



Association of Pharmacy Technicians UK (APTUK)

The Professional Leadership Body for Pharmacy Technicians

APTUK response to the GPhC Consultation on guidance to ensure a safe and effective pharmacy team: July 2017: Deadline: 11th October 2017.

APTUK held a several meetings regarding the guidance to ensure a safe and effective pharmacy team consultation and the organisation response contains the feedback from the APTUK Professional Committee.

Effective team working is an essential part of providing good-quality care. The introduction to the GPhC standards for registered pharmacies explains the purpose of the standards: 'to create and maintain the right environment, both organisational and physical, for the safe and effective practice of pharmacy'.

This consultation is about guidance to support those standards and in particular our desire to strengthen and assure the regulatory framework around unregistered pharmacy staff.

The draft guidance covers all pharmacy staff, including non-registrant managers. The new guidance, supporting the standards for registered pharmacies, is intended to replace the existing policy on minimum training requirements for dispensing/pharmacy assistants and medicines counter assistants.

This consultation document has two sections:

Part 1: The framework

This explains what is changing and why. It sets out what we do now, what we propose to do differently, and what we have taken into account when considering the changes.

Part 2: The guidance

This summarises the key elements of the guidance for pharmacy owners to ensure a safe and effective pharmacy team.

Consultation questions and APTUKs response

Background questions

Section B – Responding on behalf of an organisation

Please provide a brief description of what your organisation does and its interest in this particular consultation:

APTUK is the professional leadership body for pharmacy technicians. Although we represent pharmacy technicians, we are interested in this consultation as unregistered staff are often supervised and performance managed by pharmacy technicians. PTs are more than likely the staff group who undertake the induction, train unregistered staff and are more often their assessor's ensuring competence against the NVQL2 qualification. Pharmacy Technicians act as workplace assessors and provide internal quality assurance of the process, with responsibility of signing off evidence portfolios. PTs work closely with unregistered staff and are often responsible for their recruitment and ongoing development, particularly in the secondary care sector.



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APTUK is also interested in this consultation and wants to highlight support for referring to registered and unregistered staff throughout the guidance narrative. We are supportive of this as there is often a blurring of the roles, particularly in community pharmacy, between a pharmacy technician and a dispensing assistant. It is often difficult to differentiate between the roles and responsibilities of these staffs and using the unregistered terminology within this guidance is helpful. It is also helpful that the difference between registered and unregistered staff is clearly stated.

Consultation questions

The new framework

At the moment, through the existing minimum training requirements, individual pharmacists are accountable to the GPhC for the training of staff, which should be the responsibility of the owner. The new framework will make it clear that the pharmacy owner is accountable for making sure unregistered pharmacy staffs are competent for their roles.

1. Do you agree with the proposed approach?

Yes

No

Please explain your reasons for this.

APTUK agrees in principle that the pharmacy owner/employer should be accountable for ensuring that all staff, and in particularly in this context unregistered staff, are competent to carry out their roles. However, APTUK would like to highlight that this approach is highly dependent on the quality, standardisation and assurance of the premises inspections under the Standards for pharmacy premises. Also that the owners/employers will need to be clear and knowledgeable about the training/assessment that is available to ensure it meets the job role requirements.

Draft guidance

We have developed guidance which sets out the key areas that are needed to ensure a safe and effective pharmacy team, with a specific focus on unregistered pharmacy staff. It covers:

- governance
- education and training requirements
- knowledge, skills and development
- maintaining a person-centred environment
- management and leadership roles



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2. Does the proposed guidance adequately cover the key areas to ensure a safe and effective team?

Yes

No

3. Is there anything else not covered in the guidance that you would find useful? Please give details.

Although APTUK have agreed in main to the areas covered, there does need to be more emphasis on specific aspects: governance should also include performance management/appraisal.

Education & training requirements- being linked NVQL2: although dispensing/medicines supply are sufficiently covered by this, as it currently stands the knowledge of medicines in OTC sales unit is not sufficiently covered and thus presents a risk to patient safety. Although the guidance indicates that professionalism /communication/ working in a team is included, health & safety appears to be omitted.

This would include SOPs & risk assessments and is essential. As the guidance covers dispensing, would this also include Section 10 dispensing? This needs further clarity and whether other technical services activities are included. In addition, APTUK are aware that pharmacy assistants are undertaking routine medicines management activities such as checking patients own drugs for reuse and ordering medicines. This isn't currently included in the NVQL2.

Training requirements

We want to make sure that appropriate training is provided for all staff so that patients receive quality care. Our aim is for a framework which provides assurance that this training takes place to an appropriate level, but it is also flexible so that employers can tailor training to the needs of the team and the services they provide.

