



Working as a provisionally-registered pharmacist

July 2020

The aim of provisional registration is to support and enable you to use your education and training to support NHS services and provide patient care effectively, while maintaining standards for entry to the register and protecting patient safety.

This document sets out some of the key information to help you practise safely and effectively when considering taking up a role, or working as, a provisionally-registered pharmacist.

Practising as a provisionally-registered pharmacist

There are certain criteria which must be met when you practise to help make sure that you have the structured support you need to practise safely, and to assure patient safety. You can work in any role and in any sector where these criteria are met.

To practise as a provisionally-registered pharmacist, you must:

- be employed directly by the organisation or business in which you are working (this includes the roles of relief or bank pharmacist within the organisation or business)
- practise under the guidance and direction of a senior pharmacist
- be covered by professional indemnity insurance
- follow our standards for pharmacy professionals, which all pharmacy professionals must meet

You are able to work in a registered pharmacy as the Responsible Pharmacist.

You can work in a primary care setting, provided that the organisation employing you also employs:

- a senior clinician who is a registered healthcare professional (for example a Primary Care Network clinical director or GP partner) who is responsible for the safe delivery of services, and
- a senior pharmacist with at least two years' in sector experience to provide guidance and direction to you

If you are unsure if a role meets these requirements, please **[read the criteria for provisional registration.](#)**

Roles you can't take up as a provisionally-registered pharmacist

You are not eligible to be a superintendent pharmacist or chief pharmacist.

You must not work as a locum pharmacist- that is, you must not work on a self-employed basis, or only have a contract or agreement in place with a locum agency. This is so we can make sure that your employer meets their requirements, such as carrying out a risk assessment before you can start work, and that there are arrangements in place to provide you with the structured support you need to practise safely, and to assure patient safety.

Before you start work

Your employer must carry out a risk assessment before you start work. As part of this assessment, they must consider your current skills and experience, so you should be prepared to share evidence of your learning. You can **find out more about the risk assessment in our information for employers, Employing a provisionally-registered pharmacist.**

You will be able to provide the same services as a fully registered pharmacist, provided that these are within your current scope of competence and you are suitably trained to carry them out.

The suitability of any role will be individual to you, and the skills and experience in different sectors of practice you have gained during your training.

When deciding where to work, you may find it helpful to:

- **check that you are clear about the role and responsibilities it involves**
Make sure you are clear about what you will be asked to do, including whether you will be expected to take on the role of the Responsible Pharmacist, or provide on-call services, for example.
- **consider how the role aligns with your current scope of competence**
In line with standard four of our standards for pharmacy professionals, you are responsible for making sure you only carry out work that you are competent to do. You need to take responsibility for your own development by proactively addressing any skills or knowledge gaps, and for informing your employer of any developmental needs you may have.
- **make sure that you understand the support available to you**
Your employer has a responsibility to ensure that a support structure is in place- and you have a responsibility to use the support available to you. You should make sure you know who to contact and how to contact them if you need direct support during your working hours, before you start work in your role. Find out more in the *Support arrangements* section below.
- **agree how you and your employer will arrange study time for the registration assessment**
It is important that expectations are clear from the start so that you can decide whether this meets your individual needs and so that you know what you can expect from your employer. The amount and nature of the study time may vary according to your individual needs and circumstances, but must be in addition to any study that you may carry out during your annual leave or other free time.

Support arrangements

While you are working as a provisionally-registered pharmacist, your employer must make sure that support arrangements are in place to help make sure that you can practise safely and effectively, and to develop your knowledge and skills. These include:

- **practising under the guidance and direction of a senior pharmacist**

You should be able to contact a senior pharmacist at all times when you are working, to provide clinical and practice support and guidance. This can be in person or remotely by phone or video link, for example. If they are unavailable because of annual leave or sickness, then you should have another named and suitably qualified pharmacist available for you to contact. The senior pharmacist can support other provisionally-registered pharmacists at the same time as you, provided they can do this effectively. The senior pharmacist should also be involved in monitoring and reporting on your development, and in regularly reviewing the risk assessment your employer completed before you started work. You can find out more about their role in [our information for employers](#).

