



Independent
prescribing
programme

The Open University
Report of a monitoring event
June 2020

Event summary and conclusions

Provider	The Open University
Course	Independent prescribing programme
Event type	Monitoring event
Event date	11 June 2020
Accreditation period	December 2018 – December 2021
Outcome	Full accreditation confirmed. The accreditation team agreed to recommend to the Registrar of the General Pharmaceutical Council (GPhC) that the Open University should be fully accredited as a provider of a pharmacist independent prescribing programme for the remainder of the accreditation period.
Conditions	There were no conditions
Standing conditions	Please refer to Appendix 1
Recommendations	No recommendations were made
Registrar decision	The Registrar of the GPhC accepted the team's recommendation and approved full accreditation of the programme for the remainder of the accreditation period.
Key contact (provider)	Alison Hill - Senior Lecturer Non-Medical Prescribing, Pharmacy Lead
Accreditation team	Professor Angela Alexander, Professor Emerita of Pharmacy Education, University of Reading (chair) Mike Pettit, Retired Senior Lecturer in Pharmacy Practice, University of Sussex
GPhC representative	Chris McKendrick, Quality Assurance Officer, GPhC
Rapporteur	Chris McKendrick, 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 accreditation process is based on the GPhC's 2010 accreditation criteria for Independent Prescribing.

The GPhC's right to check the standards of pharmacy qualifications leading to annotation and registration as a pharmacist 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>

Purpose of this event

The purpose of the monitoring event is to review the performance of the programme against the education and training standards with the first cohort of pharmacists and to ensure that delivery is consistent with the GPhC accreditation criteria. The monitoring event utilises student feedback and evaluation together with a review of documentation and a meeting with programme representatives. The accreditation period which was provisionally granted at the initial accreditation event is confirmed after a satisfactory monitoring event has taken place.

Background

The Open University was provisionally accredited by the GPhC in December 2018 to provide a programme to train pharmacist independent prescribers, for a period of 3 years. In line with the GPhC's process for accreditation of independent prescribing programmes, an event was scheduled for June 2020 to review the programme's suitability for full accreditation. There was a delay to the planned first cohort of students that were due to start the programme in February 2019 due to the HCPC approval process having not been finalised until the end of January 2019. This left the Open University with insufficient time to enrol students for the February 2019 cohort. The first cohort commenced in August 2019 and completed the programme in March 2020 with the module results released in April 2020. Of the 27 students who undertook the programme, 7 were pharmacists.

Documentation

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

The event

The event was held on 11th June 2020. Due to Covid-19, the event was held via teleconference and comprised of meetings between the GPhC accreditation team and staff. Student surveys sent by the GPhC prior to the event were reviewed by the team at the event.

Declarations of interest

There were no declarations of interest

Key findings

Section 1: The programme provider

The team was satisfied that all the four criteria relating to the programme provider continue to be met (See Appendix 2 for criteria)

The programme continues to remain validated by the Open University. The first cohort of 27 students (enrolled August 2019) which included 7 pharmacists, had successfully completed and passed the programme at the time of this monitoring event.

The second cohort of 36 students commenced in February 2020. It was noted by the accreditation team that as much of the programmes material and assessments are already delivered online, modifications

due to COVID-19 have been minimal. Campus delivery days during the lockdown period are being delivered online which include the clinical skills assessment theory. The provider is planning to deliver face-to-face clinical skills practical teaching post lockdown but are closely monitoring the situation.

It was noted that one of the most significant changes has been to the programme lead whom has changed three times since the original accreditation event. The provider assured the team that there have been appropriate handovers each time.

The team questioned the feedback rate from students which appeared to be low in comparison to other providers. The provider explained that informal feedback is elicited through tutor engagement and within synchronous forums with students during the course. The provider acknowledged that more could be done to formalise feedback and that two weeks prior to the event the programme elicited feedback at the midway point of the current cohort. It was explained that two things impacted the feedback. One, the evaluation went out in March 2020 when COVID-19 became the priority. Two, the feedback request went out centrally from the university separately to the module team. Moving forward, the provider aims to align feedback to make sure that it is captured during the study days at the university. It was noted that feedback is anonymous, so the student's profession is unknown.

The provider confirmed that the external examiner is fully briefed on the GPhC independent prescribing learning outcomes for pharmacists. It was noted that the external examiner reported problems with preview of the assessments and access to material. The provider confirmed that these issues have all been resolved and the external examiner can now access all materials and is involved in the development of assessments.

The programme provider confirmed that the staffing resource on the programme continues to remain satisfactory. As the programme numbers increase, the programme team will increase to ensure that the programme remains well staffed. The programme is looking to recruit a third tutor by November 2020.

Section 2: Pre-requisites for entry

The team was satisfied that all the six criteria relating to the pre-requisites for entry continue to be met, with one minor amendment identified

The team noted that the university Central Admissions continues to check applicants' registrations against the GPhC register. The details are scrutinised and verified by the Programme Lead through discussion with the DMP and NMP lead (or equivalent) before the entrant can be enrolled onto the programme. The programme provider confirmed that the pre-requisites for entry remain the same as noted at the previous event.

