

VERITA

Registration Assessment - Assurance Report

An executive summary for
General Pharmaceutical Council

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Executive summary and recommendations

Introduction

1. The General Pharmaceutical Council ('GPhC' or 'the Council') is the independent pharmacy regulator in Great Britain. As part of that role it sets the standards for the registration of pharmacy professionals, including assessing whether new candidates have reached the required level for admission to the register. Issues arose with the registration assessment for pharmacists held on 29 June 2022. Some of these resulted in significant delays to candidates. Verita is an independent organisation that specialises in investigations, reviews and inquiries. GPhC asked Verita to carry out an investigation into what happened on 29 June and the underlying causes of the issues that arose.

2. Verita were provided with a large amount of documentation from people at GPhC and from staff at BTL (the company that ran the exams on behalf of GPhC). Key documents included:

- Papers relating to the tender process leading to the appointment of BTL
- GPhC policies, risk registers, reviews of 29 June, and Council papers
- Incidents reports produced by BTL
- The results of a survey of candidates.

3. We carried out a total of 21 interviews, including staff from:

- General Pharmaceutical Council
- The Board of Assessors (who oversee the standard and integrity of the assessment)
- BTL
- AlphaPlus (who advise GPhC on setting the standard for their assessments)
- TeamCo (a supplier to BTL which specialises in providing pop-up venues for exams).

The registration assessment before 2022

4. GPhC have traditionally run two assessment sittings a year, one in June and the other in the autumn. Approximately 3,000 candidates take the exam in June, with a further 1,000 in the autumn. Since its creation in 2010 up to 2019 the GPhC ran registration assessments that were paper-based, with candidates attending a supervised location to take the exam. The registration assessments run by the GPhC have therefore evolved significantly in the last few years:

- 2019 - last use of paper-based exams
- 2020 - no exams due to Covid pandemic
- 2021 - on-line exams run by Pearson Vue
- 2022 - on-line exam run by BTL.

5. Registration exams in 2021 and 2022 required candidates to attend locations where they were provided with computers running examination software. The places where exams are held can be divided into two main types of location:

- Permanent (which are used continuously for exams by a particular supplier)
- Non-permanent, or 'pop-up' (which range from venues like the Excel Centre in London or the NEC in Birmingham, to conference rooms in hotels).

The 2021 exams

6. Following the cancellation of exams in 2020 due to the Covid lockdown, GPhC appointed Pearson Vue to run the assessment in 2021. Pearson Vue is a global company with 4,500 employees and test centres in 180 countries. The exams were run using an on-line system in a combination of permanent test centres owned by Pearson Vue and permanent test centres owned by third-party suppliers (such as Kaplan and Pitman). No pop-up locations were used.

7. There were a number of incidents during the six sittings that Pearson Vue delivered. Some candidates had delayed starts to either (or both) papers, and some suffered delays during the papers. Some of these incidents lasted for an hour or more and three candidates were unable to complete the exam.

8. GPhC said that the key lessons they learnt from 2021 were that the capacity of test centres is an important issue - particularly with social distancing under Covid. They decided that multiple sittings, and re-using questions from past exam papers, was not possible, and so going forward the registration assessments needed to be held on one day, with two sittings each year. Therefore, ensuring that there was capacity for 3,000 people to be able to sit the exam at a single time in June 2022 was identified as a priority.

Tendering process

9. Because of the pandemic, Pearson Vue were appointed to deliver the assessment in 2021 on an emergency basis via an accelerated competitive tender process. In Spring 2021 it was decided that the GPhC would go through a full procurement exercise for a supplier to deliver the exams from 2022 to autumn 2024. The procurement process began in summer 2021 with the tender being issued in July. The contract was ultimately awarded to BTL, using their Surpass software. Formal award took place in January 2022.

10. GPhC staff told us that the specification in the tender documentation was deliberately expressed in general terms. They said that GPhC lacked experience in running on-line exams, and that input from suppliers on how the exams should be run was particularly important. In particular, the number of test centres was left to the supplier to recommend.

