CUHOP response to the MAC call for evidence on the review of the Tier 2 Codes of Practice

The Council of University Heads of Pharmacy Schools (CUHOP) comprises the heads of UK schools of pharmacy which enrol students to read for a Master of Pharmacy (MPharm) degree with the expectation of registering as a pharmacist in the UK. CUHOP represents the collective interests and views of the Schools of Pharmacy looks to develop and articulate a vision for pharmacy education in the UK.

1. Could the current codes be simplified or streamlined and, if so, how?
No comment.

2. How often do the codes of practice need to be updated?
No comment.

3. With reference to the 25th and 50th percentile earnings listed in Table A.1 in the Annex to this document, what is the minimum appropriate pay (i.e. that will prevent undercutting of the resident labour force) for occupations on the NQF6+ list and/or for specific job titles within those occupations? Please specify the relevant 4-digit SOC 2010 code when submitting evidence.
We welcome the recognition in the call for evidence that sometimes the appropriate pay for a specific job title within a given Standard Occupation Classification (SOC) can vary significantly. We note that the 10th, 25th and 50th percentiles of the gross annual pay distribution for full-time pharmacists quoted in the call for evidence:

Code	4-digit SOC 2010 occupation	10th percentile (£)	25th percentile (£)	50th percentile (£)
2213	Pharmacists	19,990	29,644	38,315

Salaries for pharmacists vary according to the type and location of the employer as well as the level of experience and role of the employee. For example, the current code of practice identifies a minimum salary requirement of £20,710 for pre-registration pharmacists and entry level pharmacists; this is based on NHS pay banding (just less than starting salary for Band 5). It should be noted that three quarters of pharmacists do not work in the NHS and so relying entirely on NHS rates of pay for pharmacy is inappropriate. A previous attempt to describe an average salary for pharmacists based in the community in the code of practice resulted in hourly rates based on locum rates for qualified pharmacists and translated into very high annual salary. It is essential that any attempt to determine minimum salary requirements for pharmacists applying under Tier 2 takes into account the range of salaries for pharmacists working in different contexts and the different levels of experience/ roles.

4. Within the occupations on the NQF6+ list, are people typically employed at a lower salary because they are less experienced (for example, through recent graduate recruitment schemes, traineeships or apprenticeships) and are you aware of, or do you operate, specific schemes for recruitment and development of less experienced employees? Please provide details.
As heads of schools of pharmacy our main interest in the codes of practice for Tier 2 is the salary requirements for pharmacists, particularly pre-registration pharmacists (first year of employment/training following graduation) and early career pharmacists (first two or three years following registration). The closure of the post study work route in Tier 1 has meant

that to complete initial pharmacy training in the UK, in order to be eligible to apply for full registration with the General Pharmaceutical Council, the majority of our graduates who require a visa to remain and work in the UK are applying under Tier 2 and so are required to meet the minimum salary requirements. We appreciate that the purpose of setting a minimum pay requirement for occupations and job titles under Tier 2 is to prevent employers using migrants to undercut the pay of existing workers. However, we believe that UK Universities providing undergraduate pharmacy education to overseas have a moral obligation to help ensure that their graduates are allowed to complete their initial pharmacy training including the pre-registration year so that they are in a position to become fully qualified pharmacists. Furthermore pre-registration pharmacy trainees are supernumerary, with employers receiving grants from the government to help cover the costs of employing and training each pre-registration trainee. It is important that graduates from UK schools of pharmacy are not be prohibited from receiving this essential training because they are unable to find a pre-registration post that can afford to meet the minimum salary requirement.

The NHS National Recruitment Scheme (NRS) is a centralised system for the recruitment of pharmacy graduates from all UK schools of pharmacy into NHS pre-registration trainee pharmacist posts in Hospitals in England & Wales (except Bradford Sandwich students). A similar scheme, the Pre-Registration Pharmacist Scheme (PRPS) is provided by NHS Education Scotland for recruitment into hospital pre-registration places in Scotland. Hospital pre-registration trainee pharmacists are paid according to salary Band 5 on the nationally agreed NHS salary scale. This means that in April 2011 the basic salary for a pre-registration trainee pharmacist in the NHS was £21,176 per year (additional high cost area allowance payable in inner London, outer London and South East England apply).

