



General Pharmaceutical Council
25 Canada Square
London
E14 5LQ

February 2017

Dear Colleague

Consultation on the initial education and training standards for pharmacy technicians

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 this consultation and has answered the questions asked by the GPhC in its discussion paper as follows:

Question 1: IET standards for pharmacy technicians – learning outcomes: Are these the right outcomes, at the right level?

We agree that these are broadly the right learning outcomes at the right level. However, the RPS takes the view that there are some learning outcomes that overlap with the IET of pharmacists and although there is a statement that there are differences in the scope and level of training between pharmacists and pharmacy technicians there are some e.g. medicines optimisation activities that the public and the profession will consider to be only appropriate for a pharmacist to undertake.

Outcomes 2, 26, 30 should be reviewed to provide greater clarity on the level of activity undertaken so that patient safety can be ensured.

We also suggest amending the following outcomes to read:

- 4. Give the person relevant information in a way they can understand
- 12. Make judgements in the best interests of people
- 24. Support the Pharmacist to provide a safe, effective and responsive pharmacy service
- 25. Take personal responsibility for the technical aspects of medicines supply
- 27. Confirm the accuracy of supply of a person's medicines for use and ensure sufficient supply
- 29. Assess the quantity of medication a person has and order more medicines and products if needed
- 31. Order, receive, maintain and carry out the technical aspects of the supply of medicines and other pharmaceutical products safely, legally and accurately
- 32. Receive prescriptions and check for their legal validity and clarity, taking action to deal with any technical problems
- 35. Apply basic pharmaceutical principles to the technical aspects of formulation, preparation and packaging of medicines and products
- 36. Under the Supervision of a Pharmacist issue prescribed items safely and effectively and take action to deal with discrepancies
- 40. Refer to the Pharmacist suspected adverse drug reactions and interactions

We note that there is some overlap between learning outcomes 27 and 29 ('Confirm the suitability of a person's medicines for use and ensure sufficient supply' and 'Assess a person's present supply of medication and order appropriate medicines and products'.)

For learning outcomes 29 to 31 we suggest that the outcome level needs to be 'shows how' rather than 'knows how' as this more realistically reflects current practice. The level set for learning outcome 37 should be 'shows how' rather than 'does' because in practice most pre-registration trainee pharmacy technicians are required to be second checked making it difficult to prove competency. Also for those pharmacy technicians changing sectors soon after registration there needs to be a level of assurance of competency as there are differences in the process of accuracy checking between sectors. This aligns with and is similar to the approach taken with the initial education and training standards for pharmacists in relation to independent prescribing.

Learning outcome 43 'Understand the importance of recording and learning from errors and near misses' should be 'shows how' rather than 'does'.

Question 2: Standards for IET course providers: Are these the right standards and criteria?

Yes. However, IET course providers may face challenges with adhering to the standards described under domain 7 as they are reliant on employers and the workplace providing the

necessary infrastructure and support for trainees. Further guidance from the GPhC may be warranted.

Pre-registration trainee pharmacy technicians will be able to train under the direction, supervision or guidance of a pharmacy technician or pharmacist.

Question 3: Do you have any comments about this proposed change and its potential impact?

The RPS supports this change as long as appropriate support is in place for the pharmacy technician who is responsible for the pre-registration trainee pharmacy technician, and appropriate checks are in place re: their suitability as a tutor i.e. qualifications/experience/mentorship competencies etc). Involving pharmacy technicians will be very positive in terms of the learner experience and the mentorship offered to the pre-registration trainee pharmacy technician should also enhance their understanding of the role and responsibilities required on registration). There are also benefits for the pharmacy technician acting in that role as they will be afforded the opportunity to provide evidence for professional development.

Question 4: Do you have any comments about whether we should keep the two-year work experience requirement or whether we should introduce a change, and about any potential impact?

The RPS does not support this change as it is not clear what safeguards would be put in place. Clarity needs to be given on the minimum number of hours training. The reason for this is there is not as rigorous assurance compared with the initial education and training standards for pharmacists (who don't have the option to complete their training more quickly due to the EU directive) and thus there could be a detrimental impact on public safety. There is also a risk that due to increasing demand for healthcare inappropriate pressure is directed on completing training early for reasons other than the capability of the pre-registration trainee pharmacy technician.

[Removing the option that current or recently registered pharmacists in Great Britain or Northern Ireland are able to register as a pharmacy technician automatically.](#)

Question 5: Do you have any comments about this proposed change and its potential impact?

The RPS supports this change as there are differences between the two professions and automatic registration made assumptions about prior learning.

Question 6: Do you have any comments about workplace training and the quality assurance of initial education and training?

As quality assurance is heavily weighted towards accreditation of courses there needs to be greater consideration of how to quality assure initial education and training and day-to-day workplace training. Further work needs to be undertaken to enable dovetailing of quality assurance between the GPhC and Health Education England/NHS Education for Scotland/Workforce Education and Development Service in Wales. The RPS supports the intention of the GPhC to issue guidance on the standards to course providers and would add that the GPhC should also have the authority to act in a timely manner if standards were found not to be adhered to.

Question 7: Do you think there is anything in the standards or suggested changes to the criteria for registration that disproportionately affects any particular group over others?

No. The RPS is satisfied that a full equality impact has been conducted.

Other comments

We would request that the GPhC takes into consideration the current situation in relation to the delivery of the underpinning knowledge programme within Scotland. The FE Colleges deliver the programme on a full-time basis which subsidises and allows the delivery to continue for the very small number of part-time, employed day-release students. Combining the knowledge and competence components into one single qualification has implications and

risks for Scotland, as numbers would potentially decrease and FE Colleges may question the viability of continuing to deliver the qualification in the future.

Yours sincerely