

Education and training of pharmacist independent prescribers: guidance to support the introduction of the revised entry requirements

October 2022

Education and training of pharmacist independent prescribers

The publication of our standards for the initial education and training of pharmacists (IETP) in January 2021 introduced some major changes that will allow pharmacists to play a much greater role in providing clinical care to patients and the public from their first day on the register, including through prescribing medicines.

From 2026, pharmacists joining the GPhC register will automatically be annotated as independent prescribers if they:

- have been fully trained to the 2021 initial education and training of pharmacists standards
- passed the GPhC registration assessment, and
- meet our criteria for registration

We do, however, recognise that a large proportion of pharmacists who are already registered, as well as those due to join our register before 2026, will not automatically receive this annotation. They will need to achieve a Practice Certificate in Independent Prescribing before they can apply for annotation as a prescriber. To be awarded the practice certificate they must successfully complete a GPhC-accredited pharmacist Independent Prescribing (IP) course. Accredited independent prescribing courses are offered by higher education institutions (usually universities) and are typically delivered through a combination of face-to-face teaching sessions and self-directed study.

Currently, there are two routes to gaining an independent prescriber annotation:

- as part of the initial education and training, and
- through a free-standing training course

Following a consultation in November 2021, we have revised the entry requirements for training as a pharmacist independent prescriber which will enable more pharmacists to begin their independent prescribing training, and have removed the following requirements:

- for registered pharmacists to have **two years of clinical practice** before they can enrol on an accredited independent prescribing course
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- to have relevant experience in a **specific clinical or therapeutic area** before they can enrol on an accredited independent prescribing course

These have been replaced with new entry requirements that state:

- Applicants must have **relevant experience** in a UK pharmacy setting and be able to **recognise, understand and articulate the skills and attributes required by a prescriber**. This experience and awareness will act as the basis of their prescribing practice whilst training.
- For the purposes of developing their independent prescribing practice applicants must identify **an area of clinical or therapeutic practice on which to base their learning**.

This guidance

The purpose of this document is to support the introduction of the new entry requirements. It is relevant for course providers, course applicants, and GPhC accreditation panel members, and gives some specific suggestions and examples of what we may expect the course provider and course applicant to demonstrate. It should not, however, limit or prevent course providers and applicants from using other examples and/or experiences. In addition to this guidance, consideration should also be given to any other appropriate documents (see the useful resources section below).

The learning and professional development continuum

Training to be a pharmacist independent prescriber is part of a learning and professional development continuum. It begins before registration and continues once registered. Until 2025, when independent prescribing training will be embedded in the five years of initial education and training, pharmacists will train to become independent prescribers by studying on a free-standing course accredited by the GPhC. It can be supplemented and enhanced by other post-registration activity provided by professional bodies, training providers, universities, and others.

Applicants must have relevant experience in a UK pharmacy setting

Applicants must be able to provide examples of relevant experience in a UK pharmacy setting and course providers must demonstrate that they have a process in place to consider and review these.

An applicant's experience should be meaningful and highlight outcomes that evidence both significant and positive impact on patient care.

Whilst patient care will be central to every applicant's experience, it is important to recognise that 'relevance' will look different from applicant to applicant. Therefore, the experience should be assessed by the course provider on an individual basis to determine whether the applicant is ready to enrol on the course.

Their experience could have been obtained, for example:

- whilst studying pharmacy, and could include experiential learning, simulation, summer placements and other relevant activities
- during their foundation training year (referred to as 'pre-registration training' prior to the 2021/22 academic year)
- whilst employed in a pharmacy setting

It is important that reference is made to:

- patient-orientated/person centred experience
- clinical/therapeutic experience
- evidence of continuing professional development

Examples of relevant experience may include, but are not limited to:

- counselling patients whilst working in collaboration with multidisciplinary hospital pharmacy teams on a ward where shared decision making and consideration of patient dignity, capacity and consent are essential
- drug history taking and medication reviews whilst assessing patients' medicines as part of an annual review in a GP practice and where consideration of diversity and cultural differences influences their recommendations
- resolution of prescribing queries potentially in a community pharmacy where service provision to a care home is part of their role
- dealing with ethical dilemmas whilst working in a community pharmacy on a weekend and having to decide whether to supply medicines to a patient who has run out and they cannot discuss this with the patient's GP
- observation/involvement in specialist clinics in their local GP surgery where maintaining patient confidentiality will be essential, particularly as they know many of the patients who attend their community pharmacy
- reflection on practice and recognising their limitations in competence potentially when faced with a request to treat a patient or issue a prescription for a condition that they are unfamiliar with whilst working in a GP practice

