

## Response ID ANON-FFVG-7BFP-R

Submitted to NHSScotland 'Once for Scotland' Workforce Policies  
Submitted on 2024-03-06 09:26:50

### 1. Equality, Diversity and Inclusion Policy – Consultation Questions

1 Do you feel there are any gaps in the policy?

Yes

Please provide further detail:

The Royal Pharmaceutical Society published a report in February 2024 Closing the awarding and attainment gap for Black trainees in pharmacy. The report calls for bold efforts from leaders and individuals to acknowledge disparities, enhance cultural competence, and create inclusive environments that offer everyone a fair chance at success.

Differential attainment is the variation in attainment between groups who share a protected characteristic, for example, ethnicity, gender and disability. Differential attainment has been reported in medical education since the 1990s, with students from non-white backgrounds performing worse than those of White British heritage.

Awareness of a registration assessment differential attainment gap in pharmacy was first reported in 2013 when the General Pharmaceutical Council (GPhC), the regulator for pharmacy professions, began collecting data on candidate performance in the registration assessment according to self-declared ethnicity data. The registration assessment is taken by trainee pharmacists at the end of their foundation training year. These trainees have completed an accredited MPharm degree programme in England, Scotland and Wales and undertaken a subsequent foundation training programme, which gives trainee pharmacists the opportunity to develop and demonstrate the skills, knowledge, and behaviours they need to practise to the standards expected of a pharmacist in real-life scenarios.

In Great Britain, in 2023, for the White: British cohort, the pass rate for first time sitters in the summer registration assessment was 90%, while for the Black or Black British: African cohort it was 67%. The attainment gap was 23%.

The RPS calls for organisations such as NHS Scotland, who provide placements for undergraduate pharmacy student experiential learning and foundation trainee (pre-registration) pharmacist positions to commit to:

- Ensuring high quality experiential learning and foundation training placements through quality assurance
- Encourage the development of mentoring, networks and role models in the workplace training environment to inspire current and prospective trainees
- Recognise and celebrate diversity
- Improve tutor training to include cultural competence and unconscious bias training
- Provide protected learning time for foundation trainees
- Improve data collection, analysis and data sharing
- Share best practice across training environments
- Provide support during the transition from pharmacy student to foundation training placement

Describing some of the above factors into the policy would support employers and staff to advance equality of opportunity, and foster good relations between different groups as described in the policy aim.

2 Do you feel there are any gaps in the proposed list of supporting documents?

No

Please provide further detail:

3 Do you have any other comments to make on the policy?

Yes

Please provide further detail:

The Equality, Diversity and Inclusion Policy has a focus on how to respond when things go wrong and it would be beneficial for employers, managers, employees and patients, for the policy to also cover how to get it right. It should also be clearer that discrimination and bullying will not be tolerated by the employer. The employer also needs to clearly articulate the importance of collecting EDI data and how it will be used. This is important in ensuring employees feel safe in sharing their protected characteristic data.

Another thing that is missing is how they're going to be proactively checking for systemic and institutional biases and discrimination through policies, procedures and services e.g. ensuring equality impact assessments are conducted.

4 Do you have any views on the potential impacts of this policy on equalities groups?

Yes

Please provide further detail:

See comments above

### 2. Gender-based Violence Policy – Consultation Questions

1 Do you feel there are any gaps in the policy?

No

Please provide further detail:

2 Do you feel there are any gaps in the proposed list of supporting documents?

No

Please provide further detail:

3 Do you have any other comments to make on the policy?

No

Please provide further detail:

4 Do you have any views on the potential impacts of this policy on equalities groups?

No

Please provide further detail:

### 3. Facilities Arrangements for Trade Unions and Professional Organisations Policy – Consultation Questions

1 Do you feel there are any gaps in the policy?

No

Please provide further detail:

2 Do you feel there are any gaps in the proposed list of supporting documents?

No

Please provide further detail:

3 Do you have any other comments to make on the policy?

No

Please provide further detail:

