Independent prescribing programme

University of Reading
Report of a reaccreditation event
February 2017
## Event summary and conclusions

<table>
<thead>
<tr>
<th>Provider</th>
<th>University of Reading</th>
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<tbody>
<tr>
<td>Course</td>
<td>Independent prescribing programme</td>
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<tr>
<td>Event type</td>
<td>Reaccreditation</td>
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<tr>
<td>Event date</td>
<td>14 February 2017</td>
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<tr>
<td>Accreditation period</td>
<td>April 2017 - April 2020</td>
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<tr>
<td>Outcome</td>
<td>Approval</td>
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<td>The accreditation team agreed to recommend to the Registrar of the General Pharmaceutical Council (GPhC) that the University of Reading should be accredited as a pharmacist independent prescribing course provider for a further period of three years.</td>
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<tr>
<td>Conditions</td>
<td>There were no conditions.</td>
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<td>Standing conditions</td>
<td>Please refer to Appendix 1</td>
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<td>Recommendations</td>
<td>No recommendations were made.</td>
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<tr>
<td>Registrar decision</td>
<td>Following the event, the Registrar of the GPhC accepted the accreditation team’s recommendation and approved the reaccreditation of the programme for a further period of three years.</td>
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<tr>
<td>Key contact (provider)</td>
<td>Kat Hall, Programme Director</td>
</tr>
</tbody>
</table>
| Accreditation team     | Mr Mike Pettit (event chair), Senior Lecturer in Pharmacy Practice, University of Sussex  
                       | Professor Helen Howe, Retired hospital Chief Pharmacist |
| GPhC representative    | Miss Jenny Clapham, Quality Assurance Officer, General Pharmaceutical Council |
| Rapporteur             | Professor Brian Furman, Emeritus Professor of Pharmacology, University of Strathclyde |

## 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

Background

The University of Reading was first accredited by the Royal Pharmaceutical Society of Great Britain (RPSGB) in 2008 to provide a programme to train pharmacist independent prescribers. The course was reaccredited by the GPhC in January 2011, and then again in January 2014, on each occasion for a period of three years; in 2014, there had been no conditions or recommendations. In line with the GPhC’s process for reaccreditation of independent prescribing programmes, an event was scheduled on 14 February 2017 to review the programme’s suitability for reaccreditation. The accreditation process was based on the GPhC’s 2010 accreditation criteria for Independent Prescribing.

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 14 February 2017 at the GPhC headquarters, London, and comprised a number of meetings between the GPhC accreditation team and representatives of the University of Reading prescribing programme.

Declarations of interest

There were no declarations of interest.

Key findings

Section 1: The programme provider

All four criteria relating to the programme provider are met (See Appendix 2 for criteria)

The programme is provided by the Centre for Inter-Professional Postgraduate Education and Training (CIPPET), which is part of the School of Pharmacy at the University of Reading. CIPPET has provided prescribing programmes for pharmacists since 2005 and has experience in providing non-medical prescribing programmes for nurses. The programme is subject to the normal University of Reading quality assurance processes and its next six-yearly periodic review will take place in 2018, when the GPhC will expect to be notified of the outcome. The credit value of the programme has been increased from 45 to 60 in recognition of the amount of student effort involved. Since 2015, the programme has been located in the new clinical skills suite which is designed to support group work and clinical skills teaching, and is equipped with computer facilities, consultation rooms with video-recording equipment, as well as all of the necessary equipment for clinical skills teaching. During 2016 an additional weekend programme, approved by the GPhC, was delivered off site at a local hospital which has all the necessary facilities. From 2017, three programmes will be run each year, two during weekdays for nurses and pharmacists, and one at the weekend for pharmacists alone. There are currently five members of staff (1.2FTE) associated with the programme, which is additionally supported by visiting lecturers who provide specialist teaching for legal and clinical aspects. The programme director is a registered pharmacist and like the other staff team members, is a qualified independent prescriber.
Section 2: Pre-requisites for entry