11. It is clear from the tender documentation that two issues were prioritised by GPhC:

- the desirability of having a single exam on a single day starting at the same time
- minimising travel for candidates (partly based on a concern that Covid restrictions might need to be reintroduced).

12. These priorities, together with the short amount of time between the awarding the contract in January and the first assessment in June, made it inevitable that a large number of venues, including several small 'pop-up' ones, would be needed. That approach clearly involved a different set of risks than previous approaches that GPhC had followed. We accept that the use of small locations was in part driven by the development of the Covid pandemic, which at the time of planning the 29 June exams was impossible to predict.

However, we have not seen evidence of a systematic appraisal and evaluation of the risks from different approaches being carried out before the award of the contract. Such planning would have been helpful.

Preparation for 29 June

13. BTL were formally appointed in January 2022. Staff in both GPhC and BTL were aware that starting work on the June assessment in January gave a very tight timescale. Some in GPhC felt that the time available was too short. Not beginning the process of working with BTL until January 2022 certainly made the task of all those involved more challenging.

Project management

14. Both BTL and GPhC staff told us that GPhC's requirements for the exams were clear. We have not seen anything to suggest that any lack of clarity about what GPhC needed played a role in the issues that eventually transpired on 29 June.

15. Nevertheless, an ideal project structure would be to have a single project plan, with a project board chaired by a senior member of GPhC. Ideally the meetings would be minuted with decisions recorded and circulated to members. We are not clear that all these elements were present in the run up to June 2022.

16. Almost all meetings were held virtually. This is in-line with GPhC's 'virtual first' policy. Good communication between the education and delivery teams is vital if exams are to be run smoothly. Some people have suggested that a greater use of face-to-face meetings would facilitate this.

The exam booking process

17. The booking process for the June exams opened in May 2022. There were a number of problems with the booking system, which resulted in the booking system being shut down and reopened the following day. GPhC told us that the problems arose from the system not

being tested fully. However, they said that BTL were very engaged with the issues and sorted things out quickly. GPhC staff said that they were aware of the impact the problems had on candidates and wanted to ensure they did not recur. However, they felt that the problems in themselves did not seem too concerning at the time in terms of their impact on the assessment as a whole. A different approach to exam booking was adopted for the November 2022 exams with candidates being allocated venues and only needing to go onto the system if they wanted to change the venue that they had been given. We understand that this process has so far gone off without incident.

June 2022 assessment

18. A total of 113 venues were used to carry out the registration assessment on 29 June:

- 82 venues were permanent, dedicated training venues
- 31 were pop-up centres.

19. The permanent venues are part of a network of suppliers that are used by BTL. The pop-up venues were put together by TeamCo, a company which specialises in providing such venues for exams.

20. Out of the 113 centres, at least one candidate in 32 centres had a delay of over 30 minutes in starting their assessment. In five centres all the candidates were delayed over 30 minutes. Four out of these five venues were run by TeamCo. In total, across all the centres, 301 candidates were delayed by over 30 minutes. That represents 11 per cent of the 2,722 candidates sitting the assessment on 29 June.

21. The problems that arose can be summarised under the following headings:

- Set-up
- Technology
- Invigilation
- Other issues

Set-up

22. Both GPhC and BTL told us that they were clear that it was a requirement that exam venues be set up the night before. However, this was not the case in three venues where delay was caused to candidates.

23. TeamCo told us that they were less clear that setting up the night before was a requirement provided that laptops were set up before the time the exam was due to start. They told us that while they aimed to set up the night before, in cases such as Nottingham where this was not possible (because the equipment was not delivered the day before), they believed that there was sufficient time to set things up in the morning. TeamCo told us that they are now clear that the requirement is that all venues must be set up the day before, and that they will provide evidence to BTL to prove that the set-up has been carried out.

