



## Consultation on Revalidation for Pharmacy Professionals – APTUK Response

APTUK held a number of meetings regarding the revalidation consultation and the organisation response contains the feedback from approximately 50 individuals both Pharmacists and Pharmacy Technicians

**This response has been compiled primarily using the actual written responses provided by the contributors with the aim to ensuring the content accurately reflects the actual opinions and contributions of the APTUK members who engaged with this response.**

### The revalidation framework: process

The revalidation framework sets out the GPhCs proposals for carrying out, recording and submitting continuing professional development entries. It covers the following areas:

- your records – recorded CPD, a peer discussion and a written reflective account
- submitting records to the GPhC and what happens when they are not, or cannot be, submitted
- selecting records for review
- reviewing records and feedback
- how the GPhC follow up if the review criteria are not met 1.

1. Do you have any comments on any of the steps in the process covered in the framework?

### APTUK felt generally **supportive and positive** about the proposed changes in relation to the following:

- An improvement on the old process. The steps are clear and easy to follow and make the whole process a bit less daunting. The process is more focussed on CPD which is relevant to role and not just tick box. It will enable pharmacy professionals to focus on the quality of their CPD entries rather than the quantity needed. 4 entries per year are more manageable, pharmacy professionals have more time to reflect and learn more
- The steps in the framework are appropriate and measurable; and they ensure that the individual's proof of competency practice is current. Pharmacy professionals will begin to build this into a routine as they know that this is due yearly at the same time as registering. This will encourage recording regularly and not just wait when called to complete entries
- Peer discussion will give people opportunity to identify areas for development they will not notice independently. The peer discussion also ensures validity and appropriate feedback is provided. The reflective account record, being matched to the standards, enhances the understanding and knowledge of the standards as well as ensuring practice is aligned these.
- The new system will provide reassurance that professionals are up to date continually and checked annually rather than every 5 years increasing the profile and confidence in pharmacy profession
- Improved feedback on entries will support professional development

### APTUK felt that the following **improvements** could be made:

- Comment on flowchart 1 – box if you are not selected for review is not clear that feedback will be to the profession and not to you specifically
- Some additional guidance needed on reasons for extensions (related to equal opportunities) and clarify on how flexible this will be. Clear guidance needed for the process for asking for extensions and what evidence is needed
- Confirmation needed regarding the processes in place for registrants with learning needs e.g. dyslexia in



# Association of Pharmacy Technicians UK (APTUK)

## The Professional Leadership Body for Pharmacy Technicians

respect of writing comprehensive precise record for CPD/peer discussion and reflective accounts

- A clear appeal process is needed if feedback suggests that criteria hasn't been met or deemed to require remedial action by the reviewers

### APTUK identified the following challenges:

- Peer discussion could be challenging. Identifying peers and undertaking this within timelines for submission. Issues with registrants nearing retirement who may be less familiar with the concept or less inclined to engage.
- Peer discussion requires clear messaging for reasons why and how (its importance). Peer discussion will need support in some workplaces e.g. where identifying and accessing a peer are more difficult
- Clear messaging on professionalism needs champions to promote benefits and help with understanding the process

The framework aims to provide further assurance to the public that pharmacy professionals keep their knowledge and skills up to date and remain fit to practise throughout their careers. The changes the GPhC are proposing are:

- a simplified approach to CPD recording
- introducing a peer discussion
- introducing a reflective account based on the standards for pharmacy professionals

2. Do you think the changes above will help to support registrants in their practice and provide assurance that pharmacy professionals remain fit to practise?

Yes \_\_\_\_\_ ✓ \_\_\_\_\_ No \_\_\_\_\_

3. Do you have any comments about the changes proposed?

### APTUK felt overall 'Yes' and had the following comments:

- The public don't know what the level of practice is to start with to judge if it has improved or not. This is particularly relevant in hospital when they may only meet the patient once
- We strongly support annual submission of CPD as this supports compliance
- Peer discussion is beneficial as used two way and having good criteria to support this is useful, we felt that it was important to ensure that the peer discussion is about learning not performance review by employer
- Some pharmacy technicians might find it challenging to write a reflective account especially as more experienced pharmacy technicians may not have done this in the past
- We strongly support the benefit of consolidation of professional standards with the process
- Some clarification required on who checks the submission to GPhc. In our opinion this needs to be a pharmacy professional and not a lay person who checks the process, but someone with an understanding of the content, its accuracy and relevance to the individuals practice



4. Do you think the revalidation framework overall will achieve its aim of providing further assurance to users of pharmacy services?

Yes \_\_\_\_\_ ✓ \_\_\_\_\_ No \_\_\_\_\_

5. Is there anything else, not covered in the framework, that you would find useful? Please give details.

**APTUK agreed overall 'Yes' and identified that the following would be useful:**

- Different levels of support for pharmacy professionals working in different sectors such as guidance for arranging and content of a peer discussion and developing a reflective account. Videos, examples, templates of a CPD account and reflective statement would be helpful
- The option of collating evidence for CPD through an App. Creating a one stop shop for guidance on standards and submitting CPD
- The need to support pharmacy technicians who feel they are not being supported in their role
- Suggestion of a plan to promote the changes to users of pharmacy services, public engagement etc.