4 Do you have any views on the potential impacts of this policy on equalities groups?

No

Please provide further detail:

### 4. Personal Development Planning and Performance Review Policy – Consultation Questions

1 Do you feel there are any gaps in the policy?

Yes

Please provide further detail:

The Royal Pharmaceutical Society believes that all pharmacists should be able to undertake educational and research activities during protected time within their working hours. One of our policy recommendations is that employers should include protected time for educational and research activities within job plans and ensure employees can actually work to these job plans in day-to-day practice. The Personal Development Planning and Performance Review Policy could expand the “Allow employees protected time to prepare for their appraisal” responsibility for managers to “Allow protected time for PDP preparation and include statutory, mandatory and professional development training.”

Protected learning time (PLT) is needed to give pharmacy professionals time to develop clinical and non-clinical capabilities across the workforce, particularly around education and research as well as leadership. Many pharmacists are currently unable to engage in professional development activities as part of their working time. One of the key reasons for this is the need to ensure the delivery of frontline clinical services to patients. Pharmacists historically have focussed their professional development on developing clinical capabilities and have not dedicated time to developing their leadership / management, education and research capabilities. As well as being clinicians, pharmacists are also educators, researchers and leaders. They need protected time to develop these skills and support others in practice. Time needs to be liberated outside of patient facing activities so pharmacists can develop alongside other healthcare professionals. This policy is the ideal vehicle to ensure this is supported within NHS Scotland.

2 Do you feel there are any gaps in the proposed list of supporting documents?

Yes

Please provide further detail:

The guides for employees and managers could include information and examples of professional development such as credentialling through professional bodies. For pharmacists this would be the Royal Pharmaceutical Society.

3 Do you have any other comments to make on the policy?

Yes

Please provide further detail:

Consider adding General Pharmaceutical Council (GPhC) to the list of regulatory bodies in section 4.5.18.

4 Do you have any views on the potential impacts of this policy on equalities groups?

No

Please provide further detail:

## 5. Employment Checks Policy – Consultation Questions

1 Do you feel there are any gaps in the policy?

No

Please provide further detail:

2 Do you feel there are any gaps in the proposed list of supporting documents?

No

Please provide further detail:

3 Do you have any other comments to make on the policy?

No

Please provide further detail:

4 Do you have any views on the potential impacts of this policy on equalities groups?

No

Please provide further detail:

## 6. Fixed-Term Contract Policy – Consultation Questions

1 Do you feel there are any gaps in the policy?

No

Please provide further detail:

2 Do you feel there are any gaps in the proposed list of supporting documents?

No

Please provide further detail:

3 Do you have any other comments to make on the policy?

No

Please provide further detail:

4 Do you have any views on the potential impacts of this policy on equalities groups?

No

Please provide further detail:

## 7. Secondment Policy – Consultation Questions

1 Do you feel there are any gaps in the policy?

No

Please provide further detail:

2 Do you feel there are any gaps in the proposed list of supporting documents?

No

Please provide further detail:

3 Do you have any other comments to make on the policy?

No

Please provide further detail:

4 Do you have any views on the potential impacts of this policy on equalities groups?

No

Please provide further detail:

## 8. Redeployment Policy – Consultation Questions

1 Do you feel there are any gaps in the policy?

No

Please provide further detail:

2 Do you feel there are any gaps in the proposed list of supporting documents?

No

Please provide further detail:

3 Do you have any other comments to make on the policy?

No

Please provide further detail:

4 Do you have any views on the potential impacts of this policy on equalities groups?

No

Please provide further detail:

## About you

1 What is your name?

Name:  
Fiona McIntyre

2 Are you responding as an individual or an organisation?

Organisation

3 What is your organisation?

Organisation:  
Royal Pharmaceutical Society Scotland

4 Further information about your organisation's response

Please add any additional context:

5 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

6 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

7 What is your email address?

Email:

Fiona.McIntyre@rpharms.com

8 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

1 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: