

Office of Students strategy for 2025 to 2030

Office of Students (OfS)

12 December 2024 – 20 February 2025

Introduction

The Pharmacy Order 2010 describes our regulatory role in setting standards for the education and training of pharmacists and pharmacy technicians, and in approving their qualifications and training. Through the approval process, we get assurance that:

- pharmacy education and training takes place safely for everyone involved
- patients and the public can have confidence that pharmacists and pharmacy technicians joining the register are skilled and knowledgeable, and that they demonstrate appropriate professional behaviours as a result of their education and training, and
- pharmacy education and training is carried out in a way that is fair, and provides a positive experience for students and trainees

We approve the following education and training provisions if they have met our standards in full:

- MPharm degrees and Overseas Pharmacists' Assessment Programmes (OSPAPs) that form part of the initial education and training pathway for pharmacists
- foundation training programmes offered by statutory education bodies that lead to eligibility for registration as a pharmacist
- pharmacist independent prescribing courses that lead to annotation on our register as an independent prescriber
- integrated knowledge and competency qualifications offered by awarding organisations that lead to pharmacy technician registration, and
- integrated knowledge and competency courses offered by private providers that lead to pharmacy technician registration

As the pharmacy regulator, we welcome the opportunity to respond to the OfS consultation on strategy proposals which includes plans to use data and intelligence to minimise the regulatory burden and prioritise working with other regulators and agencies to synthesise data and avoid duplication.

Education providers regulated by the OfS can also be providers regulated by the GPhC, and therefore, proposals highlighted in the OfS consultation have the potential to affect pharmacy courses regulated by

us, such as MPharm degrees and Independent Prescribing post-graduate programmes. Taking regard of our regulatory scope over pharmacy education, we can only share views on proposals 1, 2, 4 and 6 and of the OfS consultation as well as the 'How we will regulate' section.

Question 1: Do you have any comments to make on the OfS's proposed strategy for 2025 to 2030 or the priorities set out within it?

The OfS strategy for 2025 to 2030 is clear that it seeks to ensure effective governance for education institutions to be able to successfully navigate an environment of increased financial and strategic risk. The strategy will drive further assurance and collaborative working as necessary to help ensure sustainability of education provision and subsequently benefit learners enrolled on a course of education.

The consultation sets out various commitments surrounding effective governance of education institutions, including testing new education providers prior to registration and a focused approach to monitoring and compliance where risk is high.

Proposal 1

We are aligned in our aims for proposal 1 to ensure that students receive a high-quality education that has a significant and enduring positive impact on their lives and careers, delivered by institutions that continue to improve the quality of their courses. We welcome continuous improvement in education and equality, to help ensure that education institutions continue to deliver high quality academic experiences for their students and safeguard quality in the context of rapid technological change whilst having confidence to take advantage of opportunities that new technologies present.

We also welcome the proposal that equality is to remain central to the OfS approach to regulation to support positive student outcomes, including students from disadvantaged backgrounds.

The principles of equality, diversity and inclusion sit at the heart of our education standards for pharmacy education, and we seek to ensure this through our own approval processes.

Our standards require that equality data in relation to student admission and performance is analysed by protected characteristics on an annual basis and documented action is taken to address differences.

In view of this, we are in general support of proposal 1 as we believe it has the potential to positively impact pharmacy students and trainees from all backgrounds and the quality of education and training.

Proposal 2

We are supportive of proposal 2 which aims to ensure that prospective students have a range of high-quality options and are well equipped to exercise informed choice about what, where, when and how they study. We welcome continuous improvement in initiatives to widening access but through rigorous evaluation of access and participation plans and a focus on activities to raise attainment in schools.

We also ensure that, for example, support and development for MPharm students is put in place by their education providers, including support in all learning environments so they can develop

as learners and professionals during their degree. We have criteria specifically related to student support, which includes the requirement that education providers have systems in place to identify the support their students need, and to support them achieve the learning outcomes and progress on the course. This must include personal, study skills and academic support.

In view of this, we are in general support of proposal 2 as we believe it has the potential to strengthen the support available to pharmacy students and trainees from all backgrounds and drive positive impact on attainment.