The above examples should not be seen as a checklist. They are intended to demonstrate the wide ranging and unique nature of relevant pharmacy experience that can contribute to a pharmacist's overall readiness to enrol on an accredited independent prescribing course. There is not a specific length of time that will determine this. It is the overall breadth and range of relevant experience that is important.

Applicants must be able to recognise, understand and articulate the skills and attributes required by a prescriber

It is important to note that many of the skills required by a prescriber are the same as those of a non-prescriber. Our **Standards for Pharmacy Professionals** should, therefore, underpin an applicant's suitability. There are nine standards that every pharmacy professional is accountable for meeting. They describe how safe and effective care is delivered through 'person-centred' professionalism. The standards are a statement of what people expect from pharmacy professionals and reflect what pharmacy professionals have told us that they expect of themselves and their colleagues. The meaning of each of the standards is explained, and there are examples of the types of attitudes and behaviours that pharmacy professionals should demonstrate, and therefore, are consistent also for prescribing.

An understanding of **scope of practice**, the activities a healthcare professional carries out within their professional role, is fundamental. The healthcare professional should understand that they must have the required training, knowledge, skills and experience to deliver prescribing activities lawfully, safely and effectively. Scope of practice should be informed by the individual's professional judgement as well as, for example, regulatory standards, the professional leadership body's position, employer guidance

and evidence-based documents and guidance from other relevant organisations, such as NHS guidelines or journals.

The 2021 IETP standards have determined key learning outcomes that a trainee pharmacist would be expected to demonstrate upon registration in relation to being a prescriber, and we would expect the applicants to understand these and their importance when prescribing medicines. These also align to the RPS Prescribing Competency Framework (see below).

These are:

- recognise the psychological, physiological and physical impact of prescribing decisions on people
- consider the quality, safety and risks associated with medicines and products and take appropriate action when producing, supplying and prescribing them
- take responsibility for the legal, safe and efficient supply, prescribing and administration of medicines and devices
- apply the principles of clinical therapeutics, pharmacology and genomics to make effective use of medicines for people, including in their prescribing practice
- critically evaluate and use national guidelines and clinical evidence to support safe, rational and cost-effective procurement for the use, and prescribing of, medicines, devices and services
- apply relevant legislation and ethical decision-making related to prescribing, including remote prescribing
- prescribe effectively within the relevant systems and frameworks for medicines use
- understand clinical governance in relation to prescribing, while also considering that the prescriber may be in a position to supply the prescribed medicines to people
- use tools and techniques to avoid medication errors associated with prescribing, supply and administration

The **RPS Prescribing Competency Framework for all Prescribers** describes the demonstrable knowledge, skills, characteristics, qualities and behaviours for a safe and effective prescribing role and sets out what good prescribing looks like. It is a generic framework that can be used by any prescriber at any point in their career, regardless of their professional background. It should, however, be contextualised to reflect different areas of practice, levels of expertise and settings.

There are ten competencies within the **framework** which are presented in two domains and describe the knowledge, skill, behaviour, activity or outcome that prescribers should demonstrate.

Domain one - the consultation

This domain looks at the competencies that the prescriber should demonstrate during the consultation.

Domain one contains the following competencies:

1. Assess the patient
2. Identify evidence-based treatment options available for clinical decision making
3. Present options and reach a shared decision
4. Prescribe
5. Provide information
6. Monitor and review

Domain two - prescribing governance

This domain focuses on the competencies that the prescriber should demonstrate with respect to prescribing governance.

Domain two contains the following competencies:

7. Prescribe safely
8. Prescribe professionally
9. Improve prescribing practice
10. Prescribe as part of a team

Each of these competencies contains several supporting statements related to the prescriber role, which describe the activity or outcome that the prescriber should actively and routinely demonstrate.

