



British Pharmaceutical Students' Association

Draft Response to the GPhC's Proposed Changes to Initial Education and Training Standards for Pharmacists

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The Official Student Organisation of the Royal Pharmaceutical Society

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Introduction

The association produced a survey to solicit the views of students on the proposed changes to initial education and training standards for Pharmacists. We have drawn upon these responses to formulate the below response. We will be submitting a formal response prior to the deadline on the 3rd of April, we thus seek for comments to be made on the below draft.

Section 1: Learning outcomes

1. Considering the full set of learning outcomes in Part 1 of the draft initial education and training standards, to what extent do you agree or disagree that these are appropriate learning outcomes for a pharmacist?

- *Tend to agree*

2. Is there anything in the learning outcomes that is missing or should be changed?

- *Yes*

3. Which of the following areas need additions and/or amendments? (Please tick all that apply)

- *Professional knowledge and skills*
- *Collaboration*

4. Please give a brief description of the additions and/or amendments you think are needed (if possible, please give the reference numbers of the learning outcomes).

Our survey found that students had mixed feelings about the revised learning outcomes, students were divided about the principle of the learning outcomes being amended.

The association believes that learning outcomes 3.14 and 4.1 should be adapted.

3.14 Demonstrate effective diagnostic skills to decide the most appropriate course of action - Does

The association believes that the learning outcome 3.14 should be refined to clarify if Student Pharmacists will be expected to be able to diagnose all conditions at the point of completion of their



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degree. We also seek to clarify why the expectations of Pharmacists concerning diagnosis have increased given that current Pre-registration Pharmacists are required to "show how to identify and employ the appropriate diagnostic or physiological testing techniques to inform clinical decision making".

The new outcome suggests that upon completion of the initial five years of training, Pharmacists will be required to be able to make diagnostic decisions alone and do so in a real environment rather than merely being expected to employing diagnostic techniques and adjusting treatment accordingly in a simulated environment e.g. a classroom.

We asked students for their views on 3.14, they were largely happy with it although they cautioned the notion of being expected to diagnose any condition, pointing out that they would be happy to diagnose some conditions namely common ailments but that others would require extra training. Increased remuneration as a result of acquiring and utilising such skills appeared to be a common theme. The need to have a clearly defined role and ensure that such changes do effectively open the door for Pharmacists to be more affordable (cheaper) GPs. Generally speaking respondents welcomed the idea and pointed out that Pharmacists are increasingly expected to partake in the diagnosis of conditions.

We urge caution, given the significant increase in responsibility.

The association believes that the term 'clinical leadership' is ambiguous and may be interpreted differently by providers as well as students thus detracting from the ethos of learning outcome 4.1. The notion of newly qualified Pharmacists being required to lead others in a clinical setting is worrisome, we do however appreciate that this may not be the spirit of learning outcome 4.1. We do however welcome the requirement for newly qualified Pharmacists being required to have the ability to have leadership over clinical management. The aforementioned examples could both be interpreted as clinical leadership hence our request for the term to be defined explicitly. It is worth noting that the association is strongly in favour of Domain 4.

And lastly we seek to clarify how 3.5 (Ensure the quality of ingredients and medicines to produce and supply safe and effective medicines and products) would be demonstrated and evaluated.

It is worth noting that 'This association believes that the pharmacy course should introduce upcoming technologies such as personalised medicines and pharmacogenetics into the curriculum that will affect current and future pharmacists (2017).'



Section 2: Standards for providers

5. Considering the full set of standards and criteria in Part 2, to what extent do you agree or disagree that these are appropriate for the initial education and training of pharmacists?

- *Tend to agree*

6. Is there anything in the standards or criteria that is missing or should be changed?

- *Yes*

7. Which of the following areas need additions and/or amendments? (Please tick all that apply)

- *Domain 1 – Selection and admission*
- *Domain 3 – Resources and capacity*
- *Domain 8 – Learning in practice (Pre-registration)*

8. Please give a brief description of the additions and/or amendments you think are needed.

The Association welcomes initiatives borne to hold students to a higher standard, we do however urge that this expectation is applied to training providers. We are of the belief that high standards depend on mutual commitment to excellence.

Our stance on admissions is detailed later in this consultation.

