



Community
Pharmacy
Scotland

**GPhC Consultation on Education &
Training Standards for
Pharmacist Independent Prescribers**

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Who are Community Pharmacy Scotland (CPS) & what do they do?

Who we are

We are the organisation which represents community pharmacy contractor owners in almost every aspect of their working lives, and are the voice of these vital healthcare professionals as they deliver pharmaceutical care to the people of Scotland.

We are empowered to represent the owners of Scotland's 1256 community pharmacies and negotiate on their behalf with the Scottish Government. This covers all matters of terms of service and contractors' NHS service activity including remuneration and reimbursement for the provision of NHS pharmaceutical services.

What we do

We work with the Scottish Government on the development of new pharmaceutical care services and ensure that the framework exists to allow the owners of Scotland's community pharmacies to deliver these services.

The Scottish community pharmacy contract puts the care of the individual right at its centre and with its focus on pharmaceutical care and improving clinical outcomes, community pharmacy contractors and their employee pharmacists are playing an increasingly important role in maximising therapeutic outcomes and improving medicine safety. Community pharmacy is at the heart of every community and plays an important part in the drive to ensure that the health professions provide the services and care the people of Scotland require and deserve.



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Section 1: Learning outcomes

Q1: Considering the full set of learning outcomes in Part 1 of these draft education and training standards, to what extent do you agree that these are appropriate learning outcomes for a pharmacist independent prescriber in training?

We believe that the proposed learning outcomes are, for the most part, appropriate for and proportionate to the role of a qualified Pharmacist Independent Prescriber.

Q2: Is there anything missing from the learning outcomes in Part 1?

No.

Q2a: In which of the following areas do you think there is something missing? (Please tick all that apply)

- Person-centred care
- Professionalism
- Professional knowledge and skills
- Collaboration
- Other

Q2b: Please give a brief description of the gap or gaps you have identified.

N/A

Section 1: Learning outcomes (continued)

Q3: Is there anything in the learning outcomes in Part 1 that should be changed?

Yes.

Q3a: Please give details of the learning outcomes you would change and why (if possible, please give the reference number of the learning outcomes)

Domain 4, Outcome 2 – we believe that this should be assessed as “Knows how” instead of “Does”, as a trainee may not come across unsafe or inappropriate prescribing during the course of their training. This same principle seems to have been recognised for Domain 4, Outcome 3 (Safeguarding), so it would be reasonable to apply the same logic to prevent a trainee from being disadvantaged and ensure continuity of experience and outcomes.

Q4: Please give any other feedback explaining your responses to the questions on the learning outcomes (Important: Please give both positive and negative feedback where applicable)

The outcomes are in line with the skills and behaviours we would expect from a practicing PIP, and the clear links to the standards for registered Pharmacists will be helpful in reflective learning.

Section 2: Standards for course providers

Q5: Considering the full set of standards and criteria in Part 2, to what extent do you agree that these are appropriate standards for a pharmacist independent prescribing course?

We would agree that these standards would ensure a robust and supportive learning experience for trainees, with patient safety always at the core of delivery. We recognise and are welcoming of the approach taken to allow demand and real-world practice to shape the standards.

Q6: Is there anything missing from the standards or criteria in Part 2?

No.

Q6a: In which of the following areas do you think there is something missing? (Please tick all that apply)

- Domain 1 – Selection and entry requirements.
- Domain 2 – Equality, diversity and inclusion.
- Domain 3 – Management, resources and capacity.
- Domain 4 – Monitoring, review and evaluation.
- Domain 5 – Course design and delivery.
- Domain 6 – Learning in practice.
- Domain 7 – Assessment.
- Domain 8 – Support and the learning experience.
- Domain 9 – Designated prescribing practitioners.
- Other

Section 2: Standards for course providers (continued)

Q6b: Please give a brief description of the gap or gaps you have identified.

N/A

Q7: Is there anything in the standards or criteria in Part 2 that should be changed?

No.

Q7a: Please give details of the standards or criteria you would change and why (if possible, please give the standard or criteria reference numbers)

N/A

Q8: Please give any other feedback explaining your responses to the questions on the standards and criteria (Important: Please give both positive and negative feedback where applicable)

N/A

Section 3: Supervising pharmacist independent prescribers in training

Q9a: Will Domain 9 ensure that only appropriately trained and experienced independent prescribers will be acting as designated supervisors for the learning in practice part of pharmacist independent prescribing programmes?

Yes.

Q9b: Please explain your response

The selection criteria are robust, and the supportive measures described give confidence that any issues following selection would be identified and dealt with rapidly. We have a slight concern that finding a mentor for each DPP's first appointment may prove difficult and could act as a bottleneck to course throughput. Given that capacity is an issue that the introduction of the DPP is designed to address, it may be prudent to allow course providers a degree of flexibility in how they provide this initial support to those new to the role.

Section 4: Entry conditions for training

Q10a: Should the current two-year time requirement for training be removed and replaced with a requirement for the suitability and relevance of an applicant's experience to be submitted and approved as part of the application process?

Yes.

Q10b: Please explain your response

As described in the consultation document, duration of experience does not guarantee suitability for training. We believe that those who are deemed to have sufficient experience and motivation to embark on training will mostly be those who are well established in practice, but there should be no barrier to Pharmacists earlier in their career if they can demonstrate the required qualities.

This move will also help future-proof the courses should the policy direction lead to changes such that MPharm or pre-registration students are primed as “prescribing-ready” on graduation or registration respectively.

Section 5: Impact of the standards

Q11: Do you think anything in the standards or proposed changes would impact – positively or negatively – on certain individuals or groups who share any of the protected characteristics listed above?

No.

Q11a Please describe the impact and the individuals or groups concerned

N/A

Q12: Do you think anything in the standards or proposed changes would impact – positively or negatively – on any other individuals or groups?

No.

Q12a: Please describe the impact and the other individuals or groups concerned

N/A

Section 6: Other comments

Q13: Are there any other comments you would like to make about these standards or the changes we are proposing?

No.