

**University of the West of England  
independent prescribing course  
reaccreditation event report, February  
2022**



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## Event summary and conclusions

<b>Provider</b>	University of the West of England
<b>Course</b>	Independent prescribing course
<b>Event type</b>	Reaccreditation
<b>Event date</b>	07 February 2022
<b>Approval period</b>	June 2022 – June 2025
<b>Relevant standards</b>	<a href="#">GPhC education and training standards for pharmacist independent prescribers, January 2019</a>
<b>Outcome</b>	<p>Approval with conditions</p> <p>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 the West of England should be reaccredited for a further period of three years, subject to one condition.</p>
<b>Conditions</b>	<ol style="list-style-type: none"> <li>1. The option to allow 18 hours prior learning to be applied to the learning in practice element of the programme must be removed. All pharmacists must complete all 90 hours of learning in practice within the programme. This relates to criterion 6.1, and the minimum learning requirements stated within the standards.</li> </ol>
<b>Standing conditions</b>	The standing conditions of accreditation can be found <a href="#">here</a> .
<b>Recommendations</b>	No recommendations were made.
<b>Minor amendments</b>	<ul style="list-style-type: none"> <li>• To provide the option on the application form for the applicant and/or their designated prescribing practitioner to be registered with the Pharmaceutical Society of Northern Ireland (PSNI).</li> <li>• The programme documentation should be updated to reflect that it is not a GPhC requirement within the 2019 standards that the pharmacist fails the whole programme if they demonstrate unsafe practice in assessment (appendix 15 - module specification pages 4 and 11).</li> </ul>
<b>Registrar decision</b>	<p>Following the event, a response was received to address the condition of reaccreditation and the accreditation team agreed it was now met.</p> <p>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.</p>

<b>Maximum number of all students per cohort</b>	50
<b>Number of pharmacist students per cohort</b>	50
<b>Number of cohorts per academic year</b>	Up to 16
<b>Approved to use non-medical DPPs</b>	Yes
<b>Key contact (provider)</b>	Deborah Moreno-Chamorro
<b>Provider representatives</b>	Deborah Moreno-Chamorro, Independent Prescribing Lead Carole Irwin, School Portfolio Lead for Quality, Governance and Enhancement Dr Ilhem Berrou, Senior Lecturer Dr Alexandra Bowles, Senior Lecturer Dawn Oddie, Senior Lecturer Catherine Pigginn, Senior Lecturer Jill Wood, Senior Lecturer Claire Fullbrook-Scanlon, Senior Lecturer Sarah Gane, Senior Lecturer
<b>Accreditation team</b>	Professor Chris Langley (Team leader) Professor of Pharmacy Law & Practice and Head of the School of Pharmacy, Aston University; Deputy Dean, College of Health and Life Sciences Dr Brian Addison Academic Strategic Lead in Clinical Practice & MPharm Course Leader, Robert Gordon University Dr Cathy O'Sullivan, Workforce Development Consultant
<b>GPhC representative</b>	Philippa McSimpson, Quality Assurance Manager (Education), GPhC
<b>Rapporteur</b>	Niall Stewart-Kelcher, Senior Registration Assessment 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 standards for the education and training of pharmacist independent prescribers, January 2019.

The Pharmacy Order 2010 details the GPhC's mandate to check the standards of pharmacy qualifications leading to annotation as a pharmacist independent prescriber. 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/ukxi/2010/231/contents/made>

### Background

The University of the West of England 'the provider' was first accredited by the GPhC in 2016 to provide a course to train pharmacist independent prescribers, for a period of 3 years. At that time, UWE had been awarded a contract from Health Education England South West (HEESW) to deliver one multi-professional independent and supplementary prescribing programme across the South-West region. The programme was based in UWE's Department of Nursing and Midwifery which already ran an independent prescribing programme approved by the Nursing and Midwifery Council (NMC) and the Health and Care Professions Council (HCPC). The programme was delivered by UWE in partnership with the University of Bath (UoB) which delivers its own GPhC approved Pharmacist Prescribing Programme. Although working in partnership, the programme was wholly owned, and quality assured by UWE. The most recent reaccreditation event took place in 2019 where no conditions or recommendations were made, and the Registrar approved reaccreditation of the programme for a further period of 3 years. The accreditation team highlighted an area of strength of the partnership working between the University of the West of England and the University of Bath in developing a multi-professional course for delivery across the whole of the South-West region. In 2020 the GPhC afforded the ability to the provider the use Designated Prescribing Practitioners to support the programme. In line with the standards for the education and training of pharmacist independent prescribers January 2019, an event was scheduled on 07 February 2022 to review the course's suitability for reaccreditation.

