

Consultation on initial education and training for pharmacy technicians

10%

How we will use your response

Following the consultation, we will publish a report summarising what we heard. We may quote parts of your response in that report or in other documents but if you respond as a private individual, we will not use your name unless you give consent for us to do so. We will also publish a list of organisations that respond to this consultation.

If you want your response to remain confidential, you should explain why you believe the information you have given is confidential. However, we cannot guarantee that confidentiality can be maintained in all circumstances.

You may use my name in the report.

- Yes
- No

I give the GPhC permission to quote from my response in the consultation report.

- Yes
- No

We may have to publish all information in responses under access to information legislation (usually the Freedom of Information Act 2000 and the Environmental Information Regulations 2004).

Any diversity monitoring information you give us will be used to review the effectiveness of our consultation process. It will not be part of a published response:

Please tell us if you have any concerns about our publishing any part of your response.

Consultation on initial education and training for pharmacy technicians

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Background questions

First, we would like to ask you for some background information. This will help us to understand the views of specific groups, individuals and organisations and will allow us to better respond to those views.

Are you responding: *

- as an individual
- on behalf of an organisation

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Section B: Responding on behalf of an organisation

Please tell us your:

| | |
|-------------------------------|------------------------------------------------------------------------|
| name: | <input type="text" value="Dalqeet Puaar"/> |
| job title: | <input type="text" value="Professional Practice Development Officer"/> |
| organisation: | <input type="text" value="APTUK"/> |
| address: | <input type="text" value="One Victoria Square, Birmingham, B1 1BD"/> |
| email: | <input type="text" value="professional.practice@aptuk.org"/> |
| a contact name for enquiries: | <input type="text" value="Dalqeet Puaar"/> |
| contact phone number: | <input type="text" value="0121 632 2025"/> |

Is your organisation a:

- pharmacy organisation
- non-pharmacy organisation

Please choose the option below which best describes your organisation:

- body or organisation representing professionals
- body or organisation representing patients or the public
- body or organisation representing a trade or industry
- community pharmacy
- corporate multiple pharmacy
- independent pharmacy
- NHS organisation or group
- pharmacy technician education and training provider
- other research, education or training organisation
- government department or organisation
- regulatory body
- other (please give details)

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Consultation questions

We are particularly interested in your views on the following points, although we welcome your comments on any issues that you want to raise about the IET standards for pharmacy technicians.

Part 1: IET standards for pharmacy technicians – learning outcomes and part 2: Standards for IET course providers

The standards focus on high-quality care, of which safety is a key part. Safety is at the heart of the education and training of all pharmacy professionals, and is embedded in these standards.

The standards also reflect how some elements of the pharmacy technician role, which were once seen as advanced practice, are now basic to that role. This includes:

- the ability to carry out accuracy checking

- the requirement for newly qualified pharmacy technicians (like pharmacists) to be able to understand core safety concepts such as clinical and corporate governance, as well as audit, and
- their ability to work both within and across teams

The draft standards should also reflect improved links between providers and employers.

1. IET standards for pharmacy technicians – learning outcomes: Are these the right outcomes, at the right level?

1. Person-centred care Learning outcomes

1. Involve, support and enable every person when making decisions about their health, care and wellbeing - **Does**

Agreed

2. Optimise a person's medication to achieve the best possible outcomes - **Knows how**

APTUK feel this learning outcome should be 'Shows how'. This would be in line with the medicines Management role that should be included, this can be demonstrated in all sectors.

3. Listen to the person, and understand their needs and what matters to them - **Does**

Agreed

4. Give the person all relevant information in a way they can understand, so they can make informed decisions and choices - **Does**

Agreed

5. Obtain relevant information from people – including patients and other healthcare professionals – and use it appropriately - **Does**

Agreed

6. Recognise and value diversity, understand cultural differences and make sure that every person – patients, colleagues and others – is treated fairly whatever their values and beliefs - **Does**

Agreed

7. Adapt information and communication to meet the needs of particular audiences - **Does**

Agreed

8. Apply the principles of information governance and ensure patient confidentiality - **Does**

Agreed

9. Effectively promote healthy lifestyles using available resources and evidence-based techniques - **Knows how**

APTUK feel this learning outcome should be 'Does'.

All pharmacy technicians should be able to interact with patients regarding their lifestyle and promote healthy living.

10. Be able to provide public health advice and recommend recognised health screening or public health initiatives - *APTUK feel this learning outcome should be 'Does'.*

11. Take action to safeguard people, particularly children and vulnerable adults - **Knows how**

Agreed

2. Professionalism Learning outcomes

12. Apply professional judgement in the best interests of people - **Does**

Agreed

13. Recognise and work within the limits of their knowledge and skills, and refer to others when needed - **Does**

Agreed

14. Respond effectively to complaints, incidents and errors and in a way that demonstrates person-centred care - **Does**

Agreed

This is definitely a 'Does' as pharmacy technicians would be expected to deal with this scenario rather than just refer it.

15. Use information to make effective decisions - **Does**

Agreed

This is essential as professional judgement and effective decisions making is needed.

16. Take personal responsibility for the health and safety of themselves and others, and follow up any concerns about the workplace which might put them at risk - **Does**

Agreed

17. Recognise when their performance or the performance of others is putting people at risk and respond appropriately - **Does**

Agreed

18. Raise concerns even when it is not easy to do so - **Does**

Agreed

19. Act openly and honestly when things go wrong - **Does**

Agreed

20. Use a variety of methods to regularly monitor and reflect on practice, skills and knowledge - **Does**

Agreed

21. Effectively use feedback to develop professional practice - **Does**

Agreed

22. Carry out a range of relevant continuing professional development (CPD) activities - **Does**

Agreed

23. Reflect and act on feedback or concerns, thinking about what can be done to prevent something happening again - **Does**

Agreed

APTUK feel there should be a learning outcome about individuals being responsible for their own learning.

3. Professional knowledge and skills Learning outcomes

24. Provide a safe, effective and responsive pharmacy service - **Does**

Agreed

However, it was felt that this statement was very broad and maybe should include 'within own area/scope of practice'

25. Take personal responsibility for the legal, safe and efficient supply of medicines - **Does**

Agreed

26. Apply basic pharmacological principles to the use of medicines - **Know how**

APTUK feel this learning outcome should be 'applies'.

It is felt that this learning outcome needs to be clarified and expanded. An indicative syllabus will allow for the detail of which pharmacological principles.

27. Confirm the suitability of a person's medicines for use and ensure sufficient supply - **Does**

Agreed

However, APTUK think this should be two learning outcomes to make it clear.

28. Accurately retrieve and reconcile information about a person's medicines - **Does**

Agreed

However, APTUK think this should be two learning outcomes to make it clear.

29. Assess a person's present supply of medication and order appropriate medicines and products - **Knows how**

APTUK feel this learning outcome should be 'Does'.

This would be in line with the other medicines optimisation learning outcomes. This learning outcomes could also be linked to supply, summary care records & EPS.

30. Accurately review a person's medication to identify the medicines they need - **Knows how**

APTUK feel this learning outcome should be 'Does'.

31. Order, receive, maintain and supply medicines and other pharmaceutical products safely, legally and effectively - **Knows how**

Agreed

32. Receive prescriptions and check for their validity, safety and clarity, taking action to deal with any problems -

Does

Agreed

33. Effectively use systems to support the safe supply of medicines - **Does**

Agreed

34. Accurately assemble prescribed items - **Does**

Agreed

35. Apply pharmaceutical principles to the safe and effective formulation, preparation and packaging of medicines and products - **Knows how**

Agreed

APTUK recognises that this is like the current route as knowledge is a mandatory component of the knowledge programme and skills is optional in the NVQ. However, APTUK feels there needs to be a framework that allows progression into this specialist role. It is essential that we continue to use pharmacy technicians in this area and support their development.

36. Issue prescribed items safely and effectively and take action to deal with discrepancies - **Does**

Agreed

APTUK feel that consultation with the patient is missing, this may need to be in a separate learning outcome.

37. Carry out an accuracy check of dispensed medicines and products - **Does**

Agreed

APTUK feels that this needs clarifying, it is not clear that this is the final accuracy check. It is essential that there is sufficient underpinning knowledge to support this.

38. Accurately perform pharmaceutical calculations to ensure the safety of people - **Does**

Agreed

39. Ensure the quality of ingredients to produce and supply safe and effective medicines and products - **Knows how**

Agreed

40. Recognise adverse drug reactions and interactions and respond appropriately - **Knows how**

APTUK feel this learning outcome should be 'Shows how'.

41. Safely and legally dispose of medicines and other pharmaceutical products - **Knows how**

APTUK feel this learning outcome should be 'Shows how'.

42. Respond appropriately to medical emergencies, including providing first aid - **Knows how**

Agreed

43. Understand the importance of recording and learning from errors and near misses - **Knows how**

APTUK feel this learning outcome should be 'Does'.

44. Understand the concepts of clinical governance and working effectively as part of multi-disciplinary teams -

Knows how

Agreed

45. Take part in audit and quality-improvement strategies and implement recommendations effectively - **Knows how**

APTUK feel this learning outcome should be 'Does' as it says take part.

APTUK feel that the following are missing from the knowledge and skills learning outcomes:

- *Patient consultations.*
- *Pharmacy Informatics – Pharmacy Technicians will be more involved in data/information/technology such as automated ordering/robotics/ medicines safety audits.*
- *Patients disease and illness – understanding illness behaviours and emotions so that Pharmacy Technicians can support patients with long term conditions.*
- *Medicines administration – More Pharmacy Technicians are getting involved in medicines administration.*
- *Patient Group Directives – Understanding what they are, protocols and responsibilities (This might be included in Law and be too much detail).*
- *Diagnostic tests - Reading results such as INR, Clozapine etc, this is linked to the Medicines Management standards and reading SCRs.*

4. Collaboration Learning outcomes

46. Demonstrate effective team working - **Does**

Agreed

47. Communicate and work effectively with members of the multidisciplinary team - **Does**

Agreed

48. Check their own and others' work effectively - **Does**

Agreed

However, APTUK feels this needs further clarification. It is not clear what the outcome is.

49. Take part in the learning and development of others - **Does**

Agreed

50. Prioritise time and resources effectively to achieve objectives – **Does**

Agreed

2. Standards for IET course providers: Are these the right standards and criteria?

Domain 1 – Selection and entry requirements

Standard 1.1: Selection processes must be open, clear, unbiased and keep to relevant legislation.

Standard 1.2: Processes must be designed to identify applicants with the right attributes for training as a healthcare professional.

Standard 1.3: Entry requirements must ensure that applicants are fit to practise as trainees at the point of selection.

Agreed

Criteria to meet these standards

1.1 Selection criteria must be clear and unambiguous.

They must include as a minimum:

- meeting specified English language requirements
- meeting specified numeracy requirements
- taking account of good character checks
- taking account of health checks

APTUK feel that science should be included.

While APTUK agree with the ‘taking account of good character checks’ it is essential that the GPhC gives clear guidance on what the checks should include and support if they are not met. It is essential that resources are not lost training individuals that will not be able to register.

1.2 Applicants must be working in a pharmacy environment and be supervised by a pharmacist or pharmacy technician.

APTUK would suggest that training environments are registered with the GPhC and quality assured.

1.3 Selectors must apply the selection criteria consistently, in an unbiased way and in line with relevant legislation. They should be trained to do this and training should include equality, diversity and inclusion.

Agreed

1.4 Applicants must be given the guidance they need to make an informed application.

Agreed

Domain 2 – Equality and diversity

Standard 2: All aspects of pharmacy technician education and training must be based on principles of equality and diversity and keep to all relevant legislation.

Agreed

Criteria to meet this standard

2.1 Equality and diversity must be embedded in course design and delivery.

Agreed

2.2 Equality and diversity data must be used in designing and delivering courses, and in planning the whole experience of being a pre-registration trainee pharmacy technician.

APTUK feel this need further clarification. OfSted requirements could be used.

2.3 Reasonable adjustments must be made to course delivery and assessment to help preregistration trainee pharmacy technicians having specific needs to meet the learning outcomes. Teaching, learning and assessment may be modified for this purpose but learning outcomes may not.

Agreed

Domain 3 – Management, resources and capacity

Standard 3: Courses must be planned and maintained using transparent processes which must show who is accountable for what at each stage of initial education and training. The education and training facilities, infrastructure, leadership, staffing and staff support must be adequate to deliver the course.

Agreed

However, what will be deemed adequate? Maybe this needs clarification or re-wording.

Criteria to meet this standard

3.1 All courses must be backed up by a defined management plan which must include:

- a schedule of roles and responsibilities, in the learning and training environments and in the workplace
- lines of accountability, in the learning and training environments and in the workplace
- defined structures and processes to manage delivery
- processes for identifying and managing risk

Agreed

3.2 There must be agreements in place outlining the roles and responsibilities of all those involved in delivering a course.

