



Initial education and training standards for pharmacists: criteria for registering provisionally

Introduction

On 26 March 2020, we announced that the registration assessments scheduled for June and September had been postponed due to the Government restrictions on public gatherings and requirement for social distancing caused by the coronavirus pandemic.

Due to the delay before a rescheduled assessment could take place, we said we would consider a form of provisional registration so that pre-registration trainees could begin working from August as they had planned to do.

Legislative framework

Article 4(3)(e) of the Pharmacy Order 2010 ('the Order') states that one of the Council's principal functions is to set standards and requirements in respect of the education, training, acquisition of experience and continual professional development that it is necessary for pharmacists and pharmacy technicians to achieve in order to be entered in the Register.

Article 7 of the Order states that the Council must set the standards that are to be met in connection with the carrying on of a retail pharmacy business at a registered pharmacy.

Articles 20 and 21 of the Order set out the requirements for pharmacists and pharmacy technicians to gain entry to the Register and for the pre-entry requirements in respect of qualifications and additional education, training and experience.

Under Article 42 of the Order, the Council must 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 of the Register (pharmacists) or Part 2 (pharmacy technicians).

Under Article 48 of the Order, the Council must set standards relating to the conduct, ethics and performance expected of registrants.

Policy purpose

The purpose of this policy is to amend the criteria for registering as a pharmacist for a time-limited period in order to allow pre-registration trainees who have been unable to sit the registration assessment and who meet specific requirements to be provisionally entered on Part 1 of the register.

Policy statement

Our approach is based on the following principles, which are to:

- maintain standards for entry to the register to protect patient safety and the quality of care given to patients and the public both now and over the long term
- support the NHS and community pharmacy by strengthening the workforce at this critical time
- minimise blockages or gaps in the pipeline for qualified new registrants to join the profession in 2020 and in coming years too
- safeguard the welfare of students and trainees whilst also ensuring that their hard work, and that of their tutors, over many years is given suitable recognition at this key stage in their professional lives
- enhance the transition from trainee to pharmacist by strengthening the framework of support in their initial period of work

Eligibility criteria for registration

The following requirements for applying to provisionally register as a pharmacist apply from 1 July 2020 until 1 July 2021. During this period, individuals must sit the registration assessment at the first opportunity if they are fit to do so and must pass the registration assessment in order to renew their registration upon expiry of the 12-month period of provisional registration. Any individual who fails the registration assessment will not be eligible to remain on the register. They will need to sit and pass the registration assessment at a future date in order to return to the register.

Individuals must have:

- been awarded a GPhC-accredited Master of Pharmacy (MPharm) degree or Overseas Pharmacists' Assessment Programme (OSPAP)
- successfully completed 52 weeks pre-registration training in **2019** or 2020
- not previously failed the registration assessment
- self-declared that they are fit to practise as a pharmacist; that they have read and understood the parameters within which they must practise if their application is successful; an undertaking to do so

Any fitness to practise matters disclosed or brought to the attention of the GPhC have been investigated and resolved and the individual is fit to practise.

Tutor declaration

Individuals must also have received a final declaration from their tutor confirming they have met all 76 performance standards and that they are not subject to current fitness to practise proceedings. The declaration must include a statement from the tutor that they believe the trainee is safe to be registered provisionally; and that the trainee has demonstrated behaviours which indicate they could meet the standards for pharmacy professionals once registered, including using their professional judgement and speaking up when they have concerns or when things go wrong (standards 5 and 8 of the standards for pharmacy professionals).

The declaration from the tutor must include confirmation that they have obtained the views of a named second registrant or other healthcare professional who has either: overseen their training as a Superintendent Pharmacist, Chief Pharmacist; been involved in the quality assurance of their training as a member of an education and training organisation; or worked with the trainee as a member of the pharmacy or hospital team and who has confirmed they have not seen any behaviours or practice which would prevent the individual meeting the standards for pharmacy professionals.

Employers

Employers must complete a risk assessment (referred to below) before a provisionally registered pharmacist starts work.

Practising as a provisionally registered pharmacist

Persons who are registered provisionally must not work as a locum pharmacist, by which we mean they must not work on a self-employed basis, or only have a contract or agreement in place with a locum agency. The provisional registration scheme is intended to ensure that all provisionally registered pharmacists will be employed directly by the organisation or business in which they are working.