**APTUK had the following comments/questions:**

- The likelihood is that the patients/public will be aware of the changes or understand the benefits. However, we strongly feel that there is a hidden positive impact for patients by providing better services, more patient focussed, better patient counselling etc.
- Would there be scope for users of pharmacy teams to give feedback via the GPhC on individuals or teams?
- Could patient forums/surveys be introduced and form part of reflective practice and the need for a greater focus on patient feedback?

**The revalidation framework: impact**

6. What kind of impact do you think the proposals will have on people using pharmacy services?

- No impact
- Mostly positive
- Partly positive
- Positive and negative
- Partly negative
- \_\_\_\_\_



Mostly negative

7. What kind of impact do you think the proposals will have on pharmacy professionals?

No impact

Mostly positive

Partly positive

Positive and negative

Partly negative

Mostly negative

8. What kind of impact do you think the proposals will have on pharmacy employers?

No impact

Mostly positive

Partly positive

Positive and negative

Partly negative

Mostly negative

9. Please give any further comments you have on the possible impact of the proposals on any of the above groups:

**APTUK felt that the impact on people using pharmacy services was partly positive and has the following positive comments:**

- Increasing patient safety as professionals more focussed
- Greater focus on GPhC standards ensuring patient focus at all levels
- Clear reassurance that professionals are up to date
- Improved compliance and commitment with process
- Better development feedback for pharmacy professionals
- 

**APTUK felt that the impact on pharmacy professionals was mostly positive and has the following positive comments:**



# Association of Pharmacy Technicians UK (APTUK)

## The Professional Leadership Body for Pharmacy Technicians

- Increase self confidence so they feel able to improve patient care
- Reflection will help identify areas that need work/ can progress
- The new process encourages recording of CPD regularly rather than when just called, more frequent recording of CPD will lead to an opportunity to discuss CPD with peers and feedback will be more frequent

### The following **concerns/challenges** were identified

- Some anxiety and fear factor if asked to do a peer review and reflective writing, particularly in those less used to the concept
- The new process will require support initially, similar to when CPD was introduced, particularly those towards the end of their career
- Potentially there will be more impact on operational staff rather than those whose role is office bound

### APTUK felt that the impact on pharmacy employers was **partly positive** and has the following **positive** comments:

- Employers will be able to clearly identify that regular CPD recording and revalidation is taking place
- Employers could use this process to link to quality monitoring and systems that address risk

### The following **concerns/challenges** were identified

- The process could highlight performance issues causing HR problems
- Staff could demand greater training and development and the process requires support, understanding and commitment from pharmacy employers. Employers need to provide time or understanding that time will be needed, particularly with peer discussion
- There are potential time implications for facilitation of peer review process as this will take 2 members of staff
- If registrants defer CPD and fail then they may be struck off or not be able to re-register. If this happens the employer may be affected if this individual can't work

### Equality Analysis

The GPhC believe revalidation for pharmacy professionals should have positive implications for people. They have not identified any implications that would discriminate against or unintentionally disadvantage any individuals or groups who share the particular protected characteristics set out in the Equality Act 2010.

10. Do you think the proposal might have an impact on certain individuals or groups who share any of the protected characteristics?

Yes  No

11. If 'Yes', please explain and give examples.

APTUK felt overall **'Yes'** and had the following comments/examples:

Were **'No'** was indicated APTUK felt that this was generally in relation to registrants with **learning disabilities/special requirements**



- Methods to record CPD need to consider individuals learning styles and preferences E.g. someone with dyslexia might find writing challenging
- A suggestion to provide different options such as recorded for providing evidence e.g. verbal recordings, discussion, reflective account. Consideration of different methods to support individuals with disability may be required
- Registrants with ESOL – will grammar and structure be assessed? If so, how will this be made fair for the individual?

### **Summary and National Officers Comments**

This response has been compiled primarily using the actual written responses provided by the contributors with the aim to ensuring the content accurately reflects the actual opinions and contributions of the APTUK members who engaged with this response.

At the various engagement events and anecdotally it is clear that APTUK members are generally very positive about the proposed changes to CPD. They feel that the framework provides a better mechanism to demonstrate that they are meeting standards and that the framework in practice will work.

There is clearly some anxiety in our members which has been expressed in this response around the new elements of peer discussion and reflective account. As the professional leadership body for pharmacy technicians we have a role in providing guidance and support in this. In order to provide this support it would be vital for the APTUK to work with the GPhC to help reach and support pharmacy technicians

Response prepared by:  
Mary Carter  
National Officer for Revalidation  
APTUK  
July 2017