24. The experience of Nottingham, where the worst problems occurred, illustrates that problems are often the result of a combination of things going wrong - in that case human error (in that the equipment was erroneously delivered to another venue) combined with staff sickness. While there was in theory time to set up the venue if work started at 6am on the day of the exam, this left the system vulnerable to other, unconnected, problems that arose. Human error and sickness can never be eliminated from a process, but they can be planned for. Ensuring venues are set up the day before is an appropriate response to such risks. Actions have now been taken to ensure that this practice is embedded.

25. The Nottingham experience also highlights the importance of communication. Although staff in TeamCo knew that the equipment was not available by the time that they went home on 28 June, this information was not passed on. That meant that the decision on how to proceed was taken by people who had less understanding of the importance of the exam and the constraints on it than if the information about the equipment had been passed to BTL or GPhC.

Technology

26. Even where all the equipment was available, it was not possible to start the exam on time in some locations. These issues arose from combinations of IT issues and human error.

27. It had been agreed between GPhC and BTL that all exams should be downloaded on to laptops before the exam day. BTL said that this was done in all cases (for pop-up venues the exams were downloaded to TeamCo laptops before dispatch to the exam locations). However, a number of the error reports compiled by BTL talk about delays caused by the difficulty of downloading the exam on 29 June. In some cases, it might be that attempts to download the exam onto a computer which already had the exam on it was the actual cause of some of the problems that arose. These experiences are examples of the problems that can occur at the interface between people and computers. If time was spent trying to download an exam that was already on the computer, the issue is really one of communication or human error, rather than the technology.

28. In a number of locations there were problems with logging into the exam, which required codes to be inputted. We were told that many of these arose from simple human error (by candidates or invigilators), such as using a zero rather than the letter 'O'.

29. There were wi-fi issues at six centres. BTL's incident report details a number of these in the context of difficulties in downloading or starting the exam on the day. However, BTL confirmed that as the exam was downloaded onto all the computers in advance, wi-fi was not needed to start the exam. The reports of wi-fi issues delaying the exam therefore indicate a lack of training for invigilators. BTL also confirmed that if wi-fi is not available at the time a candidate finishes the exam, the software will simply store the data until a connection to wi-fi can be made. While it is unsurprising that candidates completing an exam would be anxious if they receive an "error" message saying that their results had not been uploaded, the correct advice would have been to tell them that this was not a problem as their results would be stored on the computer and uploaded when wi-fi did become available.

30. The example of wi-fi illustrates how problems with technology, training of invigilators and expectations of users interact. Solution must therefore contain all of these elements.

Invigilation

31. The quality of invigilation is important to the success of exams. As well as the issues relating to technology, incident reports suggest that there were questions about whether all invigilators were familiar with GPhC's assessment requirements. In addition, some concerns were raised by candidates about the professionalism and behaviour of invigilators.

32. As well as ensuring that exams are conducted in the right conditions, the role of invigilators is important if things go wrong - or are perceived to go wrong. Therefore, invigilators should have knowledge of both GPhC assessments and exams more generally, as well as be able to respond well to whatever problems arise on the day. Ensuring that invigilators are of sufficient quality to cover all these areas is clearly challenging. It suggests that focussing on a smaller number of large venues might be helpful as the knowledge required can then be shared amongst invigilators who can specialise in one area of the task.

Root cause analysis

33. We have analysed the issues that lie behind the problems that arose on 29 June. These can be summarised as follows:

- Change of exam system from paper-based to on-line exams - many of the issues that arise with on-line exams are different from paper-based exams and there was less expertise within GPhC in using an on-line system. Problems on 29 June were therefore harder for GPhC to anticipate (as they had less experience) and therefore mitigate. The quality of the immediate response was less good than it would have been had invigilators had more experience.
- Change of supplier - BTL were not appointed until January 2022. All parties agree that this was a very short timescale to implement the project and prepare for the June 2022 assessment. There was a learning curve for BTL to ascertain and understand GPhC's requirements and pass them on to their own sub-contractors.
- Decisions taken by GPhC about the assessment format - GPhC requires that all candidates must start exams at the same time on the same day. No provider has sufficient spaces to cater for all candidates at permanent venues, meaning that

some pop-up venues are needed. A larger number of venues is harder to manage and ensure consistent quality.

- Covid pandemic - Covid impacted on the 29 June exams in a number of ways. It made an immediate change to on-line exams necessary, meaning that the transition happened in a less planned way than would have occurred had the timing been within GPhC's control. Covid had an impact on the delivery of the assessment, with local centres used to minimise the need for candidates to travel in case travel restrictions were imposed. Finally, Covid illness amongst invigilators meant that in some locations people with less experience or insufficient training were used.
- Communication issues - Communication between BTL and its sub-contractor, TeamCo, should have been clearer about the level of preparation required for the exams and about issues relating to set-up. The lack of clear communication to BTL and GPhC about the problems as they arose was an issue that exacerbated the uncertainty and anxiety for candidates waiting to start the assessment and meant that neither the GPhC nor BTL were in a position to take action or make informed decisions about next steps.
- Strategy and project management - GPhC staff told us that at times they were so focussed on delivery, there was insufficient time to take a more strategic approach. We also heard that there could have been more project management support for staff who were running the exams. The decision by the Director of Education and Standards to appoint a Registration Assessment Programme Manager should help with this. An important factor that sits behind all these decisions is that of financial cost. The Council's funding comes from the profession and it has a responsibility to ensure that funds are used as carefully as possible. Decisions about what to spend internally on the management of exams and on the contractors that deliver the assessment are therefore taken with this in mind.

Analysis of underlying causes

34. There is a learning curve involved in moving from one form of exam to another. In the circumstances, GPhC had little alternative but to make this change. The change of supplier from Pearson Vue in 2021 to BTL in 2022 added further risk, particularly given the short time that GPhC had with the new supplier. Based on what GPhC knew at the time,

however, it would not be fair to criticise them for appointing a new supplier following a procurement process.

35. The model of using a large number of small venues made the problems that arose more likely (although the vast majority of problems occurred at pop-up centres). We understand why GPhC made this choice, which it did in the best interests of candidates, but we believe that doing so increased the risk of problems occurring.

36. The Covid pandemic was an important element of the problems that arose with the exams on 29 June. It is likely that GPhC would always have changed to delivering exams on-line at some point, and problems may have arisen in doing so. However, the requirement to do this quickly made it more likely that there would be problems.

37. Ideally GPhC would have taken time after the 2021 exams to think through their strategy for exams, to fully examine the risks of different options and to make the necessary trade-offs. The constraints placed on them - notably the public interest in not delaying when candidates were able to join the register - made this difficult. However, it will be important to learn this lesson in future.

38. For most of the decisions discussed here, GPhC did the best it could in difficult circumstances. Looking back at the run-up to the June assessment, however, the risk of significant problems was high. The multiple risks of a new system, a new supplier and Covid uncertainties added up to a very difficult context. It would have been better if GPhC was able to manage expectations across the board - internally, with its suppliers and for the candidates - to raise awareness that things could go wrong and that they had a plan if they did.

Reaction from GPhC following the exam

39. GPhC took a number of steps in response to the issues on 29 June to address the problems experienced by candidates. There is clearly a balance to strike between being seen to be empathetic and responsive, and not making decisions that could cause problems in the future. There is a danger of a loss of confidence if GPhC looks like it is making up its response as it goes along. Ideally, GPhC should consider its response to delays and other problems in advance of exams being held and publish its approach so it can point to the

implementation of policy as it acts. Managing expectations is key. GPhC should adopt an approach where it is acting in a considered, strategic way, and seen to be acting in that way, communicating as early and as fully as possible.

