



PSNC's response to the General Pharmaceutical Council's consultation on initial education and training standards for pharmacists

April 2019

Contact: Alastair Buxton
Director of NHS Services
Alastair.Buxton@psnc.org.uk
0203 1220 825

Pharmaceutical Services Negotiating Committee
14 Hosier Lane | London | EC1A 9LQ

Introduction

The Pharmaceutical Services Negotiating Committee (PSNC) promotes and supports the interests of all NHS community pharmacies in England. We are recognised by the Secretary of State for Health as the body that represents NHS pharmacy contractors. We work closely with Local Pharmaceutical Committees (LPCs) to support their role as the local NHS representative organisations.

Our goal is to develop the NHS community pharmacy service, and to enable community pharmacies to offer an increased range of high quality and fully funded services; services that meet the needs of local communities, provide good value for the NHS and deliver excellent health outcomes for patients.

We welcome the opportunity to be able to provide our response to the proposals set out in the General Pharmaceutical Council's consultation on the initial education and training standards for pharmacists.

Consultation questions

Section 1: Learning outcomes

- 1. Considering the full set of learning outcomes in Part 1 of the draft initial education and training standards, to what extent do you agree or disagree that these are appropriate learning outcomes for a pharmacist?**
Tend to agree.
- 2. Is there anything in the learning outcomes that is missing or should be changed?**
No.
- 3. Which of the following areas need additions and/or amendments?**
N/A.
- 4. Please give a brief description of the additions and/or amendments you think are needed (if possible, please give the reference numbers of the learning outcomes).**
N/A.

Section 2: Standards for providers

- 5. Considering the full set of standards and criteria in Part 2, to what extent do you agree or disagree that these are appropriate for the initial education and training of pharmacists?**
Tend to agree.
- 6. Is there anything in the standards or criteria that is missing or should be changed?**
Yes.
- 7. Which of the following areas need additions and/or amendments? Please give a brief description of the additions or amendments you think are needed.**
In general, we agree with the principle of having standards and criteria that apply to all organisations and environments which contribute to delivery of the training of student pharmacists; however, there are criteria

in the standards which we feel require further consideration or clarification. We have detailed these below.

- Domain 2 - We agree that reasonable adjustments must be put in place to ensure that any student pharmacist with specific needs can meet the learning outcomes. However, it should be clarified that placement providers must be made aware of any required adjustments in advance to ensure that these can be implemented prior to the start of the placement and to ensure that the placement location is most suited to the student pharmacist's needs.
- Standard 3 – Multiple pharmacy contractors may find it difficult to manage different arrangements and contracts with each School of Pharmacy.
- Criterion 3.1 – We agree there must be an appropriate level of resource to deliver a sustainable and accreditable initial education and training programme. This is however likely to create resource implications for pharmacy contractors acting as training providers; these implications will need to be considered by funding and commissioning bodies such as NHS England and Health Education England.
- Criterion 3.3 – The criterion does not state which organisation assesses whether premises are 'fit for purpose' and who enforces this requirement, ensuring a consistent approach is taken across the country.
- Criterion 4.1 – More information is needed to explain the levels of responsibilities and accountabilities in relation to training providers and universities. The 'need to have an agreement in place between different organisations' implies that an agreement would be required with every School of Pharmacy, which would be very burdensome for multiple pharmacy contractors.

Section 3: Integrating the five years of initial education and training

8. Do you agree or disagree that we should set integrated standards for the five years of education and training?

Strongly agree.

9. Please explain your response

We recognise the benefit of integrating education with learning in practice to help develop student pharmacists' communication skills and confidence in undertaking clinical activities. We also believe a more patient-focused integrated pharmacy degree could help meet the needs of the evolving healthcare landscape. We welcome a stronger link between academic study in the MPharm degree and workplace experience.

We are supportive of developing student pharmacists to perform to their optimum capabilities and we recognise the benefits of learning within the workplace that helps build confidence and competence. However, the operational implications of any integrated degree proposals must be carefully explored.

Section 4: Selection and admission requirements

10. Do you agree or disagree with our proposal to require schools of pharmacy to assess the skills and attributes of prospective students as part of their admission procedures?

Strongly agree.

11. Please explain your response.

We agree with the proposal to require Schools of Pharmacy to assess the skills and attributes of prospective students; we see this as an important part of the admissions process to ensure that prospective student pharmacists have the necessary attributes to become a successful pharmacist, especially in the increasingly patient-facing role of the profession.

12. Do you agree or disagree with our proposal to make an interactive component mandatory in integrated initial education and training admission procedures?

Strongly agree.

