Council meeting 6 & 7 June 2006 PUBLIC BUSINESS

Recognising the education and training of overseas pharmacists

Purpose
To reconfirm the principle of delivering OSPAPs (Overseas Pharmacists' Assessment Programmes) overseas.

Strategic objective domain

- Recognised as world leading and world class
- An organisation that consistently performs as a regulator, professional representative leader and publisher

Recommendation
On the recommendation of the Education Committee, Council is asked to agree the proposals below which allow OSPAPs to be delivered outside Great Britain in the circumstances and through the procedures described, which include defining appropriate periods of pre-registration training. These procedures are a revision to those agreed by the Council in December 2005.

1 Introduction

In 2003 the Society took the decision to end all reciprocal registration agreements for overseas pharmacists, except with Northern Ireland and those for EEA nationals (the latter being the subject of binding EC legislation). The decision was controversial but the Society was clear it had acted appropriately and in line with legislation stemming from the 1999 Health Act. (In ending such agreements the Society was not alone: the General Medical Council and General Dental Council had done the same.) A consequence of ending reciprocal agreements is that pharmacists from the countries concerned would have to take the Society's approved entry route for overseas pharmacists in order to apply to enter the Register.

The Society's approved route to registration for overseas pharmacists is a one year, full time conversion qualification – an OSPAP (Overseas Pharmacists' Assessment Programme) - taught by three GB universities, followed by a year's pre-registration training and the Society's Registration Examination. The course is open to pharmacists who are registered or are eligible to be registered outside Great Britain. For pharmacists from countries with pharmacy training of a type considerably different from GB's this route is appropriate; for pharmacists from countries with similar training it is probably too onerous. For this reason the Society decided to explore alternative recognition routes for pharmacists in the latter category.

On 20 October 2005 *Directive* 2005*/36/EC of the European Parliament and of the Council on the recognition of professional qualifications* came into force. Since then the Education and Registration Directorate has been assessing its impact on the work of the Society and working with the Department of Health to ensure its implementation in national law on or before the 20 October 2007. Of relevance to this proposal is Preamble 10: 'This Directive does not create an obstacle to the possibility of Member States recognising in accordance with their rules, the professional qualifications acquired outside the territory of the European Union by third country nationals. All recognition should respect in any case minimum training conditions for certain professions.' This proposal does just that. Additionally, as is mentioned

above, it includes provision for flexible periods of preregistration training for certain categories of applicants in clearly prescribed circumstances.

2. Principles

The current OSPAP is a robust, quality assured conversion qualification, pre-registration training and the Registration Examination are clearly defined. Any variants must exhibit similar qualities, in particular they must be equitable, of a high standard, legal and cost-effective.

2.1 Equity

The advantage of the current GB OSPAP is that the syllabus, graduate outcomes and assessments are common across all providers. If the Society decides to allow in-country variants it must be able to assure itself that the end products are equivalent and that at the point of first registration in GB applicants have had equivalent educational experiences. Using the existing OSPAP as a starting point is a logical way of doing this.

An analysis of the Register tells us that the Society has a significant number of applicants from a small number of countries and a far smaller number from others. If the Society receives applications for the delivery of an in-country OSPAP we can be reasonably sure where those applications will be from. The process below permits applications from any country, but we have set the threshold very high: there must be evidence of meaningful quality assurance at every level from national, institutional to course level for the Society to devolve responsibility for delivery to a provider overseas.

As GB pharmacy graduates enter the Register at Masters level an in-country OSPAP should be at Masters level. Also, as entry to OSPAPs is open to persons who have qualified outside Great Britain and are registered or eligible to register in another jurisdiction, it will be necessary to take account of post-graduation training equivalent to the UK preregistration training year. Only if the academic learning outcomes of a pharmacy degree and post-graduation competencies of post-graduate training in a given jurisdiction are explicit and can be mapped onto the Society's requirements can an in-country OSPAP be created and a proportionate period of pre-registration training defined.

An OSPAP which maps both academic learning outcomes and post-graduation competencies will be able to verify the skills mix of a registered pharmacist from a particular jurisdiction. The post-qualification training will be accredited through a GB university's Accreditation of Prior Experiential Learning mechanisms and, in combination with an accredited in-country OSPAP, will be at least equivalent to a GB OSPAP in terms of academic level and credit rating. The following proportionate period of pre-registration training will contextualise that education and training in GB practise.

To place an in-country OSPAP student in the same position as a GB OSPAP student they must be fully qualified and eligible to register as a pharmacist in another jurisdiction before they begin the course.

