

04 November 2019

Migration Advisory Committee

Salary threshold and points-based system (PBS) commission: call for evidence

About you

1. What is the name of your organisation?

Royal Pharmaceutical Society

2. What is your email address?

Christopher.john@rpharms.com

3. Which of the following options best describe your reason for completing this form?

I am providing evidence of recruitment and salaries in the sector, on behalf of other organisations/members or as a recruitment business.

The questions that follow in this form are for those that have chosen the second option in question 3.

About your organisation

4. Which of the following best describes your organisation?

Other (please specify)

The Royal Pharmaceutical Society (RPS) is the professional membership body for pharmacists and pharmaceutical scientists 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.

Questions 5-12

Our response is on the basis that we represent members who work at pharmacy organisations across healthcare (NHS managed sector and contractors), academia, the pharmaceutical industry, secure environments, the armed forces and other sectors. We work closely with stakeholder organisations from Small and Medium-sized Enterprises to large corporations. These include community pharmacy organisations (large and small multiples as well as independents), NHS organisations (NHS Trusts and Clinical Commissioning Groups), universities and pharmaceutical industry (multinational corporations and smaller 'boutique' organisations.)

We engage with our members via our national boards, networks and expert advisory groups and have asked for evidence for salary threshold and points-based system commission. We have answered the MAC call for evidence questions for representative organisations. We received evidence from community pharmacy organisations, NHS organisations and a university.

Employment of migrant workers



13. To your knowledge, have the organisations you have engaged with recruited any of the following workers in the past 5 years: (Please select all that apply)

[Workers from EEA countries: the EEA includes all European Union (EU) countries plus Iceland, Liechtenstein and Norway. We also include Switzerland as part of our definition. Workers from non-EEA countries: workers from outside of EU countries plus Iceland, Liechtenstein Norway and Switzerland.]

UK and/or Irish workers ✓

Workers from EEA countries outside of the UK and/or Ireland ✓

Workers from non-EEA countries ✓

Don't know

14. In the next 12 months are they likely to recruit: (Please select all that apply)

UK and/or Irish workers ✓

Workers from EEA countries outside of the UK and/or Ireland ✓

Workers from non-EEA countries ✓

Don't know

15. Following on from the previous question, were these non-EEA workers recruited under the Tier 2 (General) visa system?

Yes some

Yes all ✓

No

Don't know

16. Are the salaries required by the Tier 2 (General) immigration rules generally:

Higher than what they would normally pay

About the same

Lower than they would normally pay

Don't know ✓

17. Have the organisations that you represent experienced any issues with Tier 2 (General) visa salary requirements? If so, what were they?

There are considerable costs associated with recruiting via Tier 2.

18. Have any of the Tier 2 (General) visa employees employed by your members (or organisations you represent) applied or tried to apply for settlement?

Yes

No

Don't know ✓

Salary thresholds

Our commission from the government asks us to consider both the mechanism for setting minimum salary thresholds and the appropriate level.

19. In general, was the settlement income threshold (currently £35,800)?

- Above their current salary
- About the same as their current salary
- Below their current salary
- Don't know** ✓

20. Please provide any additional views of Tier 2 (General) visa settlement

None

Salary thresholds

Our commission from the government asks us to consider both the mechanism for setting minimum salary thresholds and the appropriate level.

21. To what extent would the businesses/organisations you have engaged with agree or disagree with the following statements: (strongly agree, agree, neither agree nor disagree, disagree, strongly disagree)

There should not be a minimum salary threshold above the legal requirement (the national minimum wage)

If there is a salary threshold it should be applied universally across the economy and UK, with a few exceptions to keep the system simple

If there are salary thresholds, there need to be a variety to reflect employer needs

If you have an alternative model you wish to describe, please explain it here (in 200 words)

Don't know ✓

22. If there were tailored salary thresholds, to what extent would the businesses/organisations you have engaged with agree that they should be varied by: (strongly agree, agree, neither agree nor disagree, disagree, strongly disagree)

Sector

Region/country

New entrants/young workers

Occupation

Don't know ✓

23. Do the businesses/organisations you engage with most commonly think that jobs judged to be in shortage (such as those on the Shortage Occupation List) should have:

Higher salary thresholds compared to those not in shortage

The same salary thresholds compared to those not in shortage

Lower salary thresholds compared to those not in shortage

Don't know ✓

24. Do the businesses/organisations you engage with most commonly think that having a salary threshold equivalent to the 25th percentile of the full-time pay distribution for employees in that occupation is:

[25th percentile: 75% of full-time employees in an occupation earn the threshold amount or more, and 25% earn less]

Too high

About right

Too low

Don't know ✓

Please explain your answer (in 200 words)

We have received evidence from a community pharmacy multiple that the salary threshold puts pressure on salaries across the board though it was acknowledged that if set too low this could discourage applications via Tier 2. Conversely, a university reported that it could not recruit to an IT role that supports pharmacy education delivery because the salary is below £30,000 and therefore Tier 2 cannot be utilised. IT consultants are being used instead which increases costs. This suggests that a sector and/or occupation-based approach to salary thresholds may be helpful.