Assessment in November 2022

40. The key difference between the November and June exams is the smaller number of candidates in November - around 1,000 instead of the 3,000 seen in June. That smaller number can be handled within BTL's permanent test centre network without the need for pop-up centres. On that basis, most people we spoke to in both organisations are confident that the problems that occurred in June will not recur.

41. GPhC staff told us about other steps that have been taken to ensure that the exams go smoothly. They say that they have had extensive meetings with BTL (both face-to-face and on-line) to address the issues that arose in June and to agree protocols on what needs to be done for November. Specific measures include:

- an audit of the centres that will be used before the exam to ensure they meet BTL's minimum specification for test centres
- measures to ensure that venues are set up the night before the exam
- additional invigilation training by BTL and by GPhC
- improved arrangements for escalation of issues that arise.

42. It is proposed to have GPhC staff on site at each venue during the November exams. We have some concerns about that idea, in particular whether there will be confusion about their role. We believe that training can resolve these concerns to ensure that those attending from GPhC are clear that:

- The role of GPhC staff is to observe, not to get involved in problem resolution or decision-making
- GPhC staff are not responsible for the conduct of the assessment and will not be criticised for not intervening in the way a test centre is run
- The correct line of communication for those running test centres is to report issues to BTL, with escalation to GPhC as necessary.

Assessment in June 2023 and beyond

43. The exams in June 2023 will involve a much larger number of candidates than those in November 2022. That number cannot currently be accommodated in permanent venues. Therefore, GPhC must either:

- Use some kind of non-permanent/pop-up venue(s); or
- Have more exam dates so there are fewer candidates at the sitting.

44. It is likely that some pop-up venues will be needed for the June 2023 exams. While having a large number of venues increases accessibility for candidates, the risks of using a large number of small venues (and pop-up venues in particular) is, by now, obvious. Even without the benefit of hindsight, using many venues seems inherently risky because progress is hard to monitor, it is difficult to ensure consistency, and it is not possible to have experts available at a large number of venues if technology issues arise. Using small, but better, locations is an option worth considering. The possibility of using university buildings was mentioned to us as being under consideration.

45. In order to protect the integrity of the exam, papers can only be used once, unless questions from older papers are re-used (which itself poses challenges). It follows that all students taking a particular exam must begin it at the same time to avoid any risk that exam questions might be shared.

46. The GPhC has traditionally run the exams on the basis of two sittings a year. It would be possible to increase this number slightly to maybe three or four exam sittings each year. Increasing the number of exams would require additional resources within GPhC to set questions, manage marking and set the pass rate. It would also be necessary to ensure that a sufficient number of candidates took each test in order to validate the standard. GPhC may like to examine whether adding an additional exam would be viable as a way of avoiding the need for pop-up venues.

47. Ultimately the choice of strategy involves trade-offs. If GPhC's main priority is minimising the distance that candidates have to travel, a larger number of venues will be needed. Given that the integrity and successful operation of the assessment is the overriding priority however, using a smaller number of large venues does appear attractive.

48. Good project management minimises the number of things that go wrong. Problems will always arise, however. Mitigations of various kinds can be put in place for these risks, including requiring a 10 per cent contingency in the number of laptops available at each venue (which is BTL's standard approach). The establishment of a Quality and Performance Assurance Committee provides oversight of the process at a senior level.

49. In making decisions about what approach to take when things go wrong there are no easy solutions, only trade-offs. What GPhC can do, however, is to be clear about possible risks and plan for different eventualities. They should set out clearly for candidates what actions they will take if problems arise. The management of expectations is again key.

Conclusions and recommendations

50. There is naturally an immediate focus on the exams in November 2022. While there is inevitably a degree of nervousness amongst those we spoke to, most people are as confident as they can be that the right measures have been put in place to allow the exams to go as well as possible. We share that view. A key element is that the November exams are small enough that they can be accommodated within BTL's permanent venues. While there can always be unexpected events (such as weather or transport related interruptions) and IT issues, we believe that the right mitigations have been put in place.