In summary, the sequence of events would be:

- Pass degree which is at least four years long
- Pass post-qualification training (GB preregistration equivalent) which is at least three months;
- Pass In-country OSPAP;

- Pass a proportionate period of pre-registration training in Great Britain. *This is a change from the previous policy which only allows for year long pre-registration training*;
- Pass the registration examination (June or September).

2.2 Assuring standards

The arrangements for delivering an in-country OSPAP are more complicated than for a GB OSPAP because it will involve collaboration between a GB university (GB Applicant Institution, GBAI) and an overseas institution (Overseas Application Institution, OAI). In itself this is not an insurmountable problem: along with the US, Canada and Australia, Great Britain is an international market leader in the delivery of courses overseas. Nevertheless, the Society's regulatory responsibility requires it to be doubly sure the OAI is bona fide with a good track record in delivering (pharmacy) degrees. The following requirements must be met for a step 1 application to be accepted (see below for a definition of the step application process):

1. the GBAI must run a fully accredited MPharm and OSPAP;
2. the OAI must run a pharmacy degree fully accredited by a recognised competent authority;
3. the OAI's degrees must be recognised by UK NARIC as being equivalent to those in the UK and, for pharmacy, must be 4 years long;
4. students holding the OAI's pharmacy degree must enter documented post-graduation training similar to the UK pre-registration year;
5. the OAI must operate in a higher education context with quality assurance systems at the national, institutional and course level which should, in all three instances, meet the *European Quality Assurance Standards* (for Higher Education);
6. the accreditation/validation process for the OAI's professional pharmacy degree should meet Part 2 of the *European Quality Assurance Standards*;
7. The academic relationship between the GBAI and OAI must meet the standards in the *Collaborative Provision and Distance Learning* section of the Quality Assurance Agency's *Code of Practice for Higher Education*;
8. The minimum English language requirement for all OSPAP students will be IELTS 7 in every test category.

The essence of in-country OSPAPs is to be as flexible as is reasonable while maintaining standards. It would be academically undesirable to allow in-country OSPAPs to be designed for students who would benefit from a sustained period of study in Great Britain as part of their orientation to practise. For this reason it would be academically appropriate to place a limit of the size of an in-country OSPAP at 60 Masters level credits (half an academic year's study).

As stated above, the period of pre-registration training following successful completion of an in-country OSPAP will be determined on the basis of proportionality but should be a at least three months. The purpose of the period of pre-registration training will be to ensure overseas registered pharmacists (or a pharmacists who are eligible to be registered in another jurisdiction) who have passed an in-country OSPAP work in GB as a pre-registration trainee for a period that allows them to contextualise their previous experience and knowledge acquired while studying on an in-country OSPAP. The period of pre-registration training will be defined as part of the in-country OSPAP application process.

Now that the Society accredits collaboratively delivered GB MPharms it can, as part of this proposal, recognise accredited collaborative degrees awarded by overseas institutions.

2.3 Legality

The Society will require a binding contractual Memorandum of Agreement between the GBAI and OAI describing the responsibilities of each institution and stating that the Society has jurisdiction over both institutions so far as the OSPAP is concerned.

The OAI must be recognised by national/state/territorial government as having the right to award degrees, but the OSPAP will be awarded by the GBAI.

Pharmacists applying to enter the register through this route must satisfy the minimum training requirements (MTR) of EC Directive 2005/36 (other than undertaking the MTR outside the EEA, of course). In consequence an in-country OSPAP cannot be created for students whose period of education and training prior to registering is not at least five years in total, comprising at least four years full-time study in a university or other higher education institution and at least six months post-graduation training leading, potentially, to registration. Students whose degrees are shorter than 4 years or who have little or no post-graduation training must apply to take a full UK OSPAP and then enter full pre-registration training in GB.

2.4 Cost-effectiveness

In one sense the cost-effectiveness of the proposal is not the Society's concern, so long as it can be delivered as proposed. Nevertheless, to minimise risk, the Society needs to be reassured the proposal has a sound financial basis. Furthermore, in-country OSPAPs must be cost neutral for the Society.

3. Process for initial accreditation

The proposed accreditation process is in four stages: paper-based exercises and an in-country event, with a second in-country event a year later.

Step 1

A joint application should be made by the OAI and GBAI, confirming support for an in-country OSPAP delivered by the OAI but designed in collaboration with the GBAI (which has primary responsibility for confirming the proposed course and period of preregistration training is suitable for orienting students to GB practice). Documentation demonstrating the OAI's quality assurance procedures will be required: as most mature institutions will have this information to hand in the form of internal/external audit documents, staff handbooks, quality assurance manuals etc… providing these in lieu of a purpose-written document is perfectly acceptable, in fact preferable, as the point of the submission is to ensure the OAI has mature quality assurance procedures.