It was noted during the previous accreditation event that the module handbook should be amended to read "...pharmacist can apply for annotation on the GPhC register" and not registration. Additionally, statements in the documentation were to be amended to correctly refer to the GPhC as a the regulatory not professional body and documents to be amended to include the Pharmaceutical Society of Northern Ireland (PSNI) in addition to the GPhC in all locations. The accreditation team was satisfied that these amendments had been made.

The team noted one minor amendment which is needed to the module specification. The specification should include reference to experience 'following pre-registration year' and reference to 'UK experience'.

Section 3: The programme

The team was satisfied that all the eight criteria relating to the programme continue to be met

The programme continues to remain validated by the university and is taught at RQF level 7 and is made up of 60 credits.

The accreditation team noted that the module team consists of two central academics (0.4 WTE

Pharmacist and 1 WTE Nurse). This is supplemented with the support of a fulltime lecturer in Biomedical Sciences, an NMC-registered mental health nurse, an NMC registered midwife, and a fulltime lecturer in health and law. Within the wider Advanced Clinical Practice team there are a further 3 Non-Medical Prescribers (NMP) who support the core team.

The delivery of the programme is currently through central academics, based at the Milton Keynes Campus. However, should the numbers of students increase, there are a pool of Associate Lecturers who are practitioners or academics and will be employed to deliver the content at sites throughout the UK. Practice Teachers will also be employed to support students in practice. Resources will increase as student numbers increase and this will be across the four nations to support the programme as it grows and expands to other geographical areas. The accreditation team noted the planned utilisation of additional teaching sites around the UK to support regional teaching dependent on future student numbers. New sites should be notified to the GPhC via the change request form which can be found on the GPhC website.

It was noted that the programme has added the use of clinicalskills.net as a resource to support the underpinning knowledge and classroom teaching of clinical skills for the second cohort onwards. The accreditation team questioned the relevance and reliability of delivering clinical skills online. The provider explained that so far it seems to have gone well and plans to supplement this by using virtual reality going forward. The website clinicalskills.net provides the theory and some students have the opportunity to practise within their clinical environment. It was acknowledged by the provider that the situation is not ideal given the COVID-19 pandemic. Further, it was explained that some students may need extensions to meet their learning needs as per the learning contract in relation to clinical skills. The development of virtual reality for students to practise with is going well and the programme team are hopeful it will be ready by the end of the year. The plan is that after COVID-19 there will be face-to-face and blended learning, enhanced online by the use of virtual reality, but it was noted that this cannot be done in isolation without real practice.

The programme is currently being delivered online using a package called adobe connect and the programme team can monitor engagement and attendance. The accreditation team questioned the process for flagging attendance or engagement issues with students. The provider explained that records are kept and reviewed regularly, should a problem be identified such as a missed session, the programme team would look to arrange another session or additional teaching for the student. However, this is decided on a case-by-case basis and reasons for missing sessions must be justified. Should they not be, the programme team may suggest deferral or withdraw depending on circumstances.

Based on the current and planned resourcing of the programme, the team was assured that the programme would be able to support an increase in student numbers and cohorts.

Section 4: Learning in Practice

The team was satisfied that all the five criteria relating to learning in practice are met

It was noted that pre COVID-19, clinical skills were taught and assessed in the face-to-face sessions. Clinical skills assessed on campus included the assessment of vital signs, blood pressure and respiratory examination, which included inspection, palpation, percussion and auscultation. Clinical skills teaching is timetabled on campus day 2 (week 7) by an experienced Nurse Senior Lecturer and Associate Nurse and Paramedic Lecturers who also work in practice, consolidated on campus day 3 (week 12) and assessed on campus day 4 (week 17) with a resit opportunity on a subsequent date. The university has invested in clinical equipment which is available for loan to students who do not have access to suitable equipment to practice.

As noted under section 3 of this record, the provider also gives students access to clinicalskills.net in between face to face teaching days. This has been utilised by students extensively during the COVID-19 until face to face teaching can recommence. Students are also supported in practice by their

organisation and this is made clear in the organisation and DMP responsibilities documents.

Clear demarcation is made between clinical skills training provided during the face-to-face days and any individual clinical skills required in practice which are identified as part of the learning needs assessment with individual DMPs.

The provider confirmed that contact with the DMP is made at application to ensure they understand the requirements of the role. The accreditation team questioned if the provider still required the DMP to sign off that the 'pharmacist has satisfactorily completed at least 12x7.5h days supervised practice'. The provider confirmed that this is contained within the practice log which the DMP signs both at the mid-point and at the end to confirm the 12x7.5h requirement.

Section 5: Assessment

The team was satisfied that all the four criteria relating to assessment continue to be met

It was noted that the primary assessment has been modified slightly since the previous event. However, future modifications, in part due to COVID-19, to assessments were discussed at the event and approved by the accreditation team.

