

GPhC Consultation on revisions to education and training requirements for pharmacist prescribers

Questions

Question 1: Should the two-year time requirement for entry to free-standing pharmacist independent prescribing training be removed?

- Yes
- No
- Don't know

The CCA welcomes changes to the initial education and training of pharmacists and supports work to ensure newly qualified pharmacists qualify as prescribers on registration. We also recognise the need to ensure appropriate “bridging programmes” to support newly qualified pharmacists who join the register during the transitional phase to train as prescribers. The removal of the two-year requirement is crucial to ensuring this can be rolled out.

We recognise the necessity to upskill the existing workforce and support the proposal for applicants to provide evidence of their suitability to enter training. We would, however, like to take this opportunity to urge consistency between HEIs with regards to what evidence of suitability looks like to ensure a fair process.

We also note the current challenges regarding designated prescribing practitioner (DPP) resource, which will only increase in the coming months. We would welcome clarification of how this is being addressed.

We propose to change the wording in the entry requirements in relation to the experience for entry to a free-standing independent prescribing course and separate it into two distinct points:

1. Applicants must have relevant experience in a pharmacy setting and be able to recognise, understand and articulate the skills and attributes required by a prescriber to act as the foundation of their prescribing practice whilst training.

2. For the purposes of developing their independent prescribing practice applicants must identify an area of clinical or therapeutic practice on which to base their learning.

This will enable those with limited experience in relation to one area of clinical specialty to enrol onto the free-standing independent prescribing courses as well as support the desire of many of the key pharmacy stakeholders to promote generalist prescribing as a starting point.

The course providers will still require their students to identify an area of clinical or therapeutic practice, but this could include common clinical conditions for example. The skills and attributes of a prescriber will be covered in the course and the purpose of the defined clinical or therapeutic practice area is to allow the student to focus their learning but does not mean they are restricted to that area of practice upon qualification.

Question 2. Should the requirement to have relevant experience in a specific clinical or therapeutic area be removed and replaced with the requirement to have relevant experience in appropriate clinical setting(s)? *

- Yes

- No
- Don't know

We support this proposal which will allow people with limited experience in a clinical area to enrol on IP courses.

To ensure consistency between providers and fairness for trainees we would welcome further clarity as to the interpretation of "relevant experience"

Question: 3: Should we retain the requirement that applicants must identify an area of clinical or therapeutic practice on which to base their learning? *

- Yes
- No
- Don't know

We support this proposal. Whilst the areas in which individuals can train as independent prescribers may need further consideration, in our view it should cover the core clinical areas, whilst allowing trainees to understand the depth and breadth of knowledge required to be competent in a specific clinical or therapeutic area.

It is noted the consultation document states, "employers will need to make sure that their IPs, once annotated on the register, are suitably trained and competent to prescribe and that a review of their competence is regularly carried out". Whilst we recognize existing GPhC guidance states employers should make sure pharmacist prescribers are competent and maintain their competencies in the area in which they prescribe, consideration should be given to consistency across employers and within the locum workforce. Consideration should also be given as to where the responsibility sits in circumstances in which an individual has two or more employers, e.g. as part of a portfolio career.

Question 4: We want to understand whether our proposals may have a positive or negative impact on any individuals or groups sharing any of the protected characteristics in the Equality Act 2010.

- Age: Yes - positive impact
- Disability Yes - positive impact
- Gender reassignment: Yes - positive impact
- Marriage and Civil partnership: Yes - positive impact
- Pregnancy and maternity: Yes - positive impact
- Race: Yes - positive impact
- Religion or belief: Yes - positive impact
- Sex Yes - positive impact
- Sexual orientation: Yes - positive impact

The removal of barriers and the acceleration of speed at which individuals can achieve certain qualifications has the potential to have a positive impact on all protected characteristics.

In view this is particularly apparent when reaching career milestone is time sensitive, e.g. for individuals you are looking to progress quickly, this might include mature students or in situations of pregnancy or maternity.

The removal of the two-year requirement also supports the development of newly qualified pharmacists who will often fall into younger age brackets.

Question 5: We also want to know if our proposals will have an impact on other individuals or groups (not related to protected characteristics) - specifically, patients and the public, pharmacy owners and employers, pharmacy professionals, and pharmacy students and pre-registration trainees.

- Pharmacy owners/employers: Yes - positive impact
- Pharmacy professionals: Yes – positive impact
- Pharmacy students/pre-registration trainees: Yes - positive impact
- Patients and the public: Yes- positive impact

Pharmacy professionals/students and trainees: In our view the changes outlined in the document will have a positive impact on current and future pharmacy professionals.

Patients and the public: In our view the changes outlined in this document may have a positive impact on patients and the public, if increased numbers of pharmacists qualifying as IPs, aligns with an increase in the delivery of clinical services in community settings. If not, it may have a negative impact as highly qualified staff may seek opportunities to use skills in alternative settings, which in some cases be less accessible for patients.

Pharmacy owners and employers: As an employer group we support the direction of travel to better utilise the clinical skills of pharmacists, including through prescribing. We welcome the efforts made by the regulator to enable pharmacists to train as independent prescribers, which in our view will have a positive impact.

Whilst recognising it is not in the remit of the GPhC we would like to note the need for appropriate funding to allow pharmacists to train as IPs. There will also need to be assurances of commissioned services to allow pharmacists to use their skills in the community setting. Without services, there is a risk that community pharmacists would leave for settings in which they can use their new skills, clearly this would have a negative effect on employers and pharmacy owners, as well as subsequent impact on patients if access is limited.