are culturally appropriate and use patients from a diverse range of backgrounds.

The University has a student wellbeing service which offers support with any matter that might affect a student's ability to complete their course successfully. Advice about this confidential service is included in the student induction and within the Programme Handbook. Students are able to self-refer to this service. A Study Needs Agreement is developed which outlines the additional support that must be provided to the student to enable their success. This is shared confidentially with the Course Lead who will take steps to ensure that the student has access to the support they require.

Students with additional study needs must achieve all GPhC learning outcomes, with no modifications to outcomes allowed.

Standard 3 - Management, resources and capacity

The team was satisfied that all six criteria relating to the management, resources and capacity will be met or continue.

A management plan was provided to the team in advance of the event. Risk identification and management are the responsibility of the Course Lead, working with the Head of Department and relevant Associate Deans. Risks are highlighted in the AMER and are also discussed at the Programme Committee which has student, DPP and service user representatives, as well as staff members. This risk management process was used in response to the Covid-19 pandemic, although early decisions had to be taken very quickly, so there was a reliance on informal networks rather than Committees at that point.

Everyone involved in the delivery of the course is clear about their roles and responsibilities. All members of the course team are provided with a comprehensive induction to the course. On-going support in their role is provided by the Course Lead and other experienced members of the team. The University provides a comprehensive induction for new external examiners to ensure familiarity with their role in academic quality assurance. This includes a meeting with the Course Lead to introduce the programme and its requirements.

All students have a personal tutor who provides support with learning in the University setting. The personal tutor is also responsible for providing initial and on-going support to the student and DPP in relation to the period of learning in practice. Formal practice placement agreements between the DPPs and the University are subject to approval by the University's legal department and will be developed alongside an honorary contract between the DPP and the student. A placement audit takes place for those practice areas where no formal placement agreement exists. The audit provides an opportunity to discuss all responsibilities and accountability.

In 2019, the Programme Committee had noted some concerns about the physical resources available to the course, relating to unsuitable accommodation. The course is now delivered in different, campus-based accommodation and reassurance was given at the event that appropriate resources are available to the course.

Standard 4 - Monitoring, review and evaluation

The team was satisfied that all six criteria relating to the monitoring, review and evaluation will be met.

The programme is subject to a robust annual monitoring, evaluation and review process which considers, inter alia, student admissions and attrition data, student outcomes and student and external examiner feedback. The action plan developed as a result of this review identifies a timescale for completion of any developments. Progress against the plan is reviewed by the Programme Committee which meets once per cohort. Reports from this Committee are reviewed by the School Academic Committee, a sub-committee of the University Academic Committee.

As an example, service user involvement in the management of the course was made part of the action plan for 2019-20 year. This resulted in additional service users being recruited to be involved in the course delivery and in the OSCE assessment. A service user has also joined the Programme Committee and the provider is looking for ways to also involve service users in the admissions process.

Course material is regularly reviewed and updated to take account of changes and developments in guidance and best practice. The course underwent periodic review in 2019 and was revalidated at that point. The changes relating to the planned introduction of the role of DPP have been subject to internal academic quality review and approval by the Associate Dean for Academic Quality Assurance.

Student feedback on teaching and learning is sought informally by tutors following each session and also more formally through the feedback provided by student representatives at each Programme Committee. The University seeks feedback on the quality of learning and teaching and University resources through an online mid-module feedback questionnaire made available to all students. Collated responses are sent to the Course Lead. All forms of student feedback are fully discussed at the Programme Committee and will inform the action plan as appropriate.

Student feedback about individual members of staff is made available to the respective line manager and is used to inform discussion at the annual appraisal so that teaching abilities can be monitored and enhanced where necessary. All academic members of staff are required to engage in an annual peer review of their teaching. The review is always undertaken by an academic colleague involved in a different programme to enable the sharing of different perspectives.

The quality of assessment processes is monitored by the Board of Examiners and is informed by feedback from the programme's external examiner. The external examiner reviews a sample of all coursework and exams and provides feedback about the parity and consistency of internal marking processes and the quality of the markers' comments received by students. The examiner will also evaluate the extent to which the standard of students' work is comparable with that from other non-medical prescribing programmes.

The monitoring and review of the supervision provided by DPPs is coordinated through the personal tutors. Each personal tutor maintains close contact with their tutees and will visit them in practice and meet with their DPP if concerns are raised.