13. Please explain your response

We believe that an interactive element to admissions is the best way to determine whether an applicant possesses the desired attributes of a prospective student pharmacist.

14. To achieve this balance, should we be more prescriptive about admissions requirements?

Don't know.

15. Please explain your response

To attract the highest calibre of student pharmacists, academic entry requirements must be robust, and we agree with criterion 1.5, requiring explanations from institutions that are found to be accepting candidates who have not met stated academic entry requirements. We believe an academic minimum standard may help to drive consistency across universities, but extensive consultation with Schools of Pharmacy would be necessary to ascertain what admissions requirements are appropriate, especially given the overall downward trend in students applying to pharmacy courses.

We would welcome clarity on how admissions requirements will fit into the often fast-paced process of students applying through clearing, especially given the increase in the number of students accepted onto MPharm courses via clearing in the last few years. We agree that rigorous selection and admission processes should be applied to all prospective student pharmacists, yet it is unclear how the behaviour checks, interactive components etc. would work within these tight timeframes.

16. Should we continue to allow unconditional offers?

Yes.

17. Please explain your response

We believe unconditional offers should still be allowed, though overuse by any School of Pharmacy should be investigated by the GPhC. Unconditional offers should only be offered in exceptional circumstances where a School determines through their admissions procedures and interviews that a student is exceptionally well-placed to study pharmacy, including to allow for non-standard entries in some cases.

Section 5: Experiential learning and inter-professional learning

18. Do you agree or disagree with our proposals in regard to:

- **Experiential learning (practical learning)?**
Strongly agree.
- **Inter-professional learning?**
Tend to agree.

19. Please explain your response

We agree that student pharmacists should have exposure to an appropriate breadth of patients and people in a range of environments (real and simulated) to enable them to develop the skills and the level of competency to achieve the relevant learning outcomes in Part 1 of these standards. We do, however, have some concerns around consistent availability of placements and learning in practice supervisors across all practice settings. It is therefore important that Schools of Pharmacy, students, employers and funders work collaboratively to develop models for learning in practice which will work for all parties across multiple sectors and that funding for these programmes incentivises involvement from high-quality placement providers.

We support the proposals to integrate student pharmacists with students from other healthcare professions at an early stage and throughout their undergraduate programme to improve awareness and appreciation of different skills and roles within a multidisciplinary team, however many universities may find the implementation of this to be very challenging, therefore further consideration needs to be given to the practicality of such a requirement.

Section 6: Learning in practice (preregistration) supervision

20. Do you agree or disagree with our proposal to replace the current four tutor sign-offs with more regular progress meetings between learning in practice supervisors and student pharmacists?

Strongly agree.

21. Please explain your response

This will be necessary to track progress more closely and to give training providers and students more flexibility around how experiential learning and learning in practice are delivered.

22. Do you agree or disagree with our proposal to replace the current pre-registration performance standards with the learning outcomes stated in Part 1 of the revised standards?

Strongly agree.

23. Please explain your response.

Having one set of learning outcomes across the integrated education and training period is a practical approach to ensure consistency for students in the multiple environments in which they will learn and train.

Section 7: Impact of the standards

24. Do you think our proposals will have a negative impact on certain individuals or groups who share any of the protected characteristics?

No.

25. Do you think our proposals will have a positive impact on certain individuals or groups who share any of the protected characteristics?

No.

26. Please describe the impact and the individuals or groups that you have ticked in questions 25 and 26.

N/A.

27. Do you think any of the proposed changes will impact – positively or negatively – on any other individuals or groups? For example, student pharmacists, patients and the public, schools of pharmacy, learning in practice providers, pharmacy staff, employers.

Yes.

28. Please describe the impact and the individuals or groups concerned.

The impact of an integrated degree programme on future student pharmacists will be substantial, especially the financial impact as tuition fees and living costs continue to rise.

The impact of these plans on Schools of Pharmacy will be significant, in particular in securing and planning sufficient placements for student cohorts across multiple settings.

There will also be an impact on placement providers such as community pharmacy contractors and their teams. The integrated programme must be at least cost neutral to training providers, as higher cost will be a clear disincentive for training providers to be involved. Whilst there may be an assumption that current pre-registration pharmacist employers will continue to be involved in an integrated programme, this may not be the case and therefore it is vital that training providers are communicated with so informed decisions can be made.

Training providers may potentially experience a higher workload associated with the integrated programme due to the need to repeatedly provide support for new student pharmacists (as detailed in criterion 7.1) and the training that will be involved in just “learning the ropes” each time a new student starts a placement. This will need to be considered and a sustainable funding model introduced to support all involved in the initial education and training of pharmacists.