

GPhC Pre-Registration Training – Tutor Suitability

What is the purpose of this policy?

The purpose of this policy is to set out what registrant's are required to meet in order to act as a tutor and how the GPhC will assess a registrant's suitability to act, or continue to act, as a tutor to a pre-registration trainee should they be under investigation by us.

What version is this document?

The GPhC produces a range of documents as part of upholding standards and public trust in pharmacy. Some of these are documents that change over time, being updated on a regular basis or as required. In order to make sure that you have the most up to date versions we have created the simple table below. It lets you know the web page where the document can be found, the version of the document you have so you can check to see if newer versions have been made, and also the date of publishing.

Website address	http://www.pharmacyregulation.org/policy/
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Version	Changes	Published	Review Date
1.0	First Published Version	07 July 2014	07 July 2015

Pre-Registration Training – Tutor Suitability

1 Introduction

- 1.1 Pre-registration training is an important and essential part of the process to becoming a registered pharmacist. This period is overseen by a pharmacist who acts as the pre-registration trainee's tutor for the training period and signs them off as competent to practise.
- 1.2 Tutors are in a position of responsibility and are required to act as a role model for their trainee. They must also set a pre-registration training programme, assess their trainee's performance, and provide feedback and support for their trainee throughout the year. It is therefore essential to have checks in place to ensure those registrants that are tutors meet certain requirements and are of suitable character to undertake, or continue in, the important role of tutor.
- 1.3 To be a tutor registrants have to meet certain requirements and, in some circumstances, an assessment will be required to determine their continuing suitability to act as a tutor, pending the outcome of a fitness to practise investigation.

2 Purpose of policy

- 2.1 This policy sets out the criteria a registrant must meet in order to act as a tutor. It further sets out how the GPhC will assess suitability should a registrant seeking to become, or acting as, a tutor be under investigation by us. It will ensure those that act as tutors are of good character and are suitable to act as a key role model to the trainee throughout this important period of pre-registration training.
- 2.2 It will ensure appropriate and transparent approach is in place, that is both fair to the trainee and tutor, and that action is taken when circumstances arise when it isn't suitable, or appropriate, for a registrant to continue as a tutor when under investigation. This may be in order to protect the registrant, the trainee and/or the public and will ensure consistent quality mentoring during the training year is maintained.

3 Policy Statement

- 3.1 This document sets out the framework through which the GPhC will assess the suitability of registrants to act, or continue to act, as tutors. It comprises criteria which all prospective tutors must meet. It includes an assessment that is applicable in specific circumstances should the tutor be under investigation at either of the two stages set out below.

3.2 A registrant must meet the following requirements to be able to act as a tutor¹ to a pre-registration trainee:

- a) They are a registered pharmacist in GB
- b) They have been registered and have been practising in the sector of pharmacy in which they wish to tutor for three years or more, and
- c) They satisfy the assessment requirements if they are under investigation by us

3.3 This policy applies at two specific points of the pre-registration training process:

- Once an application has been received from a trainee
- When a fitness to practise issue arises during training

3.4 A tutoring arrangement cannot be confirmed, or continued, unless the criteria above, and supplementary assessment requirements, are satisfied. If a registrant is under investigation then an assessment through the process as outlined will be necessary.

3.5 The process, from receipt of application, should take no longer than 28 days. An extension will be considered if further information is sought. Provisional approval will not be given to any trainee or registrant if it is sought either verbally or in writing, all trainees or registrants will be referred to this policy.

3.6 There is no appeal function, however, should new information come to light to support an application then a fresh application should be made.

3.7 This framework is independent of any fitness to practise proceedings and the outcome of any assessment cannot be used in, or considered as mitigation (or an aggravating factor), in any proceedings. Full co-operation from the registrant and employer (if applicable) in question is expected in ensuring registrant, trainee and public safety.

3.8 We will disclose relevant information to interested parties in line with established Memoranda of understanding e.g. NHS England, NES.

4 Application of the policy

4.1 This policy sets out the criteria registrant's must meet in order to act as a tutor and for assessing when a tutor, or prospective tutor, is under investigation during a trainee's pre-registration year.

4.2 The policy will apply to all applications and issues that arise from the policy's implementation date.

4.3 The Chief Executive is accountable for the implementation of this policy.

¹ <http://www.pharmacyregulation.org/education/pharmacist-pre-registration-training/tutors>

5 Measurement and evaluation

5.1 This policy will be subject to regular periodic review from the effective date. The first review will take place no more than 12 months from implementation.

5.2 Data on the decision-making process will be continually collated in order to assess the timeliness and quality of the decision-making and application of the policy. Future reviews will take account of the data when assessing the effectiveness of the policy in assessing the suitability of pre-registration tutors under investigation both during the training arrangement and at the point of application.

