



Community  
Pharmacy  
Scotland

**The Institute for Apprenticeships  
consultation on the creation of a  
Pharmacist Apprenticeship**

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# Who are Community Pharmacy Scotland (CPS) & what do they do?

## Who we are

We are the organisation which represents community pharmacy contractor owners in almost every aspect of their working lives, and are the voice of these vital healthcare professionals as they deliver pharmaceutical care to the people of Scotland.

We are empowered to represent the owners of Scotland's 1256 community pharmacies and negotiate on their behalf with the Scottish Government. This covers all matters of terms of service and contractors' NHS service activity including remuneration and reimbursement for the provision of NHS pharmaceutical services.

## What we do

We work with the Scottish Government on the development of new pharmaceutical care services and ensure that the framework exists to allow the owners of Scotland's community pharmacies to deliver these services.

The Scottish community pharmacy contract puts the care of the individual right at its centre and with its focus on pharmaceutical care and improving clinical outcomes, community pharmacy contractors and their employee pharmacists are playing an increasingly important role in maximising therapeutic outcomes and improving medicine safety. Community pharmacy is at the heart of every community and plays an important part in the drive to ensure that the health professions provide the services and care the people of Scotland require and deserve.



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## Introduction

CPS has already responded to the two NHSE consultations which preceded this latest set of guidelines for CCGs. Our rationale for responding to an England-only consultation remains that our NHS Scotland colleagues will look south of the border to existing guidance when deciding how best to make efficiencies in a financially challenging climate. Whilst this is not necessarily a bad thing, some of the guidance that has emerged so far would have a negative impact on contractors and the communities they serve.

The “Low priority prescribing” project group will continue to work indefinitely to produce guidance which reflects best value for NHS money. Their approach is to identify and assess items which are deemed as:

- Of low clinical effectiveness or have significant safety concerns
- Are clinically effective but there are more cost-effective products available (Includes products which have been subject to “excessive price inflation”)
- Are clinically effective, but due to the nature of the product, are deemed a low priority for NHS funding.

The full consultation document can be accessed [here](#). Our draft response is included below for simplicity.

## **Do you support the development of the Apprenticeship Standard set out in the proposal?**

### **Comment**

- The development of an apprenticeship pharmacist role could be considered for the profession, however this proposal is not well enough developed to allow us make such a key decision. The introduction of an apprenticeship model would be a step-change in how people enter the profession, and all affected must explore and appreciate the implications of this. That the proposal appears to have been developed in relative isolation is to its detriment, as we must understand what the impact upon the profession, the public, patients, prospective students, higher education institutions or employers in a wider sense are, and a short consultation which is not advertised will not provide this.
- The occupation has not been competently defined.
- Without further detail – in particular the split between time spent in higher education and time spent training on the job – we could not support the development of this apprenticeship.

## **Do you recognise this occupation and is it in demand in the labour market?**

Yes.

### **Comment**

- There is a projected shortage of qualified pharmacists in the Scottish labour market and CPS understands that the market in the rest of the UK is also likely to follow this trend.

## National Qualifications Framework Equivalency Table

The table in this [link](#) explains the National Qualifications Level and their equivalent.

### Comment

- Currently, Pharmacists in Scotland spend 4 years in University with some experiential learning interspersed throughout. They then embark on a year's "on the job" training. The GPhC consider this balance of study necessary to ensure that the appropriate minimum underpinning knowledge is obtained and put into practice by pharmacy students, so it is safe to say that this occupation requires more training than this question asks.
- However, there is no mention of a proposed split between time spent in education and on-the-job training. The time in formal education would need to amount to at least as long as the current 4 years less the experiential learning.

## Are you aware of any other existing or proposed apprenticeship standards that could deliver this occupation?

No.

### Comment

- No and we do not necessarily oppose the creation of apprenticeship standards in this occupation. However, it would require further exploration and extensive consultation with many representative bodies, the regulator, employers, professionals and university teachers to formulate such a proposal.

## **Continued...**

Although the introductory text to the proposal suggests that wide-ranging stakeholder engagement has taken place to develop the proposal, we see no evidence of this.

## **Does the occupational profile define what is needed to undertake the occupation competently? If 'No', please give details of what it should include.**

No.

## **Comment**

- No, it merely describes a pharmacist and has assigned an arbitrary number of days required to obtain the necessary skills as though they were one-off accomplishments rather than aiming to instil the professionalism and attitudes of lifelong learning in those undertaking the proposed apprenticeship.
- CPS would require a much longer consultation period to answer this question adequately.

**Do you consider the proposed occupation to be sufficiently wide-ranging to allow an apprentice to develop transferable skills that will enable them to perform this role across the wider sector?**

Yes.

**Comment**

- Yes, the pharmacy profession allows individuals to acquire a huge range of transferable skills. Again, how this could be applied to an apprenticeship would need much more detailed consultation than has been offered by the Institute for Apprenticeships.

**Do you have any other comments?**

- CPS is concerned that this consultation was not well advertised.
- It could be possible to create an apprenticeship scheme to train pharmacists that would be an asset to the profession, but this proposal does not meet that requirement.