DPPs are supported with an introductory email from the course team along with a series of documents. They are introduced to the personal tutor so they have a direct contact if needed.

Standard 5 - Course design and delivery

The team was satisfied that all ten criteria relating to the course design and delivery will be met.

The course involves 26 days' study delivered over a five-month period for students, together with an additional 12 days' (90 hours) experience in supervised practice, supported and assessed by a DPP.

The course is organised around the following themes:

- Systematic approaches to assessment and diagnosis
- Pharmacology and prescribing practice
- Medicines' optimisation and governance frameworks in prescribing practice
- Supervised practice

The course adopts a blended learning strategy which combines direct classroom contact such as lectures and workshops with timetabled guided study activities, co-ordinated through the University's managed learning environment. This allows student access to a range of on-line and other learning resources which are used to guide them to apply knowledge and understanding gained from the classroom within their intended scope of prescribing practice. Peer group communication and collaboration is also fostered, enabling students to gain from the wide range of experience and specialist knowledge available across each cohort.

The classroom sessions include two days of hands-on clinical skills development. Pharmacists are not expected to attend the Pharmacology and Prescribing Practice sessions; the lecture notes and other resources are made available for revision purposes.

The programme has been delivered largely online since the initial lockdown in March 2020. A range of strategies have been used to ensure effective learning and teaching during this time, including the delivery of synchronous online teaching sessions and the use of tools such as online quizzes and breakout rooms. Assessment and diagnostic skills sessions have continued to be delivered via one face-to-face teaching day (instead of two) in a Covid-secure skills laboratory with reduced student numbers to enable social distancing and with access to appropriate personal protective equipment. Further clinical skills training is delivered online, and students can request additional support if required. Tutors have provided regular online small group tutorials, together with individual tutorials on student request.

The course team met with students, service users, external stakeholders, employers and Trust representatives to discuss the new GPhC standards and how to meet them. Pharmacists were widely involved in the design of the course and the programme development team included two pharmacist lecturers and four pharmacist students. To ensure wider representation of service users in the development process, discussion of the programme took place at two local support

groups involved with service users and carers, one in a hospital setting and one in the community.

The course content has been updated to reflect changes in practice due to the pandemic. For example, information on remote consultations and remote prescribing is now highlighted.

Regulations specific to the course have been developed to ensure that patient safety and safe and effective practice are prioritised. Although no longer a GPhC requirement, a fail mark is awarded where there is a failure to identify a serious problem or to provide an answer which would cause the patient harm in any assessment.

The School has clearly defined policy and processes for the management of situations where there are concerns about Fitness to Practise which are made available to students via the virtual learning environment and within the Portfolio of Practice Evidence.

Standard 6 - Learning in practice

The team was satisfied that all five criteria relating to the learning in practice will be met.

A period of 90 hours of supervised practice must be undertaken by all pharmacist independent prescribers in training, with the DPP assuming primary responsibility for supervision. This is clearly referenced in the Programme Specification and other programme documents.

Approval of the DPP occurs following scrutiny of the supporting admissions form by the admissions tutor. Further information will be sought if the initial form is insufficiently detailed to allow the admissions tutor to judge the DPP's suitability for the role.

Student engagement in supervised practice has continued where possible during the Covid-19 pandemic. In recognition of the reduced availability of direct patient contact, guidance was developed for students outlining the essential practice requirements in relation to Covid-19 to ensure that they would be able to meet all required competencies. The University simplified its processes in relation to students seeking to defer one or more assignments, and students were signposted to this information. Many students from the January 2020 cohort found it necessary to seek a deferral due to the constraints on practice and their ability to study arising from the pandemic. It also proved necessary to suspend the whole March 2020. The majority of students affected were able to resume their studies in September 2020.

Standard 7 - Assessment

The team was satisfied all eleven criteria relating to the assessment will be met.

The course is assessed by means of:

- In-Course Applied Pharmacology Test involving 15 multiple choice questions, three short answer questions and two longer answer questions (80% pass mark)
- Numeracy assessment (100% pass mark)
- Objective Structured Clinical Examination (OSCE) (assessed on a pass/fail basis). The OSCE focuses on a typical prescribing scenario within the student's intended field of prescribing practice, chosen from three possible scenarios submitted by the student. It involves two areas of assessment:
  - key diagnostic skills

- approach to shared decision-making and facilitation of the patient's appropriate use of the medicine(s) to be prescribed
- 2,000 word essay, providing a clinical and evidence-based rationale for the product prescribed within the consultation presented in the portfolio (pass mark 50%)
- Portfolio of Practice Evidence to include signed statement of competence. A pass grade must be awarded for all competencies. The portfolio includes as an appendix an assessment and diagnostic skills workbook focused on competencies relevant to the intended scope of prescribing. In order to ensure appropriate quality assurance of the assessments undertaken by the DPP in practice, a random sample of 25% of summative assessments is selected for a tripartite meeting between the personal tutor, DPP and student at which the portfolio is available for review and discussion.