Proposal 4

We are supportive of proposal 4 which aims to ensure that students benefit from rich and rewarding wider environments that help them to make the most of their time in higher education. We welcome the OfS commitment to strengthening their understanding of students' experiences and concerns and sharing the findings with institutions, government and others. We also welcome the OfS commitment to continue to work with education institutions to reduce risks to equality of opportunity and drive continuous improvement in terms of the support offered to students to help them succeed in their education, and equally, the OfS commitment to prevent harassment and sexual misconduct and ensure that education institutions respond effectively when such incidents occur.

In view of this, we agree with proposal 4 as it supports a common goal to ensure adequate support for students to help them succeed in their education, including effective management of student concerns.

Proposal 6

We are supportive of proposal 6 which aims to ensure that education institutions have effective governance and successfully navigate an environment of increased financial and strategic risk. We welcome the OfS commitment effectively identify education institutions that are not yet ready to enter the regulated system, and that the regulation of established institutions can facilitate swift action if management and governance issues arise.

Resource, staffing and supporting infrastructure implications continue to be a focal point in our 7-step accreditation methodology for approving MPharm degrees to be delivered by education institutions for the first time.

In view of this, we are in general support of proposal 6 as we believe it has the potential to strengthen the safeguards and assurances that new and existing education providers, including those providing pharmacy courses, are sustainable and able to navigate risk through effective governance.

'How we will regulate'

In addition to our views on proposals 1, 2, 4 and 6, we would like to share our views on 'How we will regulate' section of the OfS consultation.

We welcome proposal to use data and intelligence to minimise the regulatory burden whilst recognising that education institutions regulated by OfS are often subject to multiple regulatory regimes. We welcome the OfS commitment to developing stronger relationships with other regulators and prioritising inter-regulatory working to synthesise data and avoid duplication, and therefore, becoming a more active collaborator with strategic partners, sharing insights and

expertise. We agree that this has the potential to support an easier regulatory environment for education institutions to navigate.

We believe that inter-regulatory working has the potential to alleviate the regulatory burden, and this could be achieved by the multi-use and sharing of existing data and information where appropriate, so that regulatory demands don't adversely impact on education providers' time, effort, workload, administration and cost.

Working alongside other regulators forms part of our strategy 2020-25 and we welcome the opportunity to continue to do so.

Question 2: Do you have any comments about any unintended consequences of the proposed strategy or the priorities set out within it, for example for particular types of providers, particular groups of students, or for individuals on the basis of their protected characteristics?

Although the proposals on which we shared our views have the potential to positively impact the education sector, including pharmacy education, they also have the potential to bring about unintended consequences.

Proposal 1

We believe that it is important to understand exactly how 'significant and enduring positive impact on (students') lives and careers' is defined and measured in order to ensure continuous improvement in education and equality stays within scope and, therefore, avoid unintended consequences.

Proposal 2

A potentially unintended consequence of raising the level of rigor surrounding equality of opportunity and access to education, including raising attainment, may bring risk to the standards of education if not done in a carefully planned and measured way. To avoid this, OfS should ensure that any such changes are fair and proportionate, particularly in terms of the level and nature of support students may receive in order to be able to meet education standards.

Proposal 4

N/A.

Proposal 6

In order to avoid unintended consequences brought by raising the level of rigour surrounding governance and assessment of financial risk for new education institutions, such as risk of potentially hindering new education institutions from opening in geographical areas that most need them, the OfS should ensure that the approach to risk-benefit is balanced, fair and proportionate.

'How we will regulate'

Whilst we are supportive of inter-regulatory working, this will require careful planning and consideration, particularly surrounding data protection and data sharing in order to avoid unintended consequences, such as legal risk.

Question 3: Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why?

No

Question 4: Our previous strategies have covered periods of three years. For this strategy, we are proposing an extended strategy period of five years. Do you have comments on this proposal?

No

5a) Do you think that our proposed 'I statements' appropriately and clearly describe the impact that delivery of our strategic objectives should have on our key stakeholders?

Yes

5b) Do you think that the strategic objectives distilled in our proposed 'I statements' are the right ones? Do you propose any additional 'I statements'?

The proposed statements are broadly in line with what we would be expecting when carrying out our regulatory duties.

If you would like to discuss the points raised in this response, or any other aspect of the GPhC's work, please do not hesitate to contact us.

General Pharmaceutical Council

18 February 2025