General Pharmaceutical Council

National Pharmacy Association pharmacy support staff courses reaccreditation event report, November 2021



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| Event summary and | conclusions | | | |
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| Provider | National Pharmacy Association | | | |
| Course/Qualification | Support staff courses | | | |
| Names of courses | Dispensing Assistant (known as ADAC) | | | |
| | Medicines Counter Assistant | | | |
| | Combined Medicines Counter and Dispensing Assistant (known as MCDC) | | | |
| | Delivering Medicines Safety and Effectively | | | |
| | Introduction to Pharmacy Stock Control | | | |
| Event type | Reaccreditation | | | |
| Event date | 11-12 November 2021 | | | |
| Approval period | January 2022 – January 2025 | | | |
| Relevant requirements | Requirements for the education and training of pharmacy support staff, October 2020 | | | |
| Framework used | National Occupational Standards | | | |
| Outcome | Approval with conditions | | | |
| | The accreditation team agreed to recommend to the Registrar of the General Pharmaceutical Council (GPhC) that the support staff courses provided by National Pharmacy Association should be reaccredited for a period of three years, subject to three conditions. | | | |
| Conditions | 1. The provider must implement a comprehensive learner equality, diversity and inclusion (EDI) data collection process, enhanced to include the relevant legal protected characteristics, and revise the current systems in place between the provider and supervisor in relation to collection of learner EDI declarations, data, and analysis. A system must be developed where EDI data is collected directly from the learner and analysed effectively. This is because although the accreditation team could see a limited EDI data collection process, initiated by the workplace supervisor, it was agreed that this process was not sufficient and may not be GDPR compliant nor ensure learner privacy. This is in relation to criterion 1a and 5d. Evidence of the enhanced EDI data collection processes and analysis must be sent to the GPhC for review prior to any learners enrolling onto the new iterations of the courses. | | | |

| | The provider must undertake a review of course material and assessment to reflect relevant protected characteristics, as per the EDI addendum presented to the team prior to the event. This is because although the accreditation team could see limited evidence of EDI within the course material and assessment, detail on how the addendum was going to be implemented directly into course content and assessment, including timelines, was unclear. This is in relation to criterion 1a. Evidence of how this has been implemented into the course material and assessment must be sent to the GPhC for review prior to any learners enrolling onto the new iterations of the courses. The provider must implement a robust and documented system for observed unsafe practice by a learner whereby the observation is stopped, immediate feedback is provided, and relevant parties are notified. This is because the team noted inconsistencies within the submission documentation, supervisor and learner guidance and verbal responses in respect of unsafe practice and procedures. This is to meet criterion 3c. Evidence of how this has been implemented must be sent to the GPhC for review prior to any learners enrolling onto the new iterations of the courses. |
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| Standing conditions | A link to the standing conditions can be found here . |
| Recommendations | Although the accreditation team noted the stakeholder engagement presented as part of the submission and verbal responses to questions, the team would like to see a broader range of stakeholders involved in the development and review of the courses, including patients and the public. This should happen periodically to reflect changes in pharmacy services. It is therefore a recommendation that the NPA should undertake a review of their current stakeholder engagement process to engage with a wider range of stakeholders in a meaningful way. This is in relation to criterion 5b. |
| Minor amendments | Any references to resit papers in the course documentation must be updated to reflect the move to online assessments. |
| Registrar decision | Following the event, the provider submitted a response to the conditions and the accreditation team reviewed and agreed that all three conditions had been met. The Registrar of the GPhC accepted the accreditation team's recommendation and approved the reaccreditation of the support staff courses for a period of three years. |
| Key contact (provider) | Kushal Patel, Quality Assurance Manager |

