

## **NMC response to the General Pharmaceutical Council consultation on changes to requirements for training as a pharmacist independent prescriber**

- 1 Thank you for the opportunity to respond to your consultation on the proposed revisions to the education and training requirements for pharmacist independent prescribers. Increasing the number of non-medical healthcare professionals who are able to independently prescribe is something that both of our organisations have long seen as important to modern, safe, effective person-centred care delivery and in improving patient safety and public protection.
- 2 With the move towards pharmacists becoming a profession who can legally prescribe at the point of qualification and entry onto the register, the context of their future education, training and regulation warrants further consideration, particularly in the area of independent prescribing.
- 3 Although nurse and midwife independent prescribing has a different legal framework we recognise the need for the General Pharmaceutical Council to consult on ways to bridge this gap for existing registered pharmacists who currently can only access independent prescribing programmes beyond initial registration.
- 4 With the above in mind, our comment are as follows.

### **Should the two-year time requirement for entry to free-standing pharmacist independent prescribing training be removed?**

- 5 As part of our strategic education change programme we developed education and training standards that are outcome focused to replace standards that require inputs and processes. This move has been welcomed by our stakeholders.

### **Should the requirement to have relevant experience in a specific clinical or therapeutic area be removed and replaced with the requirement to have relevant experience in appropriate clinical setting(s)?**

- 6 Yes.

### **Should we retain the requirement that applicants must identify an area of clinical or therapeutic practice on which to base their learning?**

- 7 Yes, as this will inform the selection process and subsequent prescribing student journey and their learning and assessment throughout their prescribing programme in relation to their developing scope of prescribing practice and competency achievement.
- 8 We welcome your inclusion of questions that monitors the impact of your plans on different groups. Throughout our education change programme equality impact assessments were an integral part of our evidence review alongside the equality

monitoring questions when we conducted our prescribing consultation in 2017. The benefits of this approach informed this important aspect of standards development and in supporting widening access onto prescribing programmes.

We look forward to seeing the outcomes of this consultation.

Yours sincerely

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