All six criteria relating to the pre-requisites for entry are met

In addition to the University standard online application process, applicants are provided with online guidance outlining the requirements for admission and how the evidence can be provided. Submitted applications are reviewed to confirm current registration with the GPhC register; it will also be made clear in future documentation that applicants registered with the PSNI are eligible to join the programme. As part of the application process, applicants must submit a personal statement providing information about their appropriate patient-orientated experience. The applications, including personal statements and evidence for continuing professional development are scrutinised by the staff team, with queries being resolved in discussion with the applicants. The wide variety of experience available among staff members and visiting lecturers enables advice to be offered to applicants, for example, those wishing to prescribe in an area of practice that is new to them.

Section 3: The programme

All eight criteria relating to the programme are met.

The programme learning outcomes are based on those specified by the GPhC, and have been mapped to the various assessment methods. The teaching and learning strategy aims to provide an intellectually challenging learning experience through innovative and profession-focused teaching within a supportive, student-centered environment, and recognises the background knowledge and experience of pharmacists taking the programme. CIPPET representatives meet with commissioners at Health Education England, Thames Valley and Wessex, to ensure that the programme meets their needs. The programme is taught by means of lectures, presentations and tutorials, with additional self-directed learning, allowing pharmacists build on their background knowledge and experience to acquire competence in prescribing. Consultation skills are taught by medical staff, with hands-on practical teaching of physical and diagnostic examination skills by nurses. Students receive regular formative feedback and undertake a practice OSCE and mock written examination enabling them to reflect on their performance prior to the final assessments. Students’ progress is monitored through a combination of attendance, submission for formative feedback, engagement with the practice OSCE and the mock written examination.

Section 4: Learning in Practice

All five criteria relating to learning in practice are met.

Designated medical practitioners (DMPs) are provided with a specific handbook to support their role; this details the roles of the DMP and the programme team in teaching clinical assessment skills. It is also made clear that the DMP is responsible for assessing the student’s overall competence to prescribe, which includes any clinical examination skills in their area of practice. DMPs are screened to ensure their suitability for the role and the DMP handbook includes links to the competency framework. DMPs are also sent an induction presentation, which includes details of the course; if needed, DMPs can speak to a member of the programme staff by telephone or through a site visit. Students experiencing difficulties usually self-present; staff members discuss the issues with the student, with the rest of the staff team being drawn in to provide support if there are major issues. While the DMPs are expected to provide formative feedback to their students, they are not involved in summative assessments, other than the final DMP declaration of competence. The DMP must confirm that the pharmacist has satisfactorily completed at least 12x7.5h days of supervised practice and that in the DMP’s opinion, the skills demonstrated in practice confirm the pharmacist as being suitable for annotation as an Independent Prescriber. Failure in the period of learning in practice cannot be compensated by performance in other elements.
Section 5: Assessment

All four criteria relating to assessment are met.

The programme uses extended patient OSCEs (objective, structured, clinical examinations), a written examination and a professional portfolio to demonstrate attainment of the learning outcomes, showing that the students are competent and confident practitioners. Students are made aware of the assessment methods in the programme handbook. They are normally allowed one resit, although two resits are allowed in the case of the numeracy test, in which the pass-mark is 100%. The assessments undergo internal moderation with regular second and, where necessary, third marking. The internal examination board meets prior to the external examination board to ensure robust results are presented to the external examiner, who scrutinises all assessments, with members of the programme team who work in clinical practice providing confirmation of safe and effective practice. Mechanisms are in place to address any causes for concern, for example relating to potential patient harm resulting from a student’s actions. In any assessment, a failure to identify a serious problem or an answer which would cause the patient harm will result in overall failure of the programme.

Section 6: Details of Award

Both criteria relating to details of the award are met.