### 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 an additional request for external examiners reports was made and received. The documentation was deemed to be satisfactory to provide a basis for discussion.

## The event

The reaccreditation event was held remotely by videoconference on 07 February 2022 and comprised of several meetings between the GPhC accreditation team and representatives of University of the West of England 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 none.

## Schedule

Meeting	Time
Private meeting of accreditation team and GPhC representatives, including break	09:30 - 11:00
Meeting with course provider representatives	11:00 - 12:30
Lunch	12:30 - 13:30
Learning outcomes testing session	13:30 - 14:00
Private meeting of the accreditation team and GPhC representatives	14:00 - 14:30
Deliver outcome to the provider	14:30 - 15:30

## Key findings - Part 1 - Learning outcomes

The team reviewed all 32 learning outcomes relating to the independent prescribing course. To gain additional assurance the team also tested a sample of **six** learning outcomes during the event was satisfied that **all 32 learning outcomes continue to be met** to a level as required by the GPhC standards.

The following learning outcomes were tested at the event: **2, 5, 13, 19, 28 and 31**

### Domain: Person centred care (outcomes 1-6)

Learning outcomes met/will be met? Yes  No

### Domain: Professionalism (outcomes 7-15)

Learning outcomes met/will be met? Yes  No

### Domain: Professional knowledge and skills (outcomes 16-26)

Learning outcomes met/will be met? Yes  No

### Domain: Collaboration (outcomes 27-32)

Learning outcomes met/will be met? Yes  No

## Key findings - Part 2 - Standards for pharmacist independent prescribing course providers

### Standard 1: Selection and entry requirements

Standard met/will be met? Yes  No

**The team was satisfied that all six criteria relating to the selection and entry requirements continue to be met. Criterion 1.1 requires a minor amendment.**

Applications to the course are made online, the provider noted that the programme application form had been redeveloped since the last reaccreditation event. The form is now split into three main sections to ensure requirements are checked separately, with minimum word counts to ensure sufficient information is provided by applicants. This change was made following feedback from course stakeholders.

The course lead reviews all applications, and, in their absence, there is a designated deputy, both have been trained in equality, diversity and inclusion and work to an agreed internal framework to ensure consistency when reviewing applications. All applications are tracked on a customer relationship management (CRM) system visible to the provider and applicant. The programme lead is supported by a wider team of practitioners, including pharmacists who help contextualise relevant pharmacist experience where necessary.

The programme application form states the expected experience of prospective students when applying to the course. All applicants must describe their experience, their area of practice and detail how they expect to complete the course requirements, this is then verified by their local independent prescribing lead and employer. If an applicant is self-employed a reference is required to verify the application.

The accreditation team confirmed that as part of the reaccreditation process a minor amendment to the programme application form is required to provide the option for the applicant and/or their designated prescribing practitioner (DPP) to be registered with the Pharmaceutical Society of Northern Ireland (PSNI) in line with criterion 1.1. This will allow the provider to check that the pharmacist is in good standing with both regulators, where dual registration is held.

Where an application is rejected, the reasons for rejection are mapped to the entry criteria and feedback is provided to the applicant in writing, in addition all rejected applications are offered a telephone follow up to discuss the reasons for rejection and where improvements are needed for future applications. Themes of rejected applications are collated by the programme lead and shared with stakeholders at periodic local workforce meetings.

### Standard 2: Equality, diversity and inclusion

Standard met/will be met? Yes  No

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

The accreditation team was satisfied that there are appropriate policies and strategies relating to equality and diversity in place at university and course level to make sure consideration is given to

equality, diversity, and inclusion throughout the course. The provider outlined assurances that all staff members on the course undertake regular equality and diversity training and are supported by inclusivity curriculum toolkits.