Little information on the GBAI will be needed at this stage because it will be known to the Society and other information will be obtainable from public sources in Great Britain.

The application will be considered by a small accreditation team in Great Britain at the GBAI. A recommendation will be made to Education Committee and, subject to approval by the Committee, successful applicants will be invited to proceed to step two of the process.

Step 2

The GBAI will undertake a mapping of learning outcomes and syllabus items from the OAI's pharmacy degree against the Society's Graduate Outcomes and MPharm Indicative Syllabus to identify gaps, which will form part of the basis of the proposed OSPAP's syllabus and structure. If students from more than one overseas school will be taking the OSPAP a mapping will need to be undertaken for all schools.

The applicant institutions should then map post-graduation training competencies onto the Society's preregistration competencies. As was the case for the OAI's pharmacy degree, missing competencies will have to be built into the in-country OSPAP.

Finally the GBAI should consider what period of pre-registration training would be necessary to ensure overseas registered pharmacists work in GB for a period that allows them to contextualise their previous experience and the knowledge acquired gained from the proposed in-country OSPAP.

If applicants con be assisted in this process by a competent authority/competent authorities, so much the better.

Then a consolidated mapping report will be submitted to Education Committee and, subject to approval by the Committee, successful applicants will be invited to proceed to step 3.

Step 3

The OSPAP should be approved by each institution (the GBAI and OAI) through their internal validation processes. The course may be residential, taught at a distance, full time or part time. The Society does not need to have a view on the method of delivery other than it must be fit for purpose and able to deliver the syllabus, learning outcomes and competencies identified at step 2. Step 3 documentation will form the basis of an in-country accreditation event by the Society. An accreditation panel will visit for 2 days, as is the case for GB OSPAPs, and the visit will follow the same format, with some variation to take into account the distinctive nature of the proposed provision. Accreditation would be for a fixed period, followed by periodic revisits, to ensure currency.

Successful completion of stage 3 will result in provisional accreditation and will allow the course to recruit students. Formal approval will be granted by Education Committee.

Step 4

As is the case for GB OSPAPs the Society will revisit the OAI after one year to evaluate the course's progress. Successful completion of stage 4 will result in full approval for a period of up to three years. Formal approval will be granted by Education Committee on behalf of Council.

Before expiry of accreditation the Society will return for a reaccreditation visit.

Observers from the competent authority which accredits the OAI will be invited to step 3, step 4 and reaccreditation events.

The sanctions applied to GB MPharms and OSPAPs will apply to in-country OSPAPs: conditions may be imposed at any step and recommendations made. Where the Society is seriously concerned about the delivery or standards of a course, the joint providers may be placed on probation. If the Society's concerns are not addressed in a specified way and to a specified timetable, Education Committee

may ask Council to withdraw accreditation. These procedures are described in relation to MPharms in *Accreditation of UK Pharmacy Degree Courses* (and will be included in other documents which may supercede it).

The timing of steps 1-3 will depend on the Society's accreditation schedule and the speed at which applicant institutions can produce documentation.

4. Conclusions

A revised procedure for delivering OSPAPs overseas will allow pharmacists who have qualified in countries with education and training requirements similar to those in GB – potentially including those covered previously by reciprocal agreements - to demonstrate their competence to apply to enter the GB Register but in a more flexible way than agreed previously. The revision also takes into account feedback on the proposal and the provision in new EC legislation for flexible periods of preregistration training for certain categories of applicants.

5. Risk implications

Capacity: The number of annual applications to join the Register for a given jurisdiction is a rough indication of how many OAIs might wish to make an application (or how many would be advisable in that jurisdiction). As a course would have to be economically viable (or heavily subsidised) the Society anticipates a small, manageable number. The number could increase but the advantage of the proposed system is that OAIs must find GBAIs with the capacity and strategic will to enter into an academic partnership. As is becoming increasingly obvious the ability of academic pharmacy to expand year on year is being put to the test as new schools are opened. Any additional provision must not endanger GB MPharm and OSPAP provision therefore maintaining acceptable staff-student ratios and staff workloads will be a natural brake on forming collaborative partnerships.

The principal risk of new provision is borne by collaborating institutions but the Society will be able to monitor risk to existing provision through the accreditation of GB MPharms and OSPAPs. The sanctions described above will be used where appropriate.

6. Resource implications

As the accreditation process would be cost neutral there are no resource implications but it would be subject to capacity constraints (see 7. below).

7. Recommendation

On the recommendation of the Education Committee, Council is asked to agree the proposals below which allow OSPAPs to be delivered outside Great Britain in the circumstances and through the procedures described, which include defining appropriate periods of pre-registration training.

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