Successful students are awarded a ‘Practice Certificate in Independent Prescribing’ which includes their name, GPhC number and date of the University level ratification. University level ratification occurs after a member of the University Senate approves the outcome of the external examination board. The pass list, as approved via University level ratification, is sent to the GPhC by the programme administration team upon approval of the programme director.
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

GPhC accreditation criteria for pharmacist independent prescribing programmes

Section 1: The programme provider

1.1 Must be part of, or be closely associated with, a higher education institution which implements effective quality assurance and quality management and enhancement systems and demonstrates their application to prescribing programmes. The programme must be validated by its higher education institution.

1.2 Must have adequate physical, staff (academic and administrative) and financial resources to deliver the programme including facilities to teach clinical examination skills.

1.3 Must have identified staff with appropriate background and experience to teach the programme, ideally including practising pharmacists with teaching experience and staff with clinical and diagnostic skills.

1.4 Must have an identified practising pharmacist with appropriate background and expertise who will contribute to the design and delivery of the programme. The identified pharmacist must be registered with the General Pharmaceutical Council (GPhC), and where possible should be a pharmacist independent prescriber.
Section 2: Pre-requisites for entry

2.1 Entrants must be a registered pharmacist with the GPhC or the Pharmaceutical Society of Northern Ireland (PSNI).

2.2 Entrants must have at least two years appropriate patient-orientated experience in a UK hospital, community or primary care setting following their preregistration year.

2.3 Entrants must have identified an area of clinical practice in which to develop their prescribing skills and have up-to-date clinical, pharmacological and pharmaceutical knowledge relevant to their intended area of prescribing practice.

2.4 Entrants should demonstrate how they reflect on their own performance and take responsibility for their own CPD.

2.5 The provider must ensure that the DMP, identified by the pharmacist, has training and experience appropriate to their role. This may be demonstrated by adherence to the Department of Health Guidance (2001). The DMP must have agreed to provide supervision, support and shadowing opportunities for the student, and be familiar with the GPhC’s requirements of the programme and the need to achieve the learning outcomes.

2.6 Entrants who are not registrants of the GPhC or PSNI may undertake the taught components of the programme but may not undertake the period of supervised practice.

Section 3: The programme

3.1 Must be taught at least at bachelor’s degree level (FHEQ (2008), level 6) and reflect the fact that since June 2002, pharmacists have graduated and practise at master’s degree level (FHEQ (2008), level 7).

3.2 Must achieve the 16 learning outcomes listed in the curriculum for independent prescribing which must be mapped against the programme’s learning outcomes and assessments. The programme learning outcomes must be aligned with the relevant level of study.

3.3 Must include teaching, learning and support strategies which allow pharmacists to build on their background knowledge and experience and acquire competence in prescribing.

3.4 Must provide opportunities for pharmacists to demonstrate how they will apply their learning to the conditions for which they will be prescribing.

3.5 Must contain learning activities equivalent to 26 days, normally over a period of three to six months.

3.6 Must have robust systems to monitor attendance and progression.

3.7 Must have a clear policy on attendance and participation and the obligations of pharmacists who miss part of the programme. Pharmacists must attend all scheduled teaching and learning sessions that provide instruction on clinical examination and diagnosis.

3.8 May recognise and allow reduced learning time for previous learning or experience, which is directly equivalent to programme content and for which evidence is provided. Recognition should be according to established institutional procedures on previous learning or experience. Regardless of previous learning or experience, all pharmacists must undertake all assessments.

Section 4: Learning in Practice

4.1 The provider must support the DMP with clear and practical guidance on helping the pharmacist successfully to complete the period of learning in practice including arrangements for quality assurance of summative assessments. The roles of the programme provider and the DMP for teaching the skills for clinical assessment of patients must be clearly set out.

4.2 The provider must support the DMP with clear and practical guidance on their role in the assessment of the student.

4.3 The provider must obtain formal evidence and confirmation from the DMP using the specified wording; “the pharmacist has satisfactorily completed at least 12x7.5h days supervised practice”.
4.4 The provider must obtain a professional declaration from the DMP using the specified wording: “In my opinion as the DMP, the skills demonstrated in practice confirm the pharmacist as being suitable for annotation as an Independent Prescriber”

4.5 Failure in the period of learning in practice cannot be compensated by performance in other assessments.

Section 5: Assessment

The programme provider should ensure that assessment strategies meet the requirements of the curriculum particularly:

5.1 Evidence from a range of assessments that the student has achieved the intended learning outcomes of the programme.

5.2 The programme will be assessed separately from any other programmes or programme components and lead to a freestanding award which confirms the competence of the pharmacists as an independent prescriber.

