

Migration Advisory Committee
2nd Floor
Fry Building
2 Marsham Street
London
SW1P 4DF

02 November 2012

Dear Migration Advisory Committee

Call for evidence by the Migration Advisory Committee on the review of the Shortage Occupation Lists for the UK and Scotland and Creative Occupations.

The Royal Pharmaceutical Society (RPS) is the professional body for pharmacists in Great Britain. We are the only body that represents all sectors of pharmacy in Great Britain. The RPS leads and supports the development of the pharmacy profession including the advancement of science, practice, education and knowledge in pharmacy. In addition, we promote the profession's policies and views to a range of external stakeholders in a number of different forums.

The RPS welcomes the opportunity to respond to the call for evidence and will address the areas that the MAC has requested i.e.: skilled, shortage, sensible.

1. Skilled

As the MAC has only requested evidence on skill in relation to job titles within occupations not skilled to NQF6+ the RPS is not submitting evidence for this area as pharmacists meet this skill level.

2. Shortage

Although there are some reported shortages in specific localities and sectors (e.g. reported 2011 vacancy rates in the NHS overall for **pharmacists** at Band 6 were 11.4% across England and 19.4% across Wales) the RPS does not believe that there is any evidence for proposing that pharmacists be included on the MAC's recommended shortage occupation list.

3. Sensible

There is no evidence that the pharmacist workforce meets the MAC's sensible criteria for inclusion on its shortage occupation list. Indeed, pharmacy employers are using alternatives to non-EEA migrants including: investment in technology, training the existing resident pharmacy workforce (there is an increasing number of UK pharmacy graduates available) and when necessary and appropriate the recruitment of employees from the EEA labour market.

As pharmacists are not currently listed on the UK's Shortage Occupation List (UK SOL) the RPS does not have a view on the sunset clause (i.e. the removal of occupations on the UK SOL that have been on the list for longer than a given period). Also the RPS has no comment on the case for the continued inclusion within Tier 2 of the creative occupations which are not skilled to NQF6+.

The RPS supports the exclusion of pharmacists (including pre-registration trainee pharmacists) from the Shortage Occupation Lists. Although there are some shortages in a few specific localities and sectors, the growth in the number of pharmacy graduates, anecdotal evidence of downward pressure on locum pharmacist wages and reduced vacancy rates for pharmacists working in the NHS would

suggest that increasing immigration from outside the EEA would not be a sensible approach to dealing with these specific shortages. Indeed, other approaches such as reviewing skill mix, local pay premia, offering staff development opportunities, mapping career pathways etc. are more appropriate ways of dealing with shortages and the Tier 2 route is still available should all else fail.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Duggan', with a horizontal line extending to the right.

Dr Catherine Duggan
FRPharmS, PhD, BPharm (Hons) Director of Professional Development and Support