The team noted that the course provider asks applicants on the programme application form to disclose any disabilities and that this early identification allows these applicants to be signposted to the university disability services, to consider both academic and practice environments.

Students are prepared for working in diverse communities during the course, within the health inequalities and beliefs formative essay, where students explore wider influences which may impact their future prescribing. The course provider made note that students are supported to consider equality and diversity in unique ways, including how to say their name in Makaton. Students are regularly signposted to additional reading and have access to extensive variety of resources during the course.

The course provider expects the number of pharmacists from ethnic minority backgrounds completing the course to increase, due to funding increases from NHS England to support community pharmacists to access the course.

The team were encouraged by analysis conducted by the course provider into the awarding gap and the impacts of the COVID-19 pandemic. It was found that the cohorts undertaking the course in 2019-2020 academic year performed worse than expected, but subsequent cohorts in the 2020-2021 academic year have performed comparatively to pre-pandemic cohorts.

The team noted positive student feedback and experience with the wider flexibility offered by online learning and managing their personal and professional responsibilities.

The team wished to understand the reasonable adjustments process further and to understand when reasonable adjustments have been made. The provider gave a recent example of a student who required a reasonable adjustment in their clinical and diagnostic skills OSCE assessment, and this was made in collaboration with the student, DPP and course provider. The team were interested in any examples of when a reasonable adjustment could not be made and the course provider explained that the University of the West of England have a university wide policy that all online exams are available over a 24-hour period, the provider clarified that they did not feel this was appropriate for this course and all online assessments within the course are available at specific times equally to all students.

The team noted the consideration that is given to teaching and learning to make materials accessible including presenting content in a variety of forms and in particular the support of digital inclusivity.

### Standard 3: Management, resources and capacity

Standard met/will be met? Yes  No

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

An educational audit is in place for this course which defines roles, responsibilities and learning agreements that are in place between the student, DPS, DPP and the provider.

The team sought clarification from the course provider on what their identified risks are and what migration has been put in place. The course provider explained that maintaining the current staffing compliment, to be able to continue running 16 cohorts a year is their biggest risk. The provider has brought in past students from previous cohorts and IP leads to input to programme delivery to build up contacts so that there is mitigation against staff absence and helping to create variety in the programme. The shift to mostly online teaching has reduced the risk if staff absences were to happen. The provider also confirmed that their whole time equivalent (WTE) is now 11.4 an increase from 9.4 when they were last reaccredited, which was a previous suggestion from the accreditation team. The team are satisfied that this increase in staff now puts the provider in a position to deliver the course and support students for up to 16 cohorts per year.

The team wanted further information on the University's policy of uncapped resits, the provider explained that this doesn't allow students to re-take the assessments within the course an unlimited number of times. This policy allows students to delay the ending of their course and carry forward the previous marks obtained in assessments already completed. This has been a beneficial change since COVID-19 and has assisted students who experienced re-deployment due to COVID-19 in the workplace and students who faced parental and carer challenges because of the pandemic.

Due to the course being delivered across multiple professions, the team sought assurances on how the needs of pharmacists are met through support and guidance from the programme staff. The provider outlined that specific profession review sessions are held throughout the course and that it was identified through these that the pharmacists often required more support around clinical diagnostic and examination skills. From this feedback, extra support to pharmacists on clinical diagnostic and examination skills has been built into the programme. Pharmacists from across cohorts are encouraged by the provider to interact and share their experiences and learning.

#### Standard 4: Monitoring, review and evaluation

Standard met/will be met? Yes  No

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

The course is subject to all University Academic Regulations and Procedures and course level quality assurance and monitoring processes. All permanent members of staff are required to undertake the Academic Professional Programme run by the University of the West of England, which allows staff to develop the knowledge, skills, and behaviours of an academic professional.

The team enquired about feedback from external examiners and any examples of changes made to the course as a result. The provider explained that they have scrutiny panels with their external examiners, where a variety of students performance is reviewed, and suggestions made to the provider. Changes implemented as a result have included altering the pharmacology exam to be more orientated to clinical practice and making the BNF available during exams to reflect contemporary practice.