Jerome Mallon, Fitness to Practise Policy Manager

Reference: **/**/**

Effective date: 07 July 2014

Review date: 07 July 2015

Agreed by: Agreed by Executive Team and signed off by Chief Executive & Registrar

Appendix A – Criteria & Assessment Framework

The following requirements must be met in order for a registrant to be able to act as a tutor²:

- a) They are a registered pharmacist in GB
- b) They have been registered and have been practising in the sector of pharmacy in which they wish to tutor for three years or more, and
- c) They satisfy the assessment requirements if they are under investigation by us

All three criteria are applicable at the application stage and if the prospective tutor is under investigation then an assessment will take place. Where an issue arises during the training year then only criteria C is applicable and an assessment will take place.

Criteria A and B, using information from the GPhC register, are straightforward to assess as to whether either, or both, are met. Criteria C, using information from fitness to practise records, is also relatively straightforward to establish whether it is met or not. However, if it is not met then an assessment must take place in order to ascertain whether the issue for which the tutor (or prospective tutor) is under investigation presents a significant risk to the registrant, the trainee and/or the GPhC and should result in the registrant being unable to act, or continue to act, in the capacity of a tutor. This framework sets out the assessment.

1. Assessment

This assessment will be carried out by a two person panel³ that will make a decision on whether the registrant in question is suitable to act, or continue to act, as a tutor. The decision of the panel will be signed off by a senior manager. If the panel cannot agree on an outcome then the senior manager will decide based on the evidence provided. There is no appeal mechanism, should new information come to light, or circumstances change, then a new application can be made.

When making decisions about suitability we are considering whether the current allegations mean it is not appropriate or safe for you to act as, or continue acting as, a tutor. The decision will be based on the following information:

- Details of allegation
- Any police reports if a caution or conviction occurred
- Relevant information held by Investigation Team

All assessment decisions will be recorded for audit and quality assurance purposes.

The assessment will take account of the seriousness of the offence/issue, including key aspects of the GPhC *good character test*, and assess the suitability of a registrant to tutor or continue to tutor. We will take into account the following when undertaking an assessment.

² <http://www.pharmacyregulation.org/education/pharmacist-pre-registration-training/tutors>

³ Staff from Education and/or Registration

When we assess the evidence of conduct or behaviour we consider:
How serious it is
How relevant it is to the practise of pharmacy
How relevant it is to the integrity of the profession of pharmacy
How recently the incident or incidents took place
If you have made any effort after the incident to rehabilitate yourself
Your insight into your behaviour
Your fitness to practise history
We consider the following conduct or behaviour to be serious⁴:
Dishonesty, fraud, deceit or misrepresentation
Drug or alcohol dependency
Offences for which you received a prison sentence
A criminal caution or conviction
A finding of misconduct or non-fitness to practise by any health or social care regulator
Violence or exhibited intentional or deliberate disregard for human life
Sexual misconduct
Supplying, or illegally manufacturing, any controlled drug
Posed a threat to public health, safety or welfare
Discrimination, for instance on the grounds of race, colour, religion or sex
Blatant disregard for the law or the system of registration

Should a registrant have conditions⁵ applied to their registration at the time the application is submitted stating they must not work as a pre-registration tutor, or any condition that would have a significant impact on their ability to undertake the role of a tutor, then the application will be rejected.

2. Outcomes

The panel will assess the circumstances and details of the allegation(s) against the above and determine one of the following:

- Approve/reject the training arrangement
- Continue/stop the training arrangement

Once fitness to practise proceedings are concluded a training arrangement will be stopped, regardless of the outcome of the original assessment, if the registrant in question has restrictions on their registration resulting in them being unable to fulfil the role of tutor.

3. Notification of Decision

Once a decision has been reached the trainee will be notified within 5 working days of the outcome. The content of the letter will set out the decision and the reasons for coming to that specific decision.

⁴ Likely to result in a rejection of application or cessation of arrangement

⁵ Included in GPhC Conditions Bank

If a training arrangement is to be stopped during the course of the training as a result of a tutor deemed unsuitable to continue then both the trainee and tutor will be notified of the reasons for this and any contingency should then be introduced. In the rare circumstances that we cannot inform the trainee and/or tutor that a training arrangement has been stopped as a result of a fitness to practise issue relating to the (potential) tutor then we will seek legal advice as to what can be disclosed in any communication. This will be dealt with on a case by case basis.

Table 1: Decision Pathway

Decision Point	Criteria/Assessment	Action/Outcome
1 A	They are a registered pharmacist in GB	Met - move on to 1 B
		Not met - reject application
1 B	They have been practising in the sector of pharmacy in which they wish to tutor for three years or more	Met – move on to 1 C
		Not met - reject application
1 C	They satisfy the assessment requirements if they are under investigation by us	Not applicable - agree training arrangement
		Under investigation during training year or when application submitted - move on to 2
2	Assessment ⁶	Satisfied there are no concerns – agree/continue training arrangement
		Not satisfied, concerns exist - reject application/stop training arrangement

⁶ Move straight to assessment if issue arises during training period

Appendix B: Decision Flow Chart

