**PROPOSAL CONSULTATION FORM FOR PHARMACIST**

This survey invites you to comment on Pharmacist proposal that has been developed by the relevant Trailblazer group.

**Questions**

1. Do you support the development of the Apprenticeship Standard set out in the proposal?

Yes

Partially

No

**Comment here**

It is our understanding that the use of an apprenticeship model is intended to provide an opportunity for increased experiential learning – from the information listed, it refers to a 60month duration, however the length of time spent on knowledge acquisition (in a University setting) compared to in-practice learning is not specified. From our understanding of other apprenticeships, it appears that the majority of time will be spent in practice or in “on the job” learning. An emphasis on experiential learning was proposed by Guile and Ahamed (2011) who described the need for continuous re-contextualisation of knowledge and skill – in *different* contexts – as supported by Evans (2010); this proposal is scant, and we do not know if the intention is for the apprentice to experience significant training in all areas of practice, but we suspect it will not. The recent GPhC consultation on the initial training of Pharmacists (closed April 2019) offered the professional the opportunity to comment on the integration of the longest period of experiential training in the initial training of pharmacists, the pre-registration year, and we welcome the opportunity to explore the best method of supporting the development of clinical skills and competence in multiple contexts across the practice of pharmacy. The GHP support the need for learning in context and during participation with multiprofessional colleagues in a “community of practice”, however the literature does not support the development of an apprenticeship style model of education to support the level of practice currently offered by pharmacists in all areas of practice. On this basis we cannot support a model utilising apprenticeship for the education, training, knowledge, expertise, roles and responsibilities for the profession of a Pharmacist.

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1. Do you recognise this occupation and is it in demand in the labour market?

Yes

Partially

No

**Comment here**

The role of the Pharmacist is in high demand as a respected profession with high standards of knowledge based expertise. The recent expansion of the Pharmacist workforce in a relatively new setting, GP practice, has meant that there has been a shift in the workforce from other, more established settings in Community Pharmacy as well as secondary care. This has left a temporary shortfall in some areas. However, there are currently 32 schools of Pharmacy in the UK as well as 3 in the Republic of Ireland, all of which produce exemplary MPharm graduates annually. Furthermore, initiatives such as the NHS Long Term Plan will mean that the workforce in these new settings will need to increase from the circa 1,000 employees to circa 7,500 over the next 3 years or so.

1. Do you think the occupation proposed is sufficiently skilled to require employment and training of at least 12 months duration, with 20% of the time in off-the job training?

Yes

Partially

No

**National Qualifications Framework Equivalency Table**
The table in [this link](https://www.gov.uk/what-different-qualification-levels-mean/compare-differentqualification-%20levels) explains the National Qualifications Level and their equivalent.

**Comment here**

We are unclear what this question refers to? We believe that it is evident that Pharmacists are currently more than “sufficiently skilled” to require training at least 12 months duration, if this refers to the “whole” of the undergraduate training as the existing qualification for pharmacists requires the attainment of a 4 year undergraduate Masters in Pharmacy as well as a 1 year in practice experiential learning placement (the pre-registration year), followed by professional registration with the GPhC or PSNI. We do not believe that any apprenticeship standards can deliver the requirements to become a registered Pharmacist as we believe that the current process of University training to Masters Level followed by GPhC or PSNI approved postgraduate training and GPhC or PSNI examination is the correct method of delivering the training required to become a registered Pharmacist.

1. Are you aware of any other existing or proposed apprenticeship standards that could deliver this occupation?

Yes

Partially

No

**Comment here**

We don’t believe that any apprenticeship standards can deliver the requirements to become a registered Pharmacist and are not aware that there are any in proposal or existence.

1. Does the occupational profile define what is needed to undertake the occupation competently? If ‘No’, please give details of what it should include.

Yes

Partially

No

**Comment here**

We do not believe that the existing occupational profile adequately reflects what is required to develop a Pharmacist at the level of clinical skill and knowledge required in the modern NHS, in any setting. For example, there is reference within the application that “Pharmacists are not required to diagnose or manage medical care” –despite the extension of prescribing rights to Pharmacists since 2006. If we consider the existing GPhC or PSNI initial training and education standards for pharmacists (2011), they include;

10.2.2a “Identify and employ the appropriate diagnostic or physiological testing techniques in order to promote health”.

10.2.2f “Provide, monitor and modify prescribed treatment to maximise health outcomes”.

10.2.4c “Identify and employ the appropriate diagnostic and physiological testing technique to inform clinical decision making”; all of which support the prescribing role of Pharmacists.

The draft standards consulted upon in 2019, go further and explore a future Pharmacist graduating with prescribing rights.