The draft guidance makes it clear that unregistered pharmacy staff who are involved in dispensing and supplying medicines must have the knowledge and skills of the relevant units of a nationally recognised Level 2 qualification, or are training towards this.

4. Do you agree with the minimum level of competence for unregistered pharmacy staff who are involved in dispensing and supplying medicines?

Yes

No

Please explain your reasons for this. The guidance makes it clear that all unregistered pharmacy staff who need further education and training to meet the required competency level for their role should be enrolled on an appropriate training programme within three months of starting in their role.



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APTUK agree with the minimum level as the job role currently stands. However as the guidance indicates that its strength is within its flexibility, it would therefore need to be monitored as the pharmacy team roles evolve and routine tasks are delegated.

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APTUK read from the guidance that only a 'nationally' recognised qualification is set as the standard. Would this mean that the current equivalents would no longer be available? Although we support this move as it brings a more standardised approach and ensures that all learners have the same qualification, it would mean that the necessary NVQ (as it stands currently) infrastructure would need to be in place. APTUK question whether this is achievable. Using a national qualification does bring quality assurance /approval processes to the development, structure and assessment. However, as the GPhC will no longer accredit or approve, APTUK believe that this function, still needing to be in place, would be best undertaken by the Professional Leadership Bodies: APTUK/RPS. As both bodies have recently released a statement of intent for closer working this would clearly fit this intent.

The guidance makes it clear that all unregistered pharmacy staff who need further education and training to meet the required competency level for their role should be enrolled on an appropriate training programme within three months of starting in their role.

5. Do you agree with our proposed approach?

Yes

No

Please explain your reasons for this.

APTUK agree with this approach as this allows an induction and training period before enrolling learners onto a qualification. 3 months is a reasonable time period as this allows sufficient time to learn the basics of the job. Providing guidance gives a standardised approach across all the pharmacy sectors. In terms of the training, it would be useful to define the process of dispensing and where this starts, i.e. on receipt of the prescription rather than assembly of the medicines.

Impact

We want to know how the proposed changes to the framework for the education and training of unregistered pharmacy staff may affect pharmacy owners, pharmacy professionals, unregistered pharmacy staff, and people using pharmacy services.

6. What impact do you think the proposals will have on pharmacy owners?



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No impact

Mostly positive

Partly positive

Positive and negative

Partly negative

Mostly negative

7. What 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 impact do you think the proposals will have on unregistered pharmacy staff?

No impact

Mostly positive

Partly positive

Positive and negative

Partly negative

Mostly negative

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

No impact

Mostly positive

Partly positive

Positive and negative



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Partly negative

Mostly negative

10. Do you have any other comments?

The impact on pharmacy owners would include needing to ensure that competences are being met in full. For the current NVQ process this means ensuring that there is an infrastructure in place and that this is fully costed for time/delivery/resources to meet quality assurance requirements.

For pharmacy professionals, an impact might be that they are more involved in training and assessment.

For unregistered staff, study time is needed. However for pharmacy users, the impact is positive, as a minimum standardised training/assessment would be in place.

If the outcome of the consultation supports the continuation of either NVQ and/or NVQ equivalent courses, these would need to be accreditation or approval process to ensure consistency of training across pharmacy. If the GPhC is no longer undertaking this function, it should sit with the professional leadership bodies- jointly- APTUK/RPS.

Currently unregistered staff undertakes final accuracy checking and there are L2 equivalent courses to support this. There is no reference to this in the guidance and APTUK believe that this activity undertaken by unregistered staff is in conflict with the 'new' Pharmacy Technician Initial Education and Training Standards.

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

Yes

No

If 'Yes', please explain and give examples

The guidance is not clear on modes of delivery for the training/assessment and adjustments that might be needed for particular individual learners.

The guidance could be clearer about maintaining standards and competence, or how that relates to ongoing premises inspection. How will this be measured?

The guidance leaves 'protected' study time to the owner's discretion. This could lead to variability across employers which would be unfair to the learners.

The guidance does not give any information on the professional or academic requirements for staff being recruited into these job roles, i.e. entry criteria. Should character checks be undertaken as a minimum for



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patient safety and public reassurance as these staffs are directly patient facing? i.e. DBS checks across the sectors, as these are already in place in secondary care.

APTUK see the inclusion of non-pharmacy managers as a positive step forwards. However, the guidance is silent or unclear on training/competency requirements for delivery drivers.

More information

We would like to email respondents to update them on progress on this consultation as well as other work of the GPhC. Please tell us below if you would like to be contacted in the future.

I would like to be contacted with updates related to the consultation on guidance to ensure a safe and effective pharmacy team.

I would like to be contacted with news and information about other consultations from the GPhC.

Please tell us your:

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