5.3 The assessment scheme should demonstrate that the criteria for pass/fail and any arrangements for compensation between elements of assessment, together with the regulations for resit assessments and submissions, are consistent with safe and effective prescribing and the achievement of all learning outcomes.

5.4 In any assessment, a failure to identify a serious problem or an answer which would cause the patient harm should result in overall failure of the programme.

Section 6: Details of Award

6.1 The provider should award successful candidates a ‘Practice Certificate in Independent Prescribing’ confirming that the candidate has successfully completed the programme and the period of learning in practice.

6.2 The provider should 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 and confirming that they are eligible for annotation on the GPhC Register as independent prescribers.

Appendix 3 – Learning outcomes

Independent prescribing programme learning outcomes

All GPhC accredited independent prescribing courses need to ensure that following qualification pharmacist independent prescribers are be able to:

1. Understand the responsibility that the role of independent prescriber entails, be aware of their own limitations and work within the limits of their professional competence – knowing when and how to refer / consult / seek guidance from another member of the health care team.

2. Develop an effective relationship and communication with patients, carers, other prescribers and members of the health care team.

3. Describe the pathophysiology of the condition being treated and recognise the signs and symptoms of illness, take an accurate history and carry out a relevant clinical assessment where necessary.

4. Use common diagnostic aids e.g. stethoscope, sphygmomanometer

5. Able to use diagnostic aids relevant to the condition(s) for which the pharmacist intends to prescribe, including monitoring response to therapy.

6. Apply clinical assessment skills to:
   - inform a working diagnosis
- formulate a treatment plan for the prescribing of one or more medicines, if appropriate
- carry out a checking process to ensure patient safety.
- monitor response to therapy,
- review the working differential diagnosis and modify treatment or refer
- consult/seek guidance as appropriate

7. Demonstrate a shared approach to decision making by assessing patients’ needs for medicines, taking account of their wishes and values and those of their carers when making prescribing decisions.

8. Identify and assess sources of information, advice and decision support and demonstrate how they will use them in patient care taking into account evidence based practice and national/local guidelines where they exist.

9. Recognise, evaluate and respond to influences on prescribing practice at individual, local and national levels.


11. Work within a prescribing partnership.

12. Maintain accurate, effective and timely records and ensure that other prescribers and health care staff are appropriately informed.

13. Demonstrate an understanding of the public health issues related to medicines use.

14. Demonstrate an understanding of the legal, ethical and professional framework for accountability and responsibility in relation to prescribing.

15. Work within clinical governance frameworks that include audit of prescribing practice and personal development.

16. Participate regularly in CPD and maintain a record of their CPD activity.

Appendix 4 – Indicative content

It is expected that education providers will use the indicative content to develop a detailed programme of study which will enable pharmacists to meet the learning outcomes.

Consultation, decision-making, assessment and review

- Autonomous working and decision making within professional competence.
- Understanding own limitations
- Accurate assessment, history taking, and effective communication and consultation with patients and their parents/carers
- Patient compliance and shared decision making
- Building and maintaining an effective relationship with patients, parents and carers taking into account their values and beliefs
- Effective communication and team working with other prescribers and members of the health care team
- A knowledge of the range of models of consultation and appropriate selection for the patient
- Formulating a working diagnosis
- Development of a treatment plan or clinical management plan, including lifestyle and public health advice
- Confirmation of diagnosis/differential diagnosis – further examination, investigation, referral for diagnosis
- Principles and methods of patient monitoring
- Chemical and biochemical methods for monitoring the treatment of the condition(s) for which the pharmacist intends to prescribe on qualification and responses to results.
- Clinical examination skills relevant to the condition(s) for which the pharmacist intends to prescribe.
• Recognition and responding to common signs and symptoms that are indicative of clinical problems. Use of common diagnostic aids for assessment of the patient’s general health status; e.g. stethoscope, sphygmomanometer, tendon hammer, examination of the cranial nerves.
• Assessing responses to treatment against the objectives of the treatment plan/clinical management plan
• Working knowledge of any monitoring equipment used within the context of the treatment/clinical management plan
• Identifying and reporting adverse drug reactions
• Management options including non-drug treatment and referral