Agreed

3.3 Each pre-registration trainee pharmacy technician must have a learning agreement covering all the learning and training environments. This must outline roles, responsibilities and lines of accountability, and must say how trainees will be supported during the course. Course providers must explain how they will be reassured that learning agreements will be implemented in full.

Agreed

This will support poor practice.

3.4 All course providers must have pharmacy professionals involved in the design and the delivery of the course.

Agreed

3.5 In all the learning and training environments, there must be:

- appropriately qualified and experienced staff
- enough staff from relevant disciplines to deliver the course and support pre-registration trainee pharmacy technicians' learning
- enough resources to deliver the course
- facilities that are fit for purpose
- access to appropriate learning resources

Agreed

APTUK feel the word facilities could be clarified with more detail.

3.6 Everyone involved in managing and delivering the course must understand their role and must be given support to carry out their work effectively.

Agreed

APTUK feel the word resources should be included.

3.7 Each pre-registration trainee pharmacy technician must be supported as a learner in the workplace. There must be systems in place for liaising with course providers regularly about the progress of a pre-registration trainee pharmacy technician.

Agreed

Domain 4 – Monitoring, review and evaluation

Standard 4: The quality of courses must be monitored, reviewed and evaluated in a systematic and developmental way.

Agreed

However, should include ongoing external monitoring.

Criteria to meet this standard

4.1 All relevant aspects of courses must be monitored, reviewed and evaluated systematically. When issues are identified they must be documented and dealt with within agreed timescales.

Agreed

4.2 There must be a quality-management structure in place that sets out procedures for monitoring and evaluation. This must include who is responsible, and the timings for reporting, review and taking action when appropriate.

Agreed

4.3 There must be systems in place to monitor and evaluate the standard of teaching, learning and assessment to make sure that quality is maintained across all learning environments.

Agreed

4.4 Course monitoring and review must take into account the external environment, especially pharmacy, to make sure that courses stay up to date as they are delivered.

Agreed

APTUK would suggest that external environment is changed to external factors.

4.5 Feedback to pre-registration trainee pharmacy technicians must be a part of monitoring, review and evaluation processes.

Agreed

Domain 5 – Course design and delivery

Standard 5: Courses must develop the required skills, knowledge, understanding and professional behaviours to meet the outcomes in part 1 of these standards by using a coherent teaching and learning strategy. The design and delivery of training must take account of stakeholders' views and must ensure that trainees practise safely and effectively.

Agreed

APTUK feel that the workplace should be included.

Criteria to meet this standard

5.1 Courses must be designed and delivered using strategies which bring together knowledge, competence and work.

Agreed

The wording needs to be as in the standard – ‘skills, knowledge, understanding and professional behaviours’

5.2 The GPhC’s Standards for Pharmacy Professionals must be part of all courses and used actively. This is to make sure that pre-registration trainee pharmacy technicians know what will be expected of them when they are registered.

Agreed

APTUK would advise adding ‘during training’ to the end of the first sentence.

5.3 There must be a course teaching and learning strategy which sets out how trainees will achieve the outcomes in part 1 of these standards.

Agreed

5.4 Courses must be designed and delivered to develop the skills, knowledge, understanding and professional behaviours required to meet the learning outcomes in part 1 of these standards.

Agreed

5.5 Course providers must get the views of a range of stakeholders – including patients, the public and employers – and take account of them when designing and delivering the course.

Agreed

5.6 Courses must be revised when there are significant changes in practice, to make sure they are up to date.

Agreed

However, APTUK would suggest that this is re-worded to say must be reflect current practice and legislation.

5.7 Pre-registration trainee pharmacy technicians must be supervised using an agreed system in all learning and training environments, to ensure patient safety at all times.

Agreed

5.8 Pre-registration trainee pharmacy technicians must carry out only tasks in which they are competent, or are learning under supervision to be competent in, so that patient safety is not compromised.

Agreed

5.9 Course regulations must be appropriate for a course that leads to professional registration. That is, they must prioritise professionalism, patient safety, and safe and effective practice.

APTUK feel that it is essential that professionalism, patient safety, and safe and effective practice are embedded throughout the course and training.

5.10 All course providers and employers must have procedures to deal with concerns. Serious concerns that may affect a pre-registration trainee pharmacy technician's suitability for future registration must be reported to the

Agreed

However, it is essential that the GPhC provide clear guidance and support course providers and employers.