We believe that this profile is a retrograde step away from where the profession has developed over the past 20 years and believe that the education and training provided by the approved undergraduate HEI providers delivers the appropriate level of science, skills and behaviours to underpin the wide variety of roles Pharmacists have now and into the future. The GPhC or PSNI approved postgraduate Pre-Registration Pharmacist training uses both individual work-based assessment and a national examination to test trainees’ abilities to demonstrate the knowledge, skills and behaviours necessary to provide safe and effective care as a Pharmacist over a 52 week program. It is unclear how the proposed apprenticeship links with the current registration requirements for Pharmacists; will the apprenticeship also include the GPhC or PSNI examination?

1. Do you consider the proposed occupation to be sufficiently wide-ranging to allow an apprentice to develop transferable skills that will enable them to perform this role across the wider sector?

Yes

Partially

No

**Comment here**

We believe that the education and training provided by the approved undergraduate HEI providers to Masters Level followed by GPhC or PSNI approved postgraduate training and GPhC or PSNI examination delivers the appropriate level of science, skills and behaviours to underpin the wide variety of roles of Pharmacists. The GPhC or PSNI approved postgraduate Pre-Registration Pharmacist training uses both individual work-based assessment and a national examination to test trainees’ abilities to demonstrate the knowledge, skills and behaviours necessary to provide safe and effective care as a Pharmacist over a 52 week program. It is unclear how the proposed apprenticeship links with the current registration requirements for Pharmacists, will the apprenticeship also include the GPhC or PSNI examination.

1. **Do you have any other comments?**

The Guild of Healthcare Pharmacists (GHP) represents UK wide around 4,500 Pharmacists including the majority of hospital Pharmacists, Pharmacists employed by Primary Care Organisations and Pharmacists employed by other public bodies such as NHS England, Commission Quality Commission etc. The Guild is part of the health sector of Unite the Union.

This proposal has come with minimal details and a short time-frame (which also coincides with the typical Easter holiday period) for the GHP to consult with and respond on behalf of our members. From our time limited research, there has been no formal approach to widely engage with the profession, it appears to have been a surprise to most employers, professional bodies, representative organisations and Higher Education Institutes. As a result we are very interested in who has been involved in the development of the proposal, as a registered Pharmacist is able to work in a wide range of organisations, and we are concerned that the GHP has not been involved in the process. In the very recent GPhC consultation on initial education and training standards for Pharmacists, this proposal was not alluded to in any of the plans outlined in that consultation. It is also unclear how this approach to education would align with the NHS Long Term Plan and other national directions for health.

Although we have had very limited time to work with our members to contribute to this consultation, we have answered the questions as well as practically possible and as a result, we would welcome a more detailed proposal and a longer engagement period, to enable a more thorough response.

We oppose the development of the apprenticeship for a number of reasons;

• The apprenticeship will remove the training of Pharmacist professionals in the 21st century from a University-led model, such as received by colleagues in Medicine, Dentistry and Veterinary Medicine to a model traditionally associated with technical occupations. We are unclear what advantages, if any, this move will offer the profession as a whole.

• Though we have little detail, we believe that entry standards and potentially the entire initial education and training of Pharmacists could be influenced by large corporate employers who have supported this proposal. If this is a cost reduction strategy by these employers, in an effort to de-value the profession to justify reducing wage costs, we cannot support the reduction in standards and de-professionalisation that is associated with this methodology.

• Pharmacists are experts in medication use in patients, in patient populations, in health systems and in research and development. As such the role of a Pharmacist requires a full understanding from base principles of the use and action of medication.

• University training to Masters Level followed by GPhC or PSNI approved postgraduate training and GPhC or PSNI examination is required for this occupation to fulfil its role in management of medication use in patients, in patient populations, in health systems and in research and development.

• We believe that this proposal may be being supported by large employers who believe that by supporting the proposal to change the current requirements to becoming an apprenticeship is a way of recovering their 0.5% apprenticeship levy. We believe that this is highly inappropriate and is being abused both inside the NHS and external to the NHS.

• The outline duties on page 3 of the consultation do not accurately reflect the wide variety of roles undertaken by Pharmacists, there appears to be a lack of acknowledgement of the science that underpins these and other roles e.g. pharmaceutics, pharmacology, microbiology etc. Additionally there is little covering research and development that advances the profession and medicine development.

• The role of the Pharmacist is constantly developing and there appears to be an assumption that Pharmacists are only experts in medicines, the management of therapeutics and ongoing care, and are not required to diagnose and manage medical care. This is simply no longer true; many Pharmacists in the managed sector are practicing non-medical prescribers and deliver both roles. The current plan for the expansion of the role of the Pharmacist in many health care systems, taking some roles from doctors, requires the Pharmacist to have the skills to diagnose and manage medical care, including prescribing.

• Being a Pharmacist is not a technical profession. In Community Pharmacy Practice, Pharmacists deliver a wide variety of minor ailment schemes, emergency hormonal contraception and smoking cessation schemes and are diagnosing, assessing, consulting with patients to facilitate a supply of the relevant medicine.