Persons must practise under the guidance and direction of a senior pharmacist¹. Individuals who are provisionally registered are not eligible to be a Superintendent Pharmacist or Chief Pharmacist. They may operate as the Responsible Pharmacist. The requirements set out below apply to all persons registered provisionally and both the patient safety and support requirements are mandatory.

We will issue standards for employers which will set out the framework in which pharmacists who are registered provisionally must operate. This will include information about the structured support that must be in place and the requirements that must be fulfilled when considering the location in which they will practise and the responsibilities they will be expected to undertake. In particular, the standards must include:

Patient safety requirements

Guidance and direction of a senior pharmacist

Persons who are registered provisionally must have a contract of employment with the organisation or business in which they are practising.

They may only practise within an organisation which has either a Superintendent pharmacist or a Chief Pharmacist or is owned by a pharmacist.

¹A provisionally registered pharmacist may work in a primary care setting where there is no Superintendent or Chief Pharmacist provided that the organisation employs a senior clinician who is a registered healthcare professional (for example a Primary Care Network clinical director or GP partner) responsible for the safe delivery of services. The organisation must also employ a senior pharmacist with at least two years' experience in the sector to provide guidance and direction to the provisionally registered pharmacist and must provide a named clinical supervisor in the workplace (who may also be the senior pharmacist). The senior pharmacist must complete the required risk assessment with the senior clinician, unless the Clinical Director or GP Partner is also a senior pharmacist.

Provisionally registered persons must practise only under the guidance and direction of a senior pharmacist.

The senior pharmacist must be either:

- the owner of the registered pharmacy (in the context of a registered pharmacy owned by an individual pharmacist), or
- the Superintendent Pharmacist or Chief Pharmacist, or
- a pharmacist with at least two years' experience and who has been nominated by the Superintendent or Chief Pharmacist.

The senior pharmacist must be available to be contacted by the provisionally-registered pharmacist to provide guidance and direction to them. The senior pharmacist must provide reports to the Council on demand on the provisionally registered pharmacist's conduct and performance. The senior pharmacist must also conduct a review at least monthly of the risk assessment mentioned below and update it no less frequently.

Risk assessment

Before the provisionally registered pharmacist begins working, the pharmacy owner or Superintendent Pharmacist or Chief Pharmacist (as relevant) must carry out (or cause to be carried out) a risk assessment to take account of:

- the registrant's experience and portfolio of learning, particularly the sector(s) in which they undertook their pre-registration training, and any information provided by the tutor;
- the nature and volume of services carried out in the locations where the registrant will practise
- the number and qualifications of other members of the pharmacy team.

Additional support requirements

Provision for study time prior to the registration assessment.

Signposting to relevant programmes and training provided by professional bodies and education providers, including the availability of a mentor, so the provisionally-registered pharmacist can consider what programmes and training may be appropriate and useful for them.

The registration assessment

Individuals who are registered provisionally as pharmacists will not be eligible to renew their registration with the GPhC upon the expiry of the 12- month period of provisional registration unless they have sat and passed the registration assessment within the 12 months of provisional registration.

The GPhC will not extend the period of provisional registration.

Subject to the outcome of a procurement exercise, the registration assessment will be delivered online as soon as is practicable, taking account of the necessary technical, security, accessibility and content issues. This reflects the current Government requirements in relation to social distancing and large gatherings and takes account of the possibility of such requirements either continuing or being re-imposed later. Further information will be provided once the procurement is complete and individuals will be given a minimum of 2 months' notice of the date for the assessment.

Standards

All persons registered provisionally will be required to meet the standards for pharmacy professionals. As part of this, they will be required to work within their areas of competence and make clear to their employer if there are specific tasks or practices that they do not feel competent to undertake.

Any fitness to practise concern about a person who is registered provisionally will be investigated in line with the published organisational policy, with account taken of the context in which the person is working.

Implementation of policy

We will provide guidance to employers, tutors and pre-registration trainees in June 2020 so that those wishing to apply to be registered provisionally can do so from July 2020 and take up employment thereafter.

GPhC

May 2020 (updated July 2020)