| Provider representatives | Louise Baglole, Head of Learning & Development Adrienne Horrocks, Learning & Development Pharmacist Heenal Malde, Learning & Development Manager Kushal Patel, Quality Assurance Manager Jared Rattenbury, E-learning Content Developer | |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Accreditation team | Leonie Milliner (Team Leader) Director for Education, General Optical Council Leanne Bartholomew, Senior Medicines Management Pharmacy Technician at West Suffolk CCG Sheetal Jogia, Head of Education and Training at Bart's Health Pharmaceuticals, Bart's Health NHS Trust Laura McEwen-Smith, National Programme Lead; Primary and Community Integrated Care | |
| GPhC representative | Chris McKendrick, Quality Assurance Officer | |
| Rapporteur | Jane Smith, Chief Executive Officer, European Association for Cancer Research | |
| Observers | Rebecca Chamberlain, pharmacy technician, team leader in training Joanne Bye, pharmacy technician, panel member in training Shazah Ahmad, pharmacist, panel member in training | |

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 approval process is based on the Requirements for the education and training of pharmacy support staff, October 2020.

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 National Pharmacy Association (NPA), 'the provider', is a trade association for independent community pharmacy owners in the UK. It offers a range of support staff training courses and was originally accredited by the Royal Pharmaceutical Society of Great Britain to offer four courses:

- Dispensing Assistant
- Medicines Counter Assistant
- Delivering Medicines Safely and Effectively
- Introduction to Pharmacy Stock Control

These courses were reaccredited by the GPhC in 2011, 2014 and 2018. At the most recent event, there were no conditions or recommendations associated with any of the courses.

In 2019, the NPA approached the GPhC with an application for accreditation of a combined Medicines Counter Assistant and Dispensing Assistant course, a combination of the two separate accredited courses. As the proposed new, combined course contained no new material and simply removed duplication between the two accredited courses, the GPhC agreed that the accreditation could be carried out as a desktop review. The review took place in December 2019 and January 2020 and the course was accredited with no conditions or recommendations.

In line with the GPhC's process, an event was scheduled for 11-12 November 2021 to review the suitability of the suite of five courses for reaccreditation.

Documentation

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

Pre-event

In advance of the main event, a pre-event meeting took place by video-conference on 5 November 2021. The purpose of the pre-event meeting was to prepare for the event, allow the GPhC and the provider to ask any questions or seek clarification, and to finalise arrangements for the event.

The event

The event began with a private meeting of the accreditation team and GPhC representatives on 11 November 2021. The remainder of the event took place via video-conference on 12 November 2021 and comprised a series of meetings with the provider staff involved in the design of the courses.

Declarations of interest

There were no declarations of interest.

| Schedule | |
|-------------------------------------------------------------------------------------------|---------------|
| Meeting | Time |
| Day 1 – 11 November 2021 | |
| Private meeting of accreditation team and GPhC representatives | 14:00 – 15:45 |
| Day 2 – 12 November 2021 | |
| Private meeting of accreditation team and GPhC representatives | 09:00 - 09:10 |
| Accreditation team and GPhC representatives meet with the course provider representatives | 09:10 – 11:00 |
| Meeting to discuss the learning outcomes | 11:30 -12:30 |
| Meeting with the internal and external quality assurance of the courses | 13:30 – 14:15 |
| Private meeting of accreditation team and GPhC representatives | 14:15 – 15:15 |
| Deliver outcome to provider | 15:30 – 15:45 |

Key findings - Part 1 - Outcomes for all support staff

During the event the accreditation team reviewed the provision against all 19 outcomes required for all pharmacy support staff roles. To gain additional assurance, the accreditation team also explored a sample of **four** learning outcomes during a separate meeting with the provider and was satisfied that **all 19 learning outcomes are met** to the level required by the GPhC requirements.

Key findings - Part 2 - Standards for the initial education and training

Criteria 1: Equality, diversity and inclusion

Criteria met/will be met? Yes ☐ No ☒

The team was satisfied that two of the three criteria relating to equality, diversity and inclusion will be met with one criterion subject to two conditions.

There are no selection criteria for the courses; all learners put forward by their employers are accepted for enrolment. Enrolment is carried out online by the supervisor. At the point of enrolment, the supervisor must provide ethnicity and disability data on behalf of their learner and this data is analysed annually to identify trends and issues. It was agreed by the accreditation team that this process of data collection was not sufficient and may not be GDPR compliant nor ensure learner privacy.