We would expect applicants to have a broad understanding of this framework and use this as the basis for recognising, understanding and articulating the skills of a prescriber specifically. This, alongside their understanding of the standards for pharmacy professionals and consideration given to scope of practice, is fundamental to confirm that an applicant has the appropriate knowledge to commence as a pharmacist independent prescriber in training.

Based on the above, we would suggest some notable examples of the skills and attributes required by a prescriber that may include, but are not limited to:

- demonstrating person-centred care
- applying professional judgement and professionalism
- using effective communication skills
- utilising diagnostic and consultation skills
- using wide ranging information gathering skills
- using critical appraisal, clinical reasoning, and decision-making skills
- considering prescribing governance
- cognisant of reflective practice
- collaboration, team working and multi-disciplinary engagement

Applicants should be able to demonstrate a thorough understanding of how their personal experience has strengthened their understanding of the role of prescriber and has supported how they recognise, understand and articulate the skills of a prescriber. This will be unique to each applicant, however, this in combination with their relevant experience in a UK pharmacy setting should be considered on an individual basis, to gain assurance that they are suitable candidates to commence on an independent prescribing course.

Applicants must identify an area of clinical or therapeutic practice on which to base their learning

Pharmacist independent prescribers in training will need to identify an area of clinical or therapeutic practice on which to base their learning and develop their independent prescribing practice. This does not necessarily have to align to previous experience or a specific area of competence.

The purpose of identifying an area of clinical or therapeutic practice is to focus learning and support course providers to make it simpler to contextualise the theory when translating that to prescribing. The skills and attributes of a prescriber, however, are generic and transferrable across any clinical or therapeutic area.

The identified area of clinical or therapeutic practice can be either specialist or generalist.

Once a pharmacist has successfully completed the training, they can apply to the GPhC for an annotation to their entry on the GPhC's register. The annotation is a public record that they can practise as an independent prescriber. Pharmacists should, however, only prescribe within their area of competence upon annotation.

It is accepted that, provided the pharmacist independent prescriber expands their scope of practice subsequently, they can prescribe accordingly.

Assessing an applicant's suitability

Any process to assess an applicant's suitability must be consistent, not disadvantage any individual or sector, and should include acquiring an understanding of their:

- work experience (including pre-registration/foundation training)
- clinical or therapeutic experience
- patient-based experience
- evidence of CPD

This information could also provide evidence that are able they recognise, understand and articulate the skills and attributes required by a prescriber, however, would need to be confirmed by the course provider. It is worth noting that applicants do not need to demonstrate evidence of having the skills and attributes, only that they are be able to recognise, understand and articulate them.

Course providers can ascertain this information in any way they choose, however, they must be satisfied that the applicant is suitable to commence training. For example, they may wish to:

- review and assess the submission of a supporting statement from the applicant
- review the applicant's CV
- review a template listing the skills and attributes of a prescriber to which the applicant has provided evidence of their understanding
- carry out an interview
- consider a letter of recommendation/supporting statement

It is also the applicant's responsibility to ensure that they consider any key documents, possibly provided by the course provider or proactively by themselves, that they provide evidence and give thought to their area of clinical or therapeutic practice on which they intend to base their learning.

Course providers should be satisfied that an applicant's individual experience and supporting evidence of their relevant experience in a UK pharmacy setting, alongside their ability to recognise, understand and articulate the skills of a prescriber, are credible and meaningful in their totality. These should provide assurance that they are suitable candidates for commencing an independent prescribing course.

Useful resources

This document should be read alongside the following relevant publications:

- **GPhC 'Standards for the education and training of pharmacist independent prescribers'**, January 2019, updated October 2022
 - **GPhC 'Standards for pharmacy professionals'**, May 2017
 - **GPhC 'Guidance on tutoring and supervising pharmacy professionals in training'**, updated August 2018
 - **GPhC 'In practice: Guidance for pharmacist prescribers'**, November 2019
 - **GPhC 'Guidance for registered pharmacies providing pharmacy services at a distance, including on the internet'**, updated March 2022
 - **RPS 'A Competency Framework for all Prescribers'**, September 2021
 - **RPS 'A Competency Framework for Designated Prescribing Practitioners'**, December 2019
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