Unlike NHS hospital based pre-registration posts recruitment for pre-registration places in the community is not centralised as it involves a large number of employers. However, large multiples like *Boots The Chemist Ltd* do recruit pre-registration pharmacists across the UK and Ireland (http://www.boots.jobs/preregistration/index.php). Salaries for pre-registration pharmacists (as with other pharmacy roles) employed to work in the community vary, and can be markedly lower than the NHS Band 5 salary. For example two pharmacies in Sidcup and Hackney are currently looking to recruit pre-registration pharmacists on a salary of £18,500. Furthermore, recent data collected from Pharmacy graduates to inform the national Destination of Leavers from Higher Education survey supports the understanding that the average salary for pre-registration posts in the community is close to £18,000 with a proportion of pre-registration trainees being paid less that £18,000. Unfortunately it is not possible to extract course level graduate salary data from the national data HESA hold from this survey, however data collected by one school of pharmacy on its 2009/10 graduates is included as an appendix to this response.

For newly qualified pharmacists, or ‘entry level pharmacists’ as they are currently described in the current code of practice, working in NHS Hospitals can currently receive a salary of up to £27,625 (top end of Band 5). Salaries for newly qualified pharmacists working in community again vary significantly according to location and type of employer, with newly qualified pharmacists at the larger multiples being able to command higher salaries than smaller multiples and independent providers. The Royal Pharmaceutical Society estimates that the starting salary for a newly qualified pharmacist is currently between £20,000 and £30,000 http://www.rpharms.com/about-pharmacy/careers-in-pharmacy.asp .

We strongly recommend that a separate and lower minimum salary requirement is assigned to pre-registration and early career pharmacists, to distinguish them from more experienced pharmacists who are able to command higher salaries.

5. What are the typical characteristics, or range of characteristics, of these less experienced employees? For instance, what qualifications do they hold, how old do they tend to be, how many years has it been since they graduated, how many years experience have they had in the industry?

Pre-registration pharmacists are those who have just graduated but are yet to achieve registration with the General Pharmaceutical Council (GPhC); whilst they receive a salary they are still receiving initial pharmacy training required in order to become a fully qualified pharmacist. A pharmacist can be typically understood to be newly qualified two to three years following achieving registration with the GPhC.

6. With reference to the potential 10th percentile of the pay distribution for occupations listed in Table A.1, what are the appropriate minimum pay thresholds for low experience workers to prevent undercutting for occupations on the NQF6+ list and/or for specific job titles within these occupations? Please specify the relevant 4-digit SOC 2010 code when submitting evidence. Please also explain how you identify low experience workers.

We believe that there are two groups of pharmacists that need to be identified as separate within the code (2213) and be assigned their own minimum salary requirement. The first being pre-registration pharmacists (both NHS and community) and the second should be early career/ newly qualified pharmacists, qualified pharmacists in their first three years following graduation.

The current average salary for pre-registration pharmacists in NHS hospitals is approximately £8,000 less that the 25th percentile (£29,644) quoted for pharmacists. The average salary for pre-registration pharmacists in the community is approximately £10,000 less that the 25th percentile (£29,644) and around £2,000 less than the 10th percentile (£19,990) quoted for pharmacists. To accommodate the lower salaries for pre-registration pharmacy posts, taking into consideration that the pre-registration year is supernumerary and an essential part of initial pharmacy training, we recommend that under pharmacy (2213); the minimum salary requirement for pre-registration pharmacists should be less than the quoted 10th percentile of £19,990. We would suggest that an appropriate minimum salary for this group would be £17,000.

Based on the understanding that salaries for newly qualified pharmacists in NHS hospitals and in the community are between £20,000 and £30,000. For newly qualified pharmacists we would suggest that the 25th percentile of £29,644 is too high, and that a figure closer to the 10th percentile of £19,990 would be more appropriate for a minimum salary requirement for newly qualified/ early career pharmacists.