The Association would urge the Regulatory body to explore the possibility of amending outcomes to include or suggest a minimum number of weeks/days for blocks of 'Learning in Practice.' We also would urge the Regulatory body to request that Schools of Pharmacy publish the manner in which blocks of 'Learning in Practice' are organised to prospective students and feel that it is imperative that schools outline the nature of these blocks i.e. The sector in which they take place and geographical locations that they may take place in. We queried the importance of this with students. The vast majority of students felt that the way in which placements are organised and the sector of the placements offered by the School of Pharmacy's influence the way in which they choose what university to attend. Hence our request for schools to clearly advertise the manner in which 'Learning in Practice' will be



orchestrated at their universities to ensure that students get the programme and experience they intended to get. This may be partly due to concerns surrounding funding, namely for travel, some students may not have the means to afford to travel to regular placements without subsidising travel or being fairly compensated.

Section 3: Integrating the five years of initial education and training

9. Do you agree or disagree that we should set integrated standards for the five years of education and training?

- *Tend to disagree*

10. Please explain your response.

Most students disagreed with the notion of setting integrated standards for the five years of education.

However, most students felt it was feasible for students to be at the standard proposed by the GPhC at the end of the first five years of education. Our responses indicated that concern was largely due to the implementation of the standards.

Whilst we questioned our members on the principles of the standards alone, it was clear that thoughts concerning the proposal were intertwined with thoughts concerning implementation and logistics.

This indicates the importance of the role of logistics and the work undertaken to engage stakeholders to enforce standards in a way that does not adversely affect current and potential students.

Many responses lauded the proposal to have an integrated degree albeit merely theoretically and were not convinced that it could be enforced in a way that did not negatively affect students. It was widely believed that the proposals were not written with the interest of students development in mind but rather a result of financial constraints.

- Responses pointed out the benefit of having long periods of time in one workplace to facilitate the adjustment from student-to-professional life e.g. navigating the process of earning a wage, working in a new environment and building lasting relationships with members of a team.



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- Respondents highlighted the need to not overlook the importance of being part of a team, arguing that this aspect of working life may make students more comfortable and thus result in students finding it easier to learn and understand the role of a Pharmacist.
- Several responses indicated that placements earlier in the degree (in first and second year) as part of 'Learning in Practice,' would not be beneficial in a practical sense due to the inability to utilise knowledge (as they would not have acquired a wealth of knowledge), the usefulness of such students to teams at this stage was also questioned.
- Support was given to the increased role of Schools of Pharmacy in the education of students during the equivalent of a 'pre-registration' year or period.
- Many responses indicated that they welcome the proposal if they are paid, thoughts were also largely based upon whether students would have to pay tuition fees in the final (fifth) year. This notion was strongly argued by a large amount of respondents. The attractiveness of the course was also called into question.

Section 4: Selection and admission requirements

11. Do you agree or disagree with our proposal to require schools of pharmacy to assess the skills and attributes of prospective students as part of their admission procedures?

- *Don't know*

12. Please explain your response.

We believe that these qualities need to be defined and should be reminded that university acts as a means to activate potential.

13. Do you agree or disagree with our proposal to make an interactive component mandatory in integrated initial education and training admission procedures?

- *Strongly agree*



14. Please explain your response.

The vast majority of responses to our survey advocated for the use of mandatory interviews. This component should be accessible to all, a robust process is needed to ensure that no group is advantaged/disadvantaged.

15. To achieve this balance, should we be more prescriptive about admissions requirements?

- *Yes*

16. Please explain your response.

Most students that participated in our survey felt that the GPhC should be more prescriptive about admissions. We do however understand the school of thought for allowing Schools of Pharmacy to have autonomy over it, if Schools of Pharmacy feel capable of transforming students from A to B and producing students that are capable of joining the register then it could be argued that they are best equipped to set a minimum standard. Some also believed that the role of the regulatory body is to decide who gets on to the register, but not the course.

17. Should we continue to allow unconditional offers?

- *Yes*

18. Please explain your response.

Most respondents felt that universities should be able to offer unconditional offers.

Section 5: Experiential learning and inter-professional learning

19. Do you agree or disagree with our proposals in regard to:

Experiential learning (practical learning)?

- *Tend to agree*



Inter-professional learning?