• We are concerned that the current degree will be devalued and additionally current undergraduates and newly-qualified pharmacists (in last 2-3 years) will all have a large student loan/debt to pay off. We do not see any evidence within the proposal as to how this would be managed.

• While we believe that the proposed program is not fit for purpose, the proposed contact time of 445 training days in a 60 month apprenticeship and decentralised educational model cause additional concern as we believe that there is an inability to deliver the training within a currently stretched NHS, as there is insufficient capacity in the system to deliver the training required by the proposal.

**APPRENTICESHIP CONSULTATION RESPONSE FORM**

Thank you for filling out the form. Your response has been recorded.

Back to [consultations page](https://www.instituteforapprenticeships.org/developing-new-apprenticeships/apprenticeship-standard-consultations/)

**ABOUT YOU**

**What is your name?**

**What is your organisation?**

Guild of Healthcare Pharmacists (Unite the Union)

**Please select an option from the list below that best describes you as a respondent.**

Trade Union

**Would you be happy for us to contact you for further information if required?**

Yes

**If this Standard is approved for development, would you be happy for us to contact you as part of wider consultation?**

Yes

**Contact Section**

Please provide the best way to contact you?

**Phone**

**Email**

This survey invites you to comment on Pharmacist proposal that has been developed by the relevant Trailblazer group.

You can access the proposal download at the bottom of this page

**Questions**

**Do you support the development of the Apprenticeship Standard set out in the proposal?**

No

**Comment here**

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*Please provide details of what it should include in the comment box below*

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**Consultation Document Key Information**

**This occupation is found in:**

community pharmacies, hospitals, pharmaceutical production or sales within the pharmaceutical industry, prisons, primary care organisations, universities in teaching and research, the military and pharmacy organisations.

**The broad purpose of the occupation is:**

to be responsible, accountable clinicians who are experts in medicines. The Pharmacist occupation is regulated by the General Pharmaceutical Council (GPhC) and they are autonomous practitioners delivering person centred care. The broad purpose is to be accountable for and undertake any work or give advice in relation to the preparation, assembly, dispensing, sale, supply or use of medicines, the science of medicines, the practice of pharmacy or the provision of healthcare. As an expert of medicines, a Pharmacist will integrate the science and lead the practice of pharmacy to ensure both the quality and supply of medicines to patients is within the statutory regulation.

Pharmacists work both individually and as part of a multi-disciplinary team and have a high level of autonomy. They work in the context of continual change, challenging environments, different models of care delivery, a diverse population, innovation and rapidly evolving technologies. Pharmacists can find themselves working with people from birth to end of life and in a wide range of settings.

The actual work setting will determine the specific areas of activity that the Pharmacist undertakes, but typically their role will include the following;

\* Ensure patient safety by advising patients about medicines, including how to take them, reactions which may occur, answering patients' questions and ensuring that the medicines prescribed to patients are safe and effective

\* Supervise the medicines supply chain and ensure pharmacy premises and systems are fit for purpose and meet statutory regulation

\* Advise the multi-disciplinary teams about safe and effective medicines use, and the safe and secure supply of medicines

\* Use specialised skills to address problematic and complex situations

\* Critically reflect on practice and maintain professional standards

\* Pharmacists make an important contribution to the promotion of health, health protection and the prevention of ill health by empowering the population to make informed decisions

\* Provide services which enable patients to be fully involved in their own care and make shared decisions about their treatment and medicines

\* Supervise and lead by example, and contribute to the education, training and professional development of the team including pharmacy technicians and/or of others

**In their daily work, an employee in this occupation interacts with:**

patients, people, carers, healthcare professionals

**An employee in this occupation will be responsible for:**

patient safety, supervision of medicine supply, advising health and social care professionals, staff and resources

**Transferability**

The Institute expects that being competent in the duties you have listed in this proposal will mean that an individual will be able to undertake the occupation in all relevant types of employer. Please outline the steps you have taken to ensure that this will be the case.

The proposal has been developed through consultation with a range of employers, the professional body, regulator and Higher Education Institutes. The proposal has also been shared with the employers on the group for comments prior to submission. As this is a regulated profession, a registered Pharmacist is able to work in a wide range of organisations as seen in the job adverts attached.

**Stand-alone occupation**

Please confirm that the proposed apprenticeship relates to a stand-alone occupation and explain how it will fit in with any associated apprenticeship standards.

This is a standalone occupation which is regulated by the General Pharmaceutical Council.

This is fundamentally distinct from the Advanced Clinical Practitioner standard which required an apprentice to be a registered professional with the Nursing and Midwifery Council and Healthcare professional Council. Pharmacists are experts in medicines and therapeutical management and ongoing care, they are not required to diagnose and manage medical care, they will also provide advice to patients on medicines management. This is also distinct from the Pharmacy Technician which is also a GPhC registered profession, however a Pharmacist has a higher level of education and a Pharmacy Technician works under the supervision of a Pharmacist.

**Typical job titles**

Pharmacist