25. Do the businesses you engage with most commonly think that having a minimum salary requirement of £30,000 for an experienced full-time employee is:

Too high

About right

Too low

Don't know ✓

Please explain your answer (in 200 words)

The current average starting salary for a pharmacist is in the range: £26,500 - £32,000. For an experienced pharmacist the average salary is in the range: £32,000 - £41,000.

The current minimum salary requirement would allow recruitment via Tier 2 into an experienced pharmacist post.

26 What do you think should be counted towards the salary for assessing whether an individual meets the threshold? (Please select all that apply)

Company car/ travel allowance

Pension contributions

Employee equity ownership schemes

Part-time working patterns

Commission

Housing allowances

Other cash/non-cash remuneration please specify (in 200 words):

Don't know ✓

27. Following on from the previous question, please list your responses in order of importance with 1 being the most important and 6/7 being the least.

N/A

28. Are there any other issues we should consider? (in 200 words)

We have received evidence from two large multiple community pharmacies. One reported a chronic shortage of community pharmacists in every area outside of London now at peak times (winter pressures) of the year and throughout the year in South West, South West corridor, North East, Lakes and East Anglia. The other organisation also reported geographical challenges with recruiting pharmacists in all areas outside of Birmingham, Manchester and London.

Reasons for recruitment challenges that these employers gave included:

- fewer pharmacy graduates (declining numbers of MPharm students);
- no alternative to MPharm route to registration as a pharmacist (e.g. degree apprenticeship)
- low General Pharmaceutical Council registration assessment pass rate;
- locum driven community pharmacist market;
- increased opportunities in other sectors e.g. primary care, creating a drain;
- Brexit uncertainty – workers not certain about their right to remain.

29. Please attach any additional evidence you would like us to consider

The number of new registrants to the General Pharmaceutical Council’s register of pharmacists has remained stable over the last 3 years:

	Total no of new registrants	No of EEA new registrants	No of Non-EEA new registrants	Total no of registered pharmacists
2018/19	3,339	113	96	56,221
2017/18	3,255	103	71	55,256
2016/17	3,306	439	80	53,873

The table below shows the percentage of those pharmacists with a registration route of ‘EU/EEA’ out of all those active on the register within each year since 2011. The years below are financial years (e.g. the ‘2011/12’ year is from 1st April 2011 – 31st March 2012).

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Pharmacists (EU/EEA route)	5.9%	6.0%	6.2%	6.5%	6.8%	6.8%	6.4%

The total size of the EU/EEA pharmacist workforce in Great Britain has not seen big changes. There was a small decrease in 2017/18 of the percentage of pharmacists who originally registered via the EU/EEA route. The number of new registrant pharmacists via the EU/EEA route increased slightly in 2018/19, though this is unlikely to change the overall percentage on the register. The pharmacy profession’s reliance on EU/EEA nationals is difficult to assess. The percentage of EU/EEA pharmacists of the total number of pharmacists on the register is broadly similar to the percentages for nursing and medicine. Recruitment of EU/EEA nationals has been used for hard to recruit pharmacist posts. The impact of the proposed changes should be considered in the context of whether the Mutual Recognition of Professional Qualifications system remains in place and the approach the General Pharmaceutical Council take to recognition in response to any changes. A large drop in new nursing registrants from the EU/EEA has been

reported by the Nursing & Midwifery Council. However, this has been counter-balanced by increases in new registrants from the UK and outside the EU/EEA.

We have received reports in the last few years of concern that the overall number of new registrants in Great Britain will fall because of a variety of factors (students are applying for other courses, reduced numbers of trainees passing the GPHC's registration assessment etc) and this will affect the supply of pharmacists when demand is increasing.

NHS Education for Scotland in conjunction with Community Pharmacy Scotland undertook a community pharmacy staff and vacancies survey for the week commencing 04 March 2019. The response rate was 100% and it reported a reduction in the number of Full Time Equivalents of community pharmacists with a movement into new roles in primary care. Overall the vacancy rate for community pharmacists in Scotland stands at 4.19%. However, there are higher vacancy rates reported for rural and coastal areas:

- Highland 13.85%
- Orkney 13.16%
- Shetland 14.71%

A similar survey conducted in 2017 in community pharmacy in England with a participation rate of 86% reported a pharmacist vacancy rate of 3-4% with regional variations. A survey has been conducted in community pharmacy in Wales in March 2019, but the results are awaited.

Australian Points Based System

30. The Government is considering adopting an Australian type Points Based System. In your opinion, please tell us the relative importance of the following characteristics typically used to award points to migrants by ranking them where 1 is the most important and 8/9 is the least important.

Language proficiency

Having studied in the UK

Work experience

Age

Education attainment

Having a job offer

Salary

Priority occupations

Other, please specify

We do not have enough evidence to rate the above characteristics. However, we would advise that patient safety is the most important factor to consider and therefore language proficiency, work experience and education attainment are therefore the most relevant characteristics.

MAC stakeholder database

31. Would you like to be added to our stakeholder database for future research purposes and updates on MAC work?

Yes ✓

No

32. We may require follow-up to clarify or supplement your responses to the online form, or for follow-up research.

Do you consent to be contacted to clarify or supplement your responses?

Yes ✓

No

This is the end of the form