- **signposting to training and development opportunities**

These could be courses provided by professional bodies, internal departments and education providers, for example. This also includes supporting you to identify a suitable mentor.

- **help to develop your own peer support network**

This could include other provisionally-registered pharmacists within or outside the organisation, a previous tutor, university contacts and other local or national pharmacy networks.

Meeting the provisional registration requirements and responsibilities

No matter what the role, if you are employed while on the provisional register, your employer must meet all the employment requirements set out in the criteria. If they are not able to do this, you should not take up the role while you are provisionally registered.

If you practise as a provisionally registered pharmacist, you can be held accountable for your actions, and the actions of others, as set out in law. You should consider the expectations of your accountability as a provisionally-registered pharmacist as part of any role.

Assessing working arrangements for provisionally-registered pharmacists

We will check that the requirements set out in [Employing a provisionally-registered pharmacist](#) are being met, including through our inspectors and through specific requests for risk assessments and reports from senior pharmacists.

We will contact you regularly while you are registered provisionally, to request that you complete a survey to tell us about your employment, if you are working. We expect you to complete the survey each time, so that we can use the information you provide to check that your employer is meeting our requirements.

Being transparent about your provisional registration status

To provide transparency to the people using your pharmacy services, you may need to explain your provisional status, for example, if you are dealing with a complex enquiry and need to check with a senior pharmacist.

If you are operating as a Responsible Pharmacist (RP), your RP notice must identify your status as a provisionally-registered pharmacist. Download and use the RP notice for provisionally-registered pharmacists, available from [the responsible pharmacist page of the main GPhC website](#), as this gives a member of the public the opportunity to find out more about provisional registration, if they want to.

Being open and honest when things go wrong

It is important to contribute to a culture of openness and learning. You have an important responsibility to speak up when you have concerns or things go wrong, as set out in standard eight of the standards for pharmacy professionals. Make sure you know who you should contact within your individual pharmacy or wider organisation to raise concerns. This includes when staffing plans are not effective, and staffing levels and the skill mix may no longer be appropriate.

You should also make sure you understand and implement systems and processes within your workplace in place to identify, resolve and learn from incidents and complaints.

Please make sure you have [read our guidance on raising concerns](#).

If a concern is raised about you while you are working as provisionally-registered pharmacist, we will deal with this in the same way as with other pharmacy professionals. Find out more in the [How we deal with concerns](#) section of the main GPhC website.

Sitting the registration assessment

It's important that you sit the registration assessment at the earliest opportunity, if you are fit to do so.

You are currently registered on a provisional basis, until July 2021 at the latest. You will need to sit and pass the registration assessment if you want to register as a pharmacist beyond July 2021. The registration assessment is still a vital part of assessing that you are able to practise as a pharmacist without the structured support and other requirements outlined in the provisional registration policy.

We will be providing more information about the rescheduled registration assessment during summer 2020. We will make sure that you have the information you need to be able to prepare to sit the assessment in good time.

Other useful sources of information

- Our policy document, *Initial education and training standards for pharmacists: criteria for registering provisionally*, our guidance for tutors on completing the final progress report and declaration, and our guidance for trainees on provisional registration are all available on the [provisional registration page of our website](#).
- See the standards for pharmacy professionals, the standards for registered pharmacies and all the associated guidance in [the Standards section of our website](#).
- The [Royal Pharmaceutical Society mentoring platform](#) brings together pharmacists looking to mentor and pharmacists looking for a mentor.
- [Healthcare Education and Improvement Wales](#) offer a range of resources and training for pharmacists.

- The **Centre for Pharmacy Postgraduate Education** offers a mentoring and coaching service to registrants working in the NHS in England as well as a many other useful training resources to support your practice.
- **Health Education England** has information on pharmacy learning in England.
- **NHS Education for Scotland** provide a range of training options and information for pharmacists.
- The **UK Black Pharmacists Association** provide mentoring and networking support.
- **Pharmacist Support is an independent, trusted charity**, providing a wide variety of support services to pharmacists and their families, former pharmacists and pharmacy students.