7. What has been the impact on you of the requirements in the current codes of practice with regard to advertising locations (in addition to advertising in Jobcentre Plus) on recruitment? If you are an employer, has adhering to the requirements led to you recruiting from the resident workforce? If not, why not?

N/A

8. Where would you expect to see advertisements for vacancies in your occupation?

For hospital posts the afore mentioned pre-registration schemes have information about recruitment online (http://www.pharmalife.co.uk/ and http://www.nes.scot.nhs.uk/education-and-training/by-discipline/pharmacy/pre-registration-pharmacist-scheme.aspx), and vacancies for qualified pharmacists are advertised on NHS Jobs: http://www.jobs.nhs.uk/.

Pre-registration and qualified pharmacy posts in the community and jobs for pharmacists in industry and academia are advertised on employer websites and on a number of specialist journals and recruitment websites: http://www.chemistanddruggistjobs.co.uk/jobs/pre-reg-pharmacist/ and http://www.pjcareers.com/

9. What factors do, or should, employers take into account when considering which advertising locations to use for recruitment into jobs which could ultimately be filled by non-EEA migrants?
No comment.

Appendix 1

Illustrative salaries for pre-registration trainees in hospital and community settings, winter 2010-11.

Data collected from MPharm graduates by a single university

95 MPharm (Hons) Pharmacy graduates were employed within a pharmacy six months after graduating. Of these, 72 declared their salary (75.8%).

Hospital Pharmacies

Employer	Salary
Graduate 1	£20,000
Graduate 2	£22,000
Graduate 3	£21,000
Graduate 4	£25,000
Graduate 5	£25,000
Graduate 6	£21,000
Graduate 7	£23,000
Graduate 8	£22,000
Graduate 9	£21,000
Graduate 10	£23,000
Graduate 11	£21,000
Graduate 12	£21,000
Graduate 13	£21,000
Graduate 14	£22,000
Graduate 15	£21,000
Graduate 16	£21,000
Graduate 17	£21,000
Graduate 18	£24,000
Graduate 19	£24,000
Graduate 20	£21,000
Graduate 21	£21,000
Graduate 22	£22,000
Graduate 23	£21,000
Graduate 24	£21,000
Average Salary	**£21,957**
Mode Salary	**£21,000**
Minimum Salary	**£21,000**
Maximum Salary	**£25,000**

Community Pharmacies

Employer	Salary
Graduate 25	£16,000
Graduate 26	£18,000
Graduate 27	£18,000
Graduate 28	£18,000
Graduate 29	£18,000
Graduate 30	£18,000
Graduate 31	£18,000
Graduate 32	£18,000
Graduate 33	£18,000
Graduate 34	£18,000
Graduate 35	£18,000
Graduate 36	£18,000
Graduate 37	£18,500
Graduate 38	£18,500
Graduate 39	£18,500
Graduate 40	£19,000
Graduate 41	£19,000
Graduate 42	£19,000
Graduate 43	£19,000
Graduate 44	£19,000
Graduate 45	£19,000
Graduate 46	£18,500
Graduate 47	£18,500
Graduate 48	£18,500
Graduate 49	£18,000
Graduate 50	£18,440
Graduate 51	£18,500
Graduate 52	£18,000
Graduate 53	£18,000
Graduate 54	£18,000
Graduate 55	£18,000
Graduate 56	£18,000
Graduate 57	£18,000
Graduate 58	£18,000
Graduate 59	£18,000
Graduate 60	£18,000
Graduate 61	£20,000
Graduate 62	£18,000
Graduate 63	£17,000
Graduate 64	£18,000
Graduate 65	£17,500
Graduate 66	£16,750
Graduate 67	£18,500

Graduate 68	£15,000
Graduate 69	£18,000
Graduate 70	£18,000
Graduate 71	£18,000
Graduate 72	£18,000
Average Salary	**£17,900**
Mode Salary	**£18,000**
Minimum Salary	**£15,000**
Maximum Salary	**£20,000**