Interim policy on minimum training requirements for unregistered pharmacy staff – September 2018

Introduction

1.0 Introduction
1.1 It is a requirement of the standards for pharmacy professionals (May 2017) that pharmacy professionals (standard 9) delegate tasks only to people who are competent and appropriately trained or are in training, and exercise proper oversight. In addition, the standards for registered pharmacies (Revised June 2018) require that staff to have the appropriate skills, qualifications and competence for their role (and the tasks they carry out), or that they are working under the supervision of another person while they are in training.

2.0 Purpose of policy
2.1 Under Schedule 1 Article 6(2) of the Pharmacy Order 2010, the Council may make from time to time, or publish in such manner as it sees fit, guidance to registrants, employers and such other persons as it considers appropriate in respect to standards for the education, training, supervision and performance of persons who are not registrants but who provide services in connection with those provided by registrants.

2.2 The purpose of this policy is to set out minimum training requirements for unregistered pharmacy staff, so that pharmacy professionals delegate the tasks set out in this policy to pharmacy assistants and medicines counter assistants with the appropriate knowledge and skills.

3.0 Policy statement

3.1 Medicines counter assistants

The requirement is that courses should cover the working knowledge associated with unit 5 (SFHPHARM07) and unit 15 (SFHPHARM32) of the Pharmacy National Occupational Standards (NOS) at RQF level 2 / SCQF level 5 or equivalent. RQF, entitled:

- Unit 4: Provide advice on non-prescribed medicines and products (unit 4)
- Receive prescriptions (unit 5)
- Assist in the issuing of prescribed items (unit 15)

Unregistered pharmacy staff must be enrolled on a training programme within three months of commencing their role (or as soon as practical within local training arrangements) and the programme must be completed within a three-year time period.
3.2 Dispensing / pharmacy assistants

Pharmacy Service Skills NVQ level 2 (RQF) qualification or undertaking training towards this. This applies to staff working in the following areas:

- Sale of over the counter medicines and the provision of information to customers on symptoms and products
- Prescription receipt and collection
- The assembly of prescribed items (including the generation of labels)
- Ordering, receiving and storing pharmaceutical stock
- The supply of pharmaceutical stock
- Preparation for the manufacture of pharmaceutical products (including aseptic products)
- Manufacture and assembly of medicinal products (including aseptic products)

The requirement can be met by completing a training programme relevant to the job role and there are four acceptable ways of doing this:

- Successful achievement of Pharmacy Service Skills NVQ level 2 (RQF)
- Successful achievement of relevant units of the Pharmacy Service Skills NVQ level 2 (RQF)
- Successful achievement of a training programme accredited by the GPhC to be of an equivalent level to Pharmacy Service Skills NVQ level 2 (RQF)
- Successful achievement of relevant units of a GPhC accredited training programme of an equivalent level to Pharmacy Service Skills NVQ level 2 (RQF)

Unregistered pharmacy staff must be enrolled on a training programme within three months of commencing their role (or as soon as practical within local training arrangements) and the programme must be completed within a three-year time period.

3.3 Exemptions to minimum training requirements

The following staff are exempt from the need to undertake the training detailed above:

- Pre-registration trainee pharmacists.
- Students currently studying on an MPharm degree.
- Students currently studying on an Overseas Pharmacists’ Assessment Programme (OSPAP).
• Unregistered pharmacy staff who qualified prior to January 2005 and who were declared competent under the grandparenting clause to meet the knowledge and understanding associated with one or more units of the S/NVQ level 2 Pharmacy Services. *Exemption applies only to those of areas of work in which the supervising pharmacist declared the Assistant competent. NB should the Assistant’s role or place of work have changed; additional training may be required.*

• Unregistered pharmacy staff who hold one of the qualifications listed in Appendix 1 on or before 30 June 2011.

It is the pharmacy professionals’ responsibility to delegate tasks to appropriately trained staff and the owner’s responsibility to make sure all staff have appropriate skills, qualifications and competence for their role and the tasks they carry out. To ensure unregistered pharmacy staff members knowledge and understanding remain up to date, it may be necessary that an Assistant who either, holds a qualification completed a significant time ago, or has taken a prolonged break from the role; undertakes relevant units of an approved training course.

4.0 Application of policy

4.1 We will recognise and approve qualifications and training programmes to meet the minimum training requirements and make a list of these publicly available.

4.2 We will inform pharmacy professionals and registered pharmacies of their obligations under this policy.

4.3 We will enforce this policy through our fitness to practise process and take appropriate action against registrants who fail to comply with this policy.

5.0 Measurement and evaluation

5.1 We will gather information on this policy through

- Feedback from Inspectors’ visits,
- Complaints made against registrants related to this policy,
- The results of fitness to practise cases related to this policy,
- Enquiries made by registrants and others about this policy, and
- Feedback from pharmacy training providers.

5.2 This information will be reviewed on an ongoing basis and evaluated when the policy is reviewed.
Appendix 1

Qualifications

- BTEC National Certificate in Pharmaceutical Sciences
- BTEC National Certificate in Science (pharmaceutical)
- BTEC National Certificate in Applied Science (pharmaceutical)
- BTEC National Certificate in Pharmacy Services
- City & Guilds of London Institute, Dispensing Technicians Certificate
- Certificate of the Society of Apothecaries
- Boots 2-year dispenser training programme completed prior to 1993
- Boots 1 year dispensing assistants’ course completed after 1993 but before 7 March 2005 plus an accredited top-up training module and assessment of competence
- Dispensing Certificate of the Royal Army Medical Corps or the Royal Air Force
- NPA 2-year Dispensing Technicians correspondence course completed prior to 1998
- NVQ level 3 Pharmacy Services (City & Guilds)
- NVQ level 3 Pharmacy Services (Edexcel)
- SANCAD Pharmacy Technicians Certificate (2 year)
- SCOTEC National Certificate in Pharmaceutical Science
- SCOTEC Pharmacy Technicians Certificate (2 year)
- SCOTVEC National Certificate in Pharmaceutical Science
- SQA National Certificate in Pharmaceutical Science
- SVQ level 3 Pharmacy Services (Scottish Qualifications Authority