Domain 6 – Course assessment

Standard 6: Courses must have an assessment strategy which assesses required skills, knowledge, understanding and professional behaviours to meet the outcomes in part 1 of these standards. The assessment strategy must assess whether a pre-registration trainee pharmacy technician's practice is safe.

Agreed

However, needs to include workplace to make it completely clear.

Criteria to meet this standard

6.1 Courses must have an assessment strategy which ensures that assessment is robust, reliable and valid.

Agreed

APTUK suggests that 'fair' is added.

6.2 The assessment strategy must assess the learning outcomes in part 1 of these standards. Methods used must be appropriate for what is being assessed; and teaching, learning and assessment must be aligned.

Agreed

6.3 Assessment of competence must take place in the workplace.

Agreed

APTUK suggests that 'pharmacy' is added before workplace.

6.4 Patient safety must come first at all times, and the assessment strategy must assess whether a pre-registration trainee pharmacy technician is practising safely.

Agreed

APTUK suggests that 'safely and effectively' is added.

6.5 Monitoring systems must be in place in all learning and training environments. The systems must assess a pre-registration trainee pharmacy technician's progress towards meeting the learning outcomes in part 1 of these standards. They must ensure that a pre-registration trainee pharmacy technician's practice is safe at all times. Causes for concern must be dealt with as soon as possible.

Agreed

6.6 Agreements must be in place between course providers, the workplace and pre-registration trainee pharmacy technicians. These must describe roles and responsibilities in the assessment of pre-registration trainee pharmacy technicians.

Agreed

6.7 Assessments must be carried out by appropriately trained and qualified people who are competent to assess the performance of pre-registration trainee pharmacy technicians.

Agreed

6.8 There must be independent quality assurance of assessment processes.

Agreed

6.9 Pre-registration trainee pharmacy technicians must receive appropriate and timely feedback on their performance, to support their development as learners and professionals.

Agreed

6.10 Assessment regulations must be appropriate for a course that leads to professional registration. That is, they must prioritise professionalism, patient safety, and safe and effective practice.

Agreed

Domain 7 – Pre-registration trainee pharmacy technician support and the learning experience

Standard 7: Pre-registration trainee pharmacy technicians must be supported in all learning and training environments to develop as learners and professionals during their initial education and training.

Criteria to meet this standard

Agreed

7.1 There must be a range of systems in place to support trainees to achieve the learning outcomes in part 1 of these standards, including:

- induction
- effective supervision
- an appropriate and realistic workload
- personal and academic support
- time to learn
- access to resources

Agreed

APTUK would suggest that 'all learning environments' is added. Also that professional appraisal is included.

7.2 There must be systems in place for pre-registration trainee pharmacy technicians to meet regularly with workplace colleagues to discuss and document their progress as learners.

Agreed

However, APTUK would suggest that workplace colleagues is replaced with 'tutor' and professional appraisal is included.

7.3 Pre-registration trainee pharmacy technicians must have support available to them covering academic study, general welfare and career advice.

Agreed

However, APTUK think that the term general welfare needs expanding. It has been shown that learners that have a named tutor who is consistent throughout their learning can build a better rapport with the learner and provide more support, therefore APTUK would like to see a named tutor included.

7.4 Pre-registration trainee pharmacy technicians must have access to pharmacists and pharmacy technicians who are able to act as role models and give professional support and guidance.

Agreed

7.5 Pre-registration trainee pharmacy technicians must have the opportunity to work in multidisciplinary environments.

Agreed

7.6 There must be clear procedures for pre-registration trainee pharmacy technicians to raise concerns. Any concerns must be dealt with promptly, with documented action taken when appropriate. Pre-registration trainee pharmacy technicians must be made aware of the GPhC's guide to raising concerns about pharmacy education and training

Agreed

7.7 Everyone supporting pre-registration trainee pharmacy technicians must take into account the GPhC's guidance on tutoring for pharmacists and pharmacy technicians in their work.

Agreed

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70%

Part 3: Changes to the criteria for registration as a pharmacy technician

We also outlined changes in three particular areas:

a. Pre-registration trainee pharmacy technicians will be able to train under the direction, supervision or guidance of a pharmacy technician or pharmacist.

Under the present criteria, pre-registration trainee pharmacy technicians must train under the direction, supervision or guidance of a pharmacist only. Now that pharmacy technicians are an established registrant group, we think that pre-registration trainee pharmacy

technicians should be able to be supervised by the registrant group they intend to join. This also takes into account that pharmacy technicians may train legitimately in pharmacy environments where a pharmacist may not be present.