- *Strongly agree*

19. Please explain your response.

We passed the following motion at our conference in Durham: This association believes that schools of pharmacy should promote interprofessional learning (IPL) through academic and social activities with other healthcare students (2017). We are of the belief that funding has an integral role in the implementation of IPL(E) and placements, we recognise that it would be demotivating for students to not be remunerated, other expenses such as travel (both financially and mentally) should be considered. It is also worth noting that a lot of students work in Pharmacy settings regularly often to fund their degree, the proposal may limit their ability to seek work. Some students may find themselves on placement undertaking work during the week as part of their degree that they may well be paid for at the weekend. We urge the regulatory body to use Ireland as a case study to avoid replicating the woes seen across the Irish sea. Changes may not only impact the attractiveness but may well prevent some from studying the degree.

Students argued that the quality of placements and the ability to have placements in several sectors would affect their opinions of the proposal to have 52 weeks of placements.

Students felt that having lengthened placements may influence their ability to do academic assignments and ultimately pass the degree.

Support was given to having a large period of time at the end of the degree to consolidate knowledge.

Some responses suggested that the splitting up of placements may hinder learning.

The weighting of the fourth and fifth year towards the overall degree grade was also questioned.

It is worth noting that 'the association believes that all pharmacy undergraduate students should be exposed to clinical environments from the first year of study (2016).'



Section 6: Learning in practice (pre-registration) supervision

20. Do you agree or disagree with our proposal to replace the current four tutor sign-offs with more regular progress meetings between learning in practice supervisors and student pharmacists?

- *Strongly agree*

21. Please explain your response.

Whilst we welcome the increase in the quantity of meetings we also advocate for an increase in the quality of such meetings and relationships.

22. Do you agree or disagree with our proposal to replace the current pre-registration performance standards with the learning outcomes stated in Part 1 of the revised standards?

- *Strongly agree*

23. Please explain your response.

Pharmacy is rapidly evolving and the current standards do not reflect changes made in the last five years, an update is needed to ensure that there is synergy with the rest of the healthcare community.

Section 7: Impact of the standards

24. We want to understand whether our proposals may discriminate against or unintentionally disadvantage any individuals or groups sharing any of the protected characteristics in the Equality Act 2010. Do you think our proposals will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below? (Please tick all that apply)

- *Age*
- *Pregnancy and maternity*



25. We also want to understand whether our proposals may benefit any individuals or groups sharing any of the protected characteristics in the Equality Act 2010. Do you think our proposals will have a positive impact on certain individuals or groups who share any of the protected characteristics listed below? (Please tick all that apply)

- *None of the above*

26. Please describe the impact and the individuals or groups that you have ticked in questions 24 and 25.

Those with commitments outside of university may be negatively affected (those that work alongside university).

Students with low incomes may also refrain from applying to the degree due to the increased length of the degree.

Students may be at a loss financially if they have to fund travel to placements.

Mature students and those with children may find it harder to contend with 'Learning in Practice' and may be more likely to be impacted by a potential decrease in income.

26. Do you think any of the proposed changes will impact – positively or negatively – on any other individuals or groups? For example, student pharmacists, patients and the public, schools of pharmacy, learning in practice providers, pharmacy staff, employers.

- *Yes*

27. Please describe the impact and the individuals or groups concerned.

Students were divided on how the proposed standards would affect the attractiveness of a Pharmacy career/degree. A third of respondents felt it would be positive, a third felt it would be negative and a third felt that it would not have an influence.

When asked whether the changes would impact Pharmacy students positively or negatively, most respondents felt it would have a negative influence, however a significant amount of respondents also felt it would be positive.

Queries



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Students asked if they would be paid for the work they do during 'Learning in Practice?'
Students queried the impact of the proposal on tuition fees?
Students also queried when the implementation would take place.

We would request that 6.6 is clarified

We seek to ask whether students would still graduate with an MPharm, our responses indicated that they would expect the qualification weighting to increase in line with integration and furthermore suggested that this may be a means to increase attractiveness to the course. Changing the course to a DPharm or PharmD was alluded to.

Some students may seek to cease studies, part way through the course as such we seek to enquire what degree students would graduate with if they finished after their third year and also if they finished after four years of study.