

Foundation training 2021/22 – Designated supervisor suitability policy

Contents

Introduction	2
Purpose of policy	2
Policy Statement	2
Application of the policy	3
Appendix – Criteria and assessment framework.....	4

Introduction

The foundation training year is an important and essential part of the process to becoming a registered pharmacist. This period is overseen by a pharmacist who acts as the trainee pharmacist's designated supervisor for the training period and signs them off as competent to practise.

Designated supervisors are in a position of responsibility and are required to act as a role model for their trainee. They must also set a training plan, assess their trainee's performance, and provide feedback and support for their trainee throughout the year. It is therefore essential to have checks in place to ensure those registrants that are designated supervisors meet certain requirements and are of suitable character to undertake, or continue in, the important role of designated supervisor.

To be a designated supervisor, registrants have to meet certain requirements and, in some circumstances, an assessment will be required to determine their continuing suitability to act as a designated supervisor, pending the outcome of a fitness to practise investigation.

Purpose of policy

This policy sets out the criteria a registrant must meet in order to act as a designated supervisor. It further sets out how the GPhC will assess a registrant's suitability to act, or continue to act, as a designated supervisor should they be under investigation by us. It will ensure those that act as designated supervisors are of good character and are suitable to act as a key role model to the trainee throughout the important period of the foundation training year.

It will ensure an appropriate and transparent approach is in place, that is both fair to the trainee and the designated supervisor. The policy also describes what action is taken when circumstances arise when it isn't suitable, or appropriate, for a registrant to continue as a designated supervisor when under investigation. This may be in order to protect the registrant, the trainee and/or the public and will ensure consistent quality supervision during the training year is maintained.

Policy Statement

This document sets out the framework through which the GPhC will assess the suitability of registrants to act, or continue to act, as designated supervisors. It comprises criteria which all prospective designated supervisors must meet. It includes an assessment that is applicable in specific circumstances should the designated supervisor be under investigation at either of the two stages set out below.

A registrant must meet the following requirements to be able to act as a designated supervisor to a trainee:

- a. They are a registered pharmacist in Great Britain
- b. They have been registered for three years or more
- c. They have been practising in the sector, or a related sector¹, of pharmacy in which they wish to supervise

¹ For instance, for those who wish to supervise a trainee pharmacist in general practice.

- d. They satisfy the assessment requirements if they are under investigation by us (there are no current fitness to practise issues, whether these are sanction(s) or condition(s) on their registration, that stops them from being a designated supervisor)

This policy applies at two specific points of the foundation training process:

- Once an application has been received from a trainee
- When a fitness to practise issue arises about the designated supervisor during training

A supervising arrangement cannot be confirmed, or continued, unless the criteria above are satisfied. If a registrant is under investigation, then an assessment through the process as outlined will be necessary.

The process, from receipt of application to confirmation of the supervising arrangement, should take no longer than 28 days. An extension will be considered if further information is sought by the GPhC.

There is no appeal function, however, should new information come to light to support an application then a fresh application should be made.

This framework is independent of any fitness to practise proceedings and the outcome of any assessment cannot be used in, or considered as mitigation (or an aggravating factor), in any proceedings. Full co-operation from the registrant and employer (if applicable) in question is expected in ensuring registrant, trainee and public safety.

We will disclose relevant information (refused supervision arrangements) to the national training organisations (Health Education England, Health Education and Improvement Wales and NHS Education for Scotland) in line with established Memoranda of Understanding.

Application of the policy

This policy sets out the criteria registrants must meet in order to act as a designated supervisor and for assessing whether it is appropriate for a designated supervisor, or prospective designated supervisor, to be approved, or continue in their role, if they are under investigation.

The policy will apply to all applications and issues that arise from the policy's implementation date.

The Chief Executive is accountable for the implementation of this policy.

Appendix – Criteria and assessment framework

The following requirements must be met in order for a registrant to be able to act as a designated supervisor:

- a. They are a registered pharmacist in Great Britain
- b. They have been registered for three years or more
- c. They have been practising in the sector, or a related sector², of pharmacy in which they wish to supervise
- d. They satisfy the assessment requirements if they are under investigation by us (there are no current fitness to practise issues, whether these are sanction(s) or condition(s) on their registration, that stops them from being a designated supervisor)

All four criteria are applicable at the application stage and if the prospective designated supervisor is under investigation then an assessment will take place. Where an issue arises during the training year, then only criteria D is applicable and an assessment will take place.