A new committee has been established as part of the university's academic governance structure following a risk and assurance review; the University Quality and Standards Sub-Committee (UQSSC). The team sought clarification on the responsibilities of this new committee, the provider explained that the course has now moved into a new School within the university and the UQSSC committee is

aligned to the Board of Examiners' processes and covers all learning and assessments across all locations and for this course includes learning and assessment from student's time in practice.

The provider through a diverse multi-disciplinary team has continually updated the course to reflect changes within practice, most recently with the incorporation of remote consultations and how to conduct these safely and effectively.

In 2021 the provider conducted a deep dive into student feedback through an anonymous evaluation and carried out follow-up interviews with students to identify areas for improvement. Several changes to the course were made because of this, for example complete examples of student's journeys made available and the availability of a series of optional consultation skills practice sessions for pharmacist students.

The module specification stipulates that assessments are non-compensatory and that all must be passed to enable annotation as an independent prescriber. Students are made aware of this within the programme application form, the module specification and within the module handbook. It is also reiterated on day one of the programme.

## Standard 5: Course design and delivery

Standard met/will be met? Yes  No

**The team was satisfied that all ten criteria relating to the selection and entry requirements continue to be met. Criterion 5.9 requires a minor amendment.**

The team was satisfied that the course design and delivery was appropriate and would support pharmacists to achieve the learning outcomes. There are opportunities for pharmacists in practice from stakeholders and pharmacist students to feedback and feed into the continuous development of the pharmacist elements of the course. In addition, there are practicing pharmacist independent prescribers working on the course and delivering taught content. A recent addition to the course is a larger focus on deprescribing, which was implemented after feedback from pharmacists.

The team wanted to understand how the provider manages concerns relating to the learning in practice elements of the course, the provider explained that any member of the tri-partite relationship can raise concerns. The most common point a concern is raised is during the mid-point review and relates to completing an acceptable number of hours in practise. The course provider works with students, their DPP and employers to create a management plan with agreed timelines. Students and their DPP are given information on how to manage the complexities of being a part-time student and a regulated professional to safeguard the public during their supervised 90 hours of time in practice. DPPs are given specific training on their roles and responsibilities and the required quality assurance to the practice learning and environments students will complete their supervised practice in.

The course provider confirmed that there has been no fitness to practise concerns involving a pharmacy student since their last reaccreditation.

The team understand that because of the pandemic delivery has moved to predominately online, with face-to-face sessions still available and opportunities for pharmacists to practice clinical diagnostic and consultation skills in person. Students can network virtually in multi-profession coffee breaks and via online forums.

The programme documentation should be updated to reflect that it is not a GPhC requirement within the 2019 standards for pharmacy professionals that the pharmacist fails the whole programme if they demonstrate unsafe practice in an assessment (appendix 15 - module specification pages 4 and 11), in line with criterion 5.9.

## Standard 6: Learning in practice

Standard met/will be met? Yes  No

**The team was satisfied that four of the five criteria relating to the learning in practice will be met or continue to be met. Criterion, 6.1 is subject to a condition.**

It is a requirement of the application process that the student confirms a clinical need to undertake the prescribing programme and that there are patient facing opportunities in place under the supervision of a DPP. The student and the DPP agree and complete a learning contract at the start of the period of learning in practice, and this must be placed in the student's portfolio and shared with the provider. The student's DPP has oversight of the hours in practice and this responsibility is reinforced at the programme application stage, DPP training and in the DPP handbook. This does not constitute direct personal supervision of all 90 hours by the DPP, but the provider recommends a minimum of 20 hours is supervised by the DPP. During the COVID-19 pandemic, some students have utilised virtual and remote consultations into their time in practice.

The team wished to confirm that all pharmacists must undertake 90 hours of learning in practice as part of the programme. The course provider explained that they wish to allow pharmacists to use up to 18 hours from previous experience and learning from before they started the course to count towards the 90 hours. This arrangement is currently in place for other professional and it is up to the discretion of their DPP whether to accept this prior learning to count towards the 90 hours of practice. The accreditation agreed that this arrangement could not be used for pharmacists on the programme as the standards state that the programme must contain a minimum of 90 hours of learning in practice. The team agreed that it would be a condition of reaccreditation that the option to allow prior learning to be applied to the learning in practice element of the programme for pharmacists must be removed. All pharmacists must complete all 90 hours of learning in practice within the programme. This relates to criterion 6.1, and the minimum learning requirements stated within the standards that require the programme to contain at least 90 hours of practice, which is overseen, and quality assured by the HEI, who must also approve the DPP to act as supervisor during the time in practice.