51. One of the mitigations proposed for November is to have GPhC staff present at each exam location. As we have set out, we think that it will be essential for everyone involved to be clear of the roles that those representatives take.

Recommendation

R1 GPhC should make it a priority to ensure that representatives of the organisation who attend the exams are correctly trained, including being fully briefed about the extent of their role and the correct chain of command.

52. We note that it takes time to embed new processes and develop a partnership between the two organisations. The relationship between the GPhC and BTL is good and should be developed with a longer-term focus.

53. Many people we spoke to have more concerns about the exams in June 2023 than November. We believe that concern is justified. We were told that some large venues are booked up for two years in advance. GPhC is therefore unlikely to have a free hand in where the exams can be held.

54. Important decisions still need to be taken about how the exams will be run in June. While it is understandable that the current focus is on November, it will be increasingly important to turn attention to those decisions. The following comments aim to help that process.

Strategic approach and risk profile

55. As we have set out in this report, the choices that GPhC faces in deciding its approach to exams is best seen as a series of trade-offs. There is a need to balance a number of factors:

- Ensuring the integrity of the exams, notably that candidates have a uniform experience and the need for it all to happen on a single day
- Candidate satisfaction with the process, including the distance that they have to travel
- The financial cost of the process
- The organisation's risk appetite.

56. There is no single correct way of running the assessment. Staff in GPhC, together with the Board of Assessors should set out the options and their implications - including risk profiles - so that Council can make explicit decisions about the right approach to take.

57. These events give GPhC the opportunity to reflect more strategically on the exam process. We understand that, in the longer term, consideration is being given to whether the assessment in its current form is the best method of assessing capability. When decisions

are taken about new models it will again be important to be explicit about the choices and risks involved.

Recommendation

R2 The GPhC should set out the trade-offs and risks involved in deciding the approach taken to the registration assessment as clearly as possible to ensure that decisions are taken through GPhC's governance structures.

Project management

58. The registration exams, particularly those in June, are a large and complex project. Ensuring that the project is run as effectively as possible is important to their long run success. We welcome the appointment of a programme manager to support delivery in the future.

Improved communication

59. Once GPhC is clear of its strategy, it is important to ensure that the strategy is fully communicated both within the organisation, to BTL and beyond. Within GPhC the interface between the operations and education teams (and through them to the Board of Assessors) is particularly important. The change of format from paper to on-line means that the dividing line between the two teams is less clear.

60. We note that there are good relationships between staff in GPhC and BTL and both sides believe that the people involved in exam delivery are focussed on problem solving. That is healthy and should pay dividends in the long term.

Recommendation

R3 GPhC should ensure that communication both within the organisation, with candidates and suppliers is as effective as possible.

Invigilators

61. The importance of good quality invigilators emerges clearly from our work. GPhC lost a lot of corporate experience when the change to on-line examinations occurred. Consideration should be given to how the capability of invigilators can be built up or supplemented with additional resources.

Recommendation

R4 GPhC should consider how the strength of the invigilation function can be maximised.

Managing expectations

62. Whatever decisions GPhC takes about how to move forward, managing expectations, particularly amongst students, should be prioritised. Issues will always arise in a project as complex as these exams. GPhC must retain the confidence of candidates by showing that when things do go wrong it has thought through the issues and has a plan as to how it will react. The exam process is an understandably stressful one for students and giving them greater certainty before the exam will help to reduce any hardship that they experience.

Learning with others

63. GPhC is not alone in the challenges it faces of running high stakes exams. In July candidates sitting the Solicitors Qualifying Exam for the Solicitors Regulation Authority (SRA) were not able to sit the exam despite waiting over five hours for it to start. All that has been said publicly is that this was the result of an “*IT issue*”. While there may be legal reasons that the SRA does not want to say more, it would be sensible for GPhC to share experiences in private with organisations such as the SRA.

Recommendation

R5 Consideration should be given to GPhC initiating some kind of forum for shared learning about exams between regulatory organisations.