Furthermore, the team could see limited evidence of equality, diversity and inclusion (EDI) within the course material and assessment. Prior to the event, the provider had created an 'addendum' to the courses; information on EDI that will be provided to learners and that will ultimately be incorporated into the course materials and assessment. However, detail on how and when this addendum was going to be incorporated was lacking. There will therefore be two conditions of reaccreditation for all five courses, namely that:

- the provider must implement a comprehensive learner EDI data collection process, enhanced
 to include the relevant legal protected characteristics, and revise the current systems in place
 between the provider and supervisor in relation to collection of learner EDI declarations, data,
 and analysis. A system must be developed where EDI data is collected directly from the learner
 and analysed effectively. Evidence of this enhanced process must be sent to the GPhC for
 review prior to any learners enrolling onto the new iterations of the courses; and
- the provider must undertake a review of course material and assessment to reflect relevant protected characteristics, as per the EDI addendum presented to the team prior to the event. This is in relation to criterion 1a. Evidence of how this has been implemented into the course material and assessment must be sent to the GPhC for review prior to any learners enrolling onto the new iterations of the courses. The team however noted the positive use of assisted technology as part of the wider course offering.

Reasonable adjustments are made for learners who need them, and the team noted the positive use of assisted technology as part of the wider course offering.

Criteria 2: Course curriculum

Criteria met/will be met? Yes

No □

The team was satisfied that all six criteria relating to course curriculum will be met.

Since the last reaccreditation event, the provider has introduced a new online learning platform, the Learning Academy, to replace the old platform known as the Learning Zone. An online and blended version of each of the five courses will be offered to learners. The blended version will consist of

paper-based learning resources with online multiple choice assessments and requiring the upload of a scanned version of the completed competency booklet.

The courses are taught at RQF level 2. Each course is mapped to the 19 GPhC generic outcomes and to the National Occupational Standards (NOS) selected by the provider as being relevant to the role in question. The provider consulted its board members on the selection of the NOS. Patients were not consulted, and the team addressed issues of stakeholder engagement at Criteria 5.

In each course, learners are expected to follow a structured path so that a foundation level of knowledge is achieved from which more complex topics can be introduced later on in the course. Each course includes opportunities for formative assessments throughout. The supervisor assesses the learner's ability to perform tasks considered more suitable for observation, recording observations in the competency booklet. Supervisors are given a Supervisor Guide and directed to an introductory video and must declare that they have read the guidance and are aware of their responsibilities. Both learners and supervisors are encouraged to contact the provider if they have queries or concerns at any point in the course.

Criteria 3: Assessment Criteria met/will be met? Yes □ No ☒

The team was satisfied that three of the four criteria relating to assessment will be met with one criterion subject to a condition. One criteria requires minor amendments.

In response to the new GPhC requirements, the assessment strategy for each of the courses has been updated. Each course is now assessed via a mixture of online multiple choice questions (MCQs) and in-pharmacy observation of competencies by the supervisor. The MCQs are mapped to the course content, and there is a robust internal review process before questions are weighted and approved for use. Questions are reviewed annually.

The MCQ assessments are completed under examination conditions without access to resources. They are automatically marked by the system, so learners are given immediate feedback, including a prepopulated explanation for any questions answered incorrectly. The pass mark for MCQ assessments is 80%. If a learner fails their first attempt, they are eligible for a first resit. If this is also failed, then their work is reviewed by the provider. This allows an opportunity to provide feedback to the learner and their supervisor before a third and final attempt is allowed. If a leaner fails the third attempt, they are discontinued from the course. Learners are permitted to re-enrol after a period of six months.

Learners are required to undertake formative MCQ and short answer assessments ('activities') that are recorded in the competency booklet. Supervisors provide feedback on the formative activities and are given guidance on this in the Supervisor Handbook.

The competency booklets are quality assured via a random sampling process. Reviewers check that all formative exercises have been completed, that all competencies have been observed the required number of times, and that observations are spread over time.