3. Do you have any comments about this proposed change and its potential impact?

Agreed

APTUK support this move fully. It shows that pharmacy technicians are professionals and their value. It is also in line with other professions.

4. Do you have any comments about whether we should keep the two-year work experience requirement or whether we should introduce a change, and about any potential impact?

APTUK have some concerns about this, there is a potential that learners will be pressurised by employers to fast track as a potential cost saving and meet workforce demands. It is essential that the time period does not compromise patient safety.

When considering if a minimum number of hours is sufficient APTUK has some concerns about employers putting pressure on learners to work unreasonable hours to meet the minimum number of hours in a short time period, again we must protect the PTPT and their learning journey.

It is essential that PTPTs are exposed to the breadth and depth of experience to support them as a professional once qualified.

APTUK also recognises that there are additions to the IET Standards and although some skills have been reduced they are still present in the knowledge, therefore it is highly unlikely that a PTPT would complete this programme in less than two years.

As a group of professionals, the reduced time period may cause patients concerns and lack of trust in the ability to pharmacy technicians. While we do not want PTPTs to be on a programme unnecessarily many professionals take more than two years to qualify. Therefore, we think the patients prospective must be explored.

APTUK recognises that some PTPTs complete the skills based qualification in less than but this is in the minority and this is on the current IET Standards.

APTUK also sees a discrepancy with the minimum number of hours verses the minimum time period. It is felt that the minimum number of hours should be increased.

5. Do you have any comments about this proposed change and its potential impact?

Agreed

The IET Standards are different.

Consultation on initial education and training for pharmacy technicians

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Feedback on workplace training and quality assurance for the IET of pharmacy technicians

At present, IET courses are quality-assured through accreditation by the GPhC. The accreditation process covers learning outcomes and requirements on course providers. We welcome any comments or feedback on the quality of workplace training, including support to pre-registration trainee pharmacy technicians and any areas which respondents believe need strengthening.

6. Do you have any comments about workplace training and the quality assurance of initial education and training?

Currently those qualifications deemed equivalent are matched against the IET standards and once approved do not undergo any further external quality assurance until the approval is due to be renewed.

APTUK strongly feel that the qualification for entry onto the register should be one 'national' qualification awarded by and awarding organisation which includes ongoing external quality assurance.

There should be no courses that are deemed equivalent as the one agreed 'national' qualification as these do not go through the same ongoing external quality assurance.

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Equality analysis

We haven't identified any areas where these standards or suggested changes to the criteria would discriminate against or unintentionally disadvantage any individuals or groups. However, we know from our own analysis that the pharmacy technician workforce is different to the pharmacist workforce. For example, the gender balance is different. We also realise that the way education and training is delivered may affect groups differently.

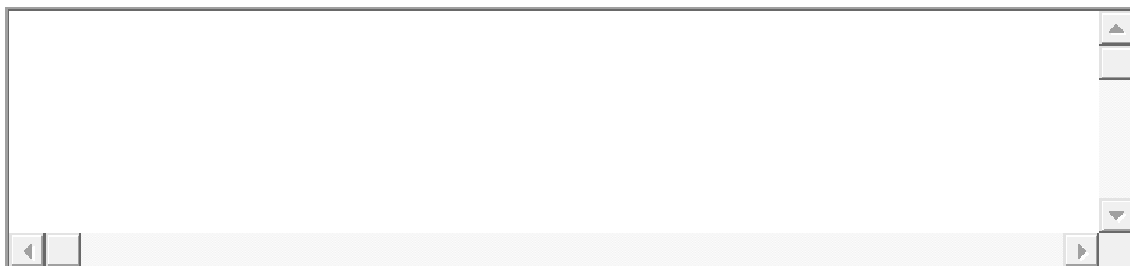
We invite views on any aspect of our proposals that might have an impact – positive or negative – in relation to equality. For example, we are aware that the change we are considering to the two-year work experience requirement may affect groups differently.

7. Do you think there is anything in the standards or suggested changes to the criteria for registration that disproportionately affects any particular group over others?

No

While many of the drivers are moving pharmacy technicians into patient facing roles it is essential that we continue to support the development of pharmacy technicians in specialised areas such as procurement and aseptics. There must be clear frameworks that will support this development post qualification.

If you have any other comments, please add them here:

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