Influences on and psychology of prescribing

• Patient demand versus patient need including partnership in medicine taking, awareness of cultural and ethnic needs.
• External influences, at individual, local and national levels.
  ▪ Awareness of own personal attitude and its influence on prescribing practice.

Prescribing in a team context

• The role and functions of other team members
• Communicating prescribing decisions to other members of the team.
• The responsibility of a supplementary prescriber in developing and delivering a clinical management plan.
• The professional relationship between pharmacist prescribers and those responsible for dispensing.
• Interface between medical and non-medical prescribers and the management of potential conflict
• Documentation, and the purpose of records
• Structure, content and interpretation of health care records/clinical notes including electronic health records
• The framework for prescribing budgets and cost effective prescribing

Applied therapeutics

• Pharmacodynamics and pharmacokinetics
• Changes in physiology and drug response, for example the elderly, young, pregnant or breast feeding women and ethnicity
• Adverse drug reactions and interactions, to include common causes of drug-related morbidity
• Pathophysiology of defined condition(s) for which the pharmacist intends to prescribe.
• Selection and optimisation of a drug regimen for the patient’s condition
• Natural history and progression of condition(s) for which the pharmacist intends to prescribe.
• Impact of co-morbidities on prescribing and patient management

Evidence-based practice and clinical governance

• Local and professional clinical governance policies and procedures
• Development and maintenance of professional knowledge and competence in relation to the condition(s) for which the pharmacist intends to prescribe.
• The rationale for national and local guidelines, protocols, policies, decision support systems and formularies – understanding the implications of adherence to and deviation from such guidance
• Prescribing in the context of the local health economy
• Principles of evidence-based practice and critical appraisal skills
• Reflective practice and continuing professional development, support networks, role of self, other prescribers and organisation
• Auditing, monitoring and evaluating prescribing practice
• Risk assessment and risk management
• Audit and systems monitoring
• Analysis, reporting and learning from adverse events and near misses

Legal, policy, professional and ethical aspects

• Policy context for prescribing
• Professional competence, autonomy and accountability of independent and supplementary prescribing practice
• GPhC’s Standards of Conduct, Ethics and Performance
• Legal frameworks for prescribing, supply and administration of medicines e.g. patient group directions, supply in hospitals.
• Medicines regulatory framework including Marketing Authorisation, the use of medicines outside their product licence.
• The law applied to the prescribing, dispensing and administration of controlled drugs and appropriate counselling of patients
• Compliance with guidance arising from the Shipman enquiry
• Ethical considerations of the supply and administration of medicines
• Application of the law in practice, professional judgment, liability and indemnity
• Accountability and responsibility to the employer or commissioning organisation, awareness of local complaints procedures
• Consent
• Prescription pad administration, procedures when pads are lost or stolen
• Writing prescriptions
• Record keeping, documentation and professional responsibility
• Confidentiality, Caldicott and Data Protection, Freedom of Information
• Suspicion, awareness and reporting of fraud or criminal behaviour, knowledge of reporting and ‘whistle blowing’ procedures

Prescribing in the public health context

• Patient access to health care and medicines
• Duty to patients and society
• Use of medicines in populations and in the context of health priorities
• Public health policies, for example the use of antibiotics, antivirals and vaccines
• Inappropriate use of medicines including misuse, under and over-use
• Inappropriate prescribing, over and under-prescribing

Note: The standards of proficiency for supplementary prescribers are included in the standards for independent prescribers.