The team noted inconsistencies within the submission documentation, supervisor and learner guidance and the provider's verbal responses in respect of the action to be taken in the case of unsafe practice being observed by the supervisor. It will therefore be a condition of accreditation that the provider implements a robust and documented system for observed unsafe practice by a learner whereby the observation is stopped, immediate feedback is provided, and relevant parties are

notified. Evidence of how this has been implemented must be sent to the GPhC for review prior to any learners enrolling onto the new iterations of the courses.

The team also noted that the submission describes sending re-sit papers to learners, which relates to the old paper-based courses. Any references to resit papers in the course documentation must be updated to reflect the move to online assessments.

Criteria 4: Management, resources and capacity

Criteria met/will be met? Yes

No □

The team was satisfied that all eight criteria relating to management, resources and capacity will be met.

The team was satisfied that the provider has an appropriate level of staff and IT resources to deliver the courses. The provider has invested significantly in its new online learning platform to mitigate the risks associated with a move to online delivery, and has also employed two e-learning developers to support this change. Certificates of completion are delivered automatically to each learner through the platform.

The roles and responsibilities of the learner, employer and provider are clearly set out in a learning contract and reinforced in the Student and Supervisor Guides. These guides also set out the course plagiarism and malpractice procedures. Procedures are in place to deal appropriately with concerns and complaints raised by learners or supervisors.

Criteria 5: Quality management

Criteria met/will be met? Yes ☐ No 🛛

The team was satisfied that three of the four criteria relating to quality management will be met with one criterion subject to a condition. One recommendation was made.

The courses are appropriately monitored, reviewed and updated. A full review of each of the courses is carried out annually, with the law and ethics and Drug Tariff sections reviewed every six months. Any important or urgent developments between these scheduled reviews are communicated to students via an addendum which is published online.

Assessment decisions are quality assured via the sampling of competency booklets. The team suggested that the provider could collate feedback to supervisors based on this sampling process. Feedback from learners and supervisors is sought via a survey at the end of the course and considered at the annual course review. Although the accreditation team noted some wider stakeholder engagement presented as part of the submission and in verbal responses to questions, the team would like to see a broader range of stakeholders involved in the development and review of the courses, including patients and the public. This should happen periodically to reflect changes in pharmacy services. It is therefore a recommendation that the provider undertake a review of the current stakeholder engagement process to engage with a wider range of stakeholders in a meaningful way.

As noted at Criteria 1, the provider collects and analyses limited data about learners, including equality and diversity characteristics. It will therefore be a condition of accreditation that the provider implements a comprehensive leaner EDI data collection process, enhanced to include the relevant

legal protected characteristics, and revises the current systems in place between the provider and supervisor in relation to collection of learner EDI declarations, data, and analysis. A system must be developed where EDI data is collected directly from the learner and analysed effectively. Evidence of this enhanced process must be sent to the GPhC for review prior to any learners enrolling onto the new iterations of the courses.

Criteria 6: Supporting learners and the learning experience

Criteria met/will be met? Yes ☒ No ☐

The team was satisfied that all five/ criteria relating to supporting learners and the learning experience will be met.

Information about each course is contained in the supervisor and student guides, designed to inform the supervisor and learner about course policies and procedures as well as the course structure and content. A short introductory video has been produced to support the supervisor guide.

The supervisor guide contains a section on coaching and feedback so that supervisors can see what kind of feedback learners can expect to receive. Learners are also provided with an online support guide, signposting various resources available to them. The provider can be contacted by learners and supervisors by phone and email. Any query in relation to pastoral care is sent directly to the course lead who will then contact the learner and/or supervisor if appropriate.

A learning contract is signed by the provider, learner and supervisor at the start of each course. Should the supervisor leave part way through the learner's course, then the course is suspended util a new supervisor is in place.

The team noted that course completion rates appeared to be low, but the provider explained that these are rolling rates, with students joining and completing the course at any point with no fixed start and end dates. There have also been a higher than usual number of course extensions due to the pandemic.

Key findings - Part 3 - Role-specific learning outcomes

Please see the individual courses part 3 report for commentary.