## Standard 7: Assessment

Standard met/will be met? Yes  No

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

The assessment strategy for the course is to ensure equality of student experience and proficiency as an independent prescriber, regardless of profession or previous experience. The individual elements of the assessments are mandatory and must be completed and passed by all students. They are regularly updated to reflect any changes in legislation. The assessments include DPP confirmation of

successful completion of professional practice element, OSCE assessment, pharmacology assessment, numeracy assessment, SWOT analysis, health beliefs reflective essay, portfolio of evidence in relation to students own area of practice and their clinical practice algorithm in relation to students own area of practice. The course provider gives clear information on the purpose of assessment and feedback from assessments in line with the university assessment and feedback policy. There have been no changes to the assessment since reaccreditation in 2019.

Attendance at taught sessions is closely monitored and any absences are reported back to employers. The mid-point review requires an appraisal of the supervised hours completed by the student and any concerns are raised with the student, employer and DPP and an action plan is created with agreed timelines.

All course provider staff are registered as independent prescribers and make-up a diverse multi-professional team. It is the joint responsibility of the DPP and provider's academic assessor to determine whether the student has provided adequate evidence to meet each of the GPhC learning outcomes mapped to the RPS competencies. The OSCE assessment is broken down into three parts and students must pass all three to record an overall pass, to ensure consistency in marking templates have been created for the assessors to use and OSCEs are recorded for moderation purposes. The health beliefs reflective essay and clinical practice algorithm must be passed at a minimum mark of 50% in each, these are marked by the provider's academic assessors. The provider conducts a pre-marking exercise with assessors to help maintain consistency in the marking, all first marking is completed by a member of the course team and a sample is reviewed by the programme lead in a first moderation step. In line with the university's policy a sample of assessed work is second sample marked by an academic assessor and a sample of assessments are reviewed by the courses external examiners.

The provider supports students through feedback which is built into the course curriculum to develop students and help them progress and complete the course. Individual feedback and guidance on assessed work is provided to students, where feedback is relevant to all students, this is provided to students through webinars and on Blackboard. Feedback on student's time in practice is provided by their DPP and supervisors.

The external examiners evaluate all aspects of the course to ensure that the quality of the education is of the required academic level and is required to report to the course team on an annual basis.

## Standard 8: Support and the learning experience

Standard met/will be met? Yes  No

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

Students are provided with a course handbook and receive an induction on the first day of the course by a member of the course team.

Students are informed during induction that the cohort leader is the first point of contact if there are any issues in practice either in relation to the learning environment or the DPP. The provider has a

mandate to answer e-mail queries within 48 hours and students are advised of this. The programme lead is the point of escalation if a concern or issue has not been resolved by the cohort leader.

All DPPs must undertake the learning module 'supporting students in practice' and guidance is given to DPPs on their tutoring role, and this considers the GPhC guidance on tutoring.

## Standard 9: Designated prescribing practitioners

Standard met/will be met? Yes  No

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

At the application stage DPPs are required to confirm that they meet the role requirements including those within the RPS competency framework and these are reviewed by the programme lead where the DPPs registration status on the relevant professional register to make sure they have current registration and no restrictions on their practice.

In addition to completing the supporting student's module and review of the providers guidance, DPPs must complete a training via a video and have a one-to-one conversation with an academic assessor to ensure that they are aware of the specific learning outcomes required of students. All DPPs are assigned a specific contact within the course team who provides regular support. Escalation of concerns guidance is shared within the DPP handbook and is covered in the supporting student's module. All students and DPPs have access to the university wide practice support network.

Feedback is given to DPPs after students have completed the course and completed their feedback on their learning experience within practice. This feedback covers areas of good practice and areas that students found challenging during practice learning. Any generalised feedback of note is shared with practice partners at the stakeholder meetings.