Criteria A and B, using information from the GPhC register, are straightforward to assess as to whether either, or both, are met. Criteria D, using information from fitness to practise records, is also relatively straightforward to establish whether it is met or not. However, if it is not met then an assessment must take place in order to ascertain whether the issue for which the designated supervisor (or prospective designated supervisor) is under investigation presents a significant risk to the registrant, the trainee and/or the GPhC and should result in the registrant being unable to act, or continue to act, in the capacity of a designated supervisor. This framework sets out the assessment.

Assessment

This assessment will be carried out by a two-person panel³ that will make a decision on whether the registrant in question is suitable to act, or continue to act, as a designated supervisor. The decision of the panel will be signed off by a senior manager. If the panel cannot agree on an outcome, then the senior manager will decide based on the evidence provided. There is no appeal mechanism; should new information come to light, or circumstances change, then a new application can be made.

When making decisions about suitability we are considering whether the current concern(s) mean it is not appropriate or safe for a registrant to act as, or continue acting as, a designated supervisor. The decision will be based on the following information:

- Details of concern(s)
- Any police reports if a caution or conviction occurred
- Relevant information held by the Professionals Regulation Team

All assessment decisions will be recorded for audit and quality assurance purposes.

² For instance, for those who wish to supervise a trainee pharmacist in general practice.

³ Staff from the GPhC Education and/or Registration teams

The assessment will take account of the seriousness of the offence/issue and assess the suitability of a registrant to supervise or continue to supervise. We will take into account the following when undertaking an assessment.

When we assess the evidence of conduct or behaviour, we consider:

- How serious it is
- How relevant it is to the practise of pharmacy
- How relevant it is to the integrity of the profession of pharmacy
- How recently the incident or incidents took place
- If the registrant has made any effort after the incident to rehabilitate themselves
- The registrant insight into their behaviour
- The registrant fitness to practise history

We consider the following conduct or behaviour to be serious⁴:

- Dishonesty, fraud, deceit or misrepresentation
- Drug or alcohol dependency
- Offences for which the registrant received a prison sentence
- A criminal caution or conviction
- A finding of misconduct or non-fitness to practise by any health or social care regulator
- Violence or exhibited intentional or deliberate disregard for human life
- Sexual misconduct
- Illegally supplying, or illegally manufacturing, any controlled drug
- Posed a threat to public health, safety or welfare
- Discrimination, for instance on the grounds of race, colour, religion or gender
- Blatant disregard for the law or the system of registration

Should a registrant have conditions⁵ applied to their registration at the time the application is submitted stating they must not work as a designated supervisor, or any condition that would have a significant impact on their ability to undertake the role of a designated supervisor, then the application will be rejected.

Outcomes

The panel will assess the circumstances and details of the concern(s) against the above and determine one of the following:

- Approve/reject the training arrangement

⁴ Likely to result in a rejection of application or cessation of arrangement

⁵ Included in **GPhC Conditions Bank**

- Continue/stop the training arrangement

Once fitness to practise proceedings are concluded and if the registrant in question has restrictions on their registration resulting in them being unable to fulfil the role of designated supervisor, a training arrangement will be stopped, regardless of the outcome of the original assessment.

Notification of Decision

Once a decision has been reached and if the designated supervisor has been judged unsuitable to continue, the trainee will be notified within 5 working days of the outcome. The letter will inform the trainee they need to find another designated supervisor. We will also contact the designated supervisor and notify the reasons for our decision.

In the rare circumstances that we cannot inform the trainee and/or designated supervisor that a training arrangement has been stopped as a result of a fitness to practise issue relating to the (potential) designated supervisor, then we will seek legal advice as to what can be disclosed in any communication. This will be dealt with on a case by case basis.

Table 1: Decision pathway

Decision point	Criteria/Assessment	Action/Outcome
1A	They are a registered pharmacist in Great Britain	Met – move to 1B
		Not Met – reject application
1B	They have been registered for three years or more	Met – move to 1C
		Not Met – reject application
1C	They have been practising in the sector, or a related sector, of pharmacy in which they wish to supervise	Met – move to 1D
		Not Met – reject application
1D	They satisfy the assessment requirements if they are under investigation by us	Not applicable – agree training arrangement
		Under investigation during the foundation training year or when the application was submitted – move on to 2
2	Assessment ⁶	Satisfied there are no concerns – agree/continue training arrangements
		Not satisfied, concerns exist – reject application/stop training arrangements

⁶ Move straight to assessment if issue arises during training period

Graph 2: Decision flow chart