These include the following modifications to assessments:

- changing the practice-based assessment to a consultation OSCE station
- changing prescription writing, clinical skills assessment and practice-based assessment to a multi station face-to-face OSCE
- considering changing classroom examinations to online examinations with online invigilation

The accreditation team explored the rationale around the proposed changes. The provider explained that changes to the practice assessment was decided after feedback from students stating that it was challenging due to GDPR and consent from patients. The provider also acknowledged that reviewing the audio files was challenging due to the file sizes being very large. The plan is to undertake a similar exercise on campus (1 multi-station OSCE), what this might look like in a COVID-19 environment is still unknown.

Clinical skills haven't been undertaken with the second cohort of students yet and had been pushed back to August 2020 - it is now planned for January 2021. Consultation skills and history taking are currently being undertaken online, using scenarios, and is recorded so the moderator and external examiner can view it. Prescriptions can be uploaded to the assessment site and marked electronically.

Currently the programme is utilising a presentation around clinical skills where students are asked questions so they will understand the process. Moving forward, the provider hopes to enhance the presentation to include bad/unsafe practice e.g. by showing a video where physical examination isn't done well, this may also be extended to have DMP involvement.

At the time of submission there were six students who hadn't passed the course, of whom three were pharmacists. The provider confirmed that at the time of the event all had passed.

It was noted that due to the implementation of COVID-19 lockdown the external examiner was not able to receive examples of completed assessment papers (pharmacology and clinical skills assessment) which are secured at the university campus. The external examiner was, however, able to comment on the papers themselves and had seen the marking criteria. Overall, it was noted that the external examiner was satisfied with the marking process and access issues have been resolved moving into the second cohort.

The accreditation team enquired about the pharmacology and numeracy exams being moved online and how the provider will ensure validity and reliability. The provider has created a question bank for the numeracy exam with a minimum of five questions per category. Students, at the time of exam, will all get

slightly different questions, and this will add to the reliability of the exam. Adobe connect allows for online invigilation which will be utilised for the online exams. The pharmacology question bank has not been written yet and the mock questions for both the numeracy and pharmacology are not related to the bank of questions used for the exam.

The team questioned how 'dangerous'/unsafe practice was identified and how the provider ensured consistency between judgements. The provider explained that dangerous equals unsafe practice and that they are one of the same. The provider will move to using a risk assessment matrix, red, amber, and green which will be benchmarked to ensure consistency. It was explained that concerns often arise in the case study with reactions, co-morbidities and lack of competency in a specific area. Concerns about dangerous/unsafe practice are covered by the university fitness to practice policy.

Section 6: Details of Award

The team was satisfied that both two criteria relating to details of the award continue to be met

The accreditation team was satisfied, based on the external examiners report, exam board minutes, and the transcript of results for the first cohort of pharmacy independent prescribing students, that graduates from the Open University had met the GPhC learning outcomes. Further the accreditation team was assured that 'Practice Certificates in Independent Prescribing' are being issued appropriately to the GPhC for the purposes of annotation. The provider was reminded to send a certified copy of the pass list to the Registrar of the GPhC, via the Applications Team, containing the names and registration numbers of the pharmacists who have successfully completed the programme.

Appendix 1 - Standing conditions

The following are standing conditions of accreditation and apply to all providers:

1. The record and report include other comments from the team, and providers are required to take all comments into account as part of the accreditation process. The provider must confirm to the GPhC that required amendments have been made.
2. The provider must respond to the definitive version of the record and report within three months of receipt. The summary report, along with the provider's response, will be published on the GPhC's website for the duration of the accreditation period.
3. The provider must seek approval from the GPhC for any substantial change (or proposed change) which is, or has the potential to be, material to the delivery of an accredited course. This includes, but is not limited to:
 - a. the content, structure or delivery of the accredited programme;
 - b. ownership or management structure of the institution;
 - c. resources and/or funding;
 - d. student numbers and/or admissions policy;
 - e. any existing partnership, licensing or franchise agreement;
 - f. staff associated with the programme.
4. The provider must make students and potential students aware that successful completion of an accredited course is not a guarantee of annotation or of future employment as a pharmacist independent prescriber.
5. The provider must make students and potential students aware of the existence and website address where they can view the GPhC's accreditation reports and the timescales for future accreditations.
6. Whenever required to do so by the GPhC, providers must give such information and assistance as the GPhC may reasonably require in connection with the exercise of its functions. Any information in relation to fulfilment of these standing conditions must be provided in a proactive and timely manner.

Appendix 2 – Accreditation criteria, learning outcomes and indicative content

GPhC accreditation criteria, learning outcomes and indicative content for pharmacist independent prescribing programmes

The accreditation criteria, learning outcomes and indicative content for pharmacist independent prescribing programmes can be downloaded from the GPhC website at:

<http://www.pharmacyregulation.org/education/approval-courses/accreditation-guidance>