The assessment strategy is focused on the student demonstrating safe and effective prescribing practice. Where possible, students have access to any reference sources they would be able to use in practice. The pharmacology examination thus allows students to use the British National Formulary. Similarly, the numeracy assessment permits the use of a calculator.

Students are required to complete all assessments successfully, with one resit opportunity for each (except the numeracy assessment, for which 3 attempts are permitted). Compensation between different elements of assessment is not permitted, so failure of any one component means the student must retake the course. It is made clear to students from beginning that they will fail if there are any instances of unsafe practice.

The team asked for further details of the OSCE and was told that it consists of three stations:

1. The student talking the examiner through the process they would go through to reach the diagnosis.
2. With a different examiner, reaching a shared decision with the patient about their medication. Students are also expected to give non-pharmacological advice at this station, demonstrating their understanding of the role of the wider healthcare team.
3. Writing the prescription.

Staff from across the School are involved in the design of the OSCE for each student according to their areas of expertise. This ensures parity accuracy and validity. Red flags are identified in advance and made known to the examiner.

During the pandemic, the OSCE is being carried out online via MS Teams. Stations one and two take place with the same examiner and the prescription-writing station has been removed and is now assessed in the portfolio. The other assessments have also been moved online in response to the pandemic. Student activity during the exams are monitored, for example to look for evidence of time away from the screen. Markers also look for evidence of collusion, such as identical incorrect answers.

Students are encouraged to submit sources of evidence from within their Portfolio of Practice Evidence for written formative feedback and also receive formative feedback on a 250-word sample of their essay.

Standard 8 - Support and the learning experience

The team was satisfied that all four criteria relating the support and the learning experience will be met.

A comprehensive induction is provided for students which fully outlines the programme and its requirements, including those for supervised practice. Supervision and support are provided by the Course Lead, Personal tutor and DPP. A monthly meeting must take place between the student and their DPP, with a written record in the portfolio. Meetings with the personal tutor are recorded within the electronic student record. Meetings take place in person, where circumstances allow, although are currently being held by video due to the pandemic. In the survey responses reviewed by the team, students confirmed that the course team was responsive and that support and guidance were available when required.

Any concerns that the student has about their DPP are raised with the personal tutor in the first instance. The tutor will liaise with the DPP to agree an action plan, or will involve the Course Lead if this is not possible.

The programme team have considered the concept of assessment equivalence in the design of assessments to ensure an appropriate and realistic assessment workload for students. Templates provided for the recording of evidence within the portfolio allow a readily available structure for the student's discussion.

Attendance at face-to-face and online teaching sessions is monitored and any concerns are addressed by the personal tutor.

All members of the programme team and DPPs are made aware of the GPhC's guidance on tutoring for pharmacists and pharmacy technicians in their work.

Standard 9 - Designated prescribing practitioners

The team was satisfied that all five criteria relating to the designated prescribing practitioners will be met.

Appropriate mechanisms are in place via the application process to ensure that designated prescribing practitioners meet the requirements of the role. All DPPs are invited to a half-day DPP induction session (currently held virtually). The role of the independent prescriber and the nature and delivery of the programme are explored. DPPs are informed about their role and responsibilities in the support and assessment of students and are supported in examining best practice in relation to assessment and feedback, including the raising of concerns with students and the University. The sessions are interactive, enabling the sharing of different perspectives and experiences. Any DPPs unable to attend this session are provided with the information via alternative means. On-going support for DPPs is provided by the personal tutor.

The provider will expect all DPPs to have prior experience of supporting learning in practice. Nonetheless, the provider recognises that DPPs may need more support than DMPs, particularly with assessment.

All DPPs will be given feedback on their performance. This will be provided after the final exam board for their student and will be in the form of generalised feedback to all DPPs in the cohort. The provider had intended to provide this feedback only from the point at which DPPs are

involved in supervision, but the team informed the provider that the criteria must apply to the next cohort of students.