



# Consultation Report:

## Consultation on proposed Rules to amend the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) Rules 2014

Version 1

1 April 2020

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## Introduction

This report summarises the feedback received during the short public consultation (26-31 March 2020) process on the proposed Rules to amend the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) Rules 2014

## Background

The PSI decided to propose changes to the existing statutory rules which set out the education and training requirements for the five-year integrated Masters degree in pharmacy (MPharm). This was done as a part of current initiatives to meet potential and real challenges arising in the context of the COVID-19 emergency for individual students.

The PSI along with other regulatory and public bodies has had to examine how it carries out its regulatory functions during this unprecedented time. It has been and will be necessary to make changes to deal with real and potential challenges that are evolving and arising.

Under the current PSI (Education and Training) (Integrated Course) Rules 2014, a student must undertake an eight consecutive month patient facing experiential learning placement in their fifth year to be completed as part of the MPharm.

In the context of the current Covid-pandemic, the PSI proposed an amendment to the Rules that will reduce the legislative requirement for placement to be a period of six months in exceptional circumstances and within the period of eight consecutive months provided for in the higher education institutions' calendar. The amendment would apply to students who commenced their fifth year placement prior to 1 March 2020.

The amendment was proposed to mitigate circumstances that may reasonably arise for individual students in light of the exceptional circumstances presenting during the COVID-19 emergency. Those circumstances may include:

- a student, a preceptor, or both, being required to self-isolate, self-quarantine, or because of illness being unable to continue in their placement, or
- where a pharmacy may have to close for a defined period of time, which will impact the experiential learning placement.

If a student is not in a position to meet the current requirements of the legislation it would impact their ability to register as a pharmacist.

The proposed Rules to amend the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) Rules 2014 were presented to Council at its meeting on 26 March 2020. The Council approved the proposed Rules for public consultation.

This is the report on the outcomes of the consultation process.

## About the consultation

The public consultation opened on 26 March 2020 and closed on 31 March 2020.

The consultation was notified to PSI registrants in a COVID-19 email update, and notified more broadly on the PSI website and through social media.

Thirteen targeted stakeholders (see Appendix A) were made aware of the consultation through email. The targeted stakeholders were chosen as they were deemed to be particularly affected by, or would have competencies of relevance for, the proposed changes.

## Response to the consultation

In total **n=22** responses were received to the public consultation. The majority (86%) of the respondents agreed with the proposed change to the statutory rules. Comments and suggestions received are responded to in the table below.

## Targeted stakeholder consultation

Of the 13 targeted stakeholders emailed, seven responded to the consultation. All seven respondents agreed with the proposed changes to the statutory rules. The following proposals were put forward by targeted stakeholders:

- It was suggested that the decision to reduce the length of the placement in individual cases would be at the discretion of the recognised institution
- It was suggested to clarify the draft legislative text to specify the duration of the special circumstances, where the provision will be in use, and to put in place monitoring/review of the duration.

Comments and suggestions received are responded to in the table below.

## PSI Response to comments and suggestions

	Responses to consultation	PSI Comment
1	Overall, I think it is a pragmatic approach to the current situation. I understand from the legislation that the student will not have to make up for any lost placement time that is less than 8 months but greater than 6 months in the MPharm year? How would this arrangement affect the online modules that MPharm students also undertake	<p>The amended legislation is to accommodate students in exceptional circumstances only where a student may be affected by the COVID-19 pandemic.</p> <p>The pharmacy students will have to engage with all learning requirements as laid down by the Higher Education Institutions (HEI), and once the student</p>

	with the HEI they are registered with? Are they still obliged to undertake their inline modules should this piece of legislation be of relevance to their placement? How might that affect their subsequent registration as a pharmacist? If they are not on active placement, presumably they should still be engaged with their online modules, no matter when such a break in their practice placement occurs? Does this potential shorter placement still comply with EU legislation in terms of requirement for practice placements?	<p>is awarded an MPharm i.e. the qualification appropriate for practice under Section 16 s/he will be in a position to apply for registration.</p> <p>The Professional Qualifications Directive 2005/36/EC as amended requires that a period of six months of experiential training be undertaken during or at the end of the theoretical and practical training. The details of the training required are laid out in Article 44 of the Directive.</p>
2	I fully support the proposed amendment to reduce the legislative requirement to help us deal with the various pressures and changing circumstances and demands that the current situation is presenting	Noted.
3	Thank you for the opportunity to contribute to this consultation. The proposed amendment seems sensible in the current situation.	Noted.
4	In view of these unprecedented times, I welcome the proposed changes in legislation to allow our current MPharm students to graduate on time this year. It is a sensible and necessary measure to implement.	Noted.
5	We've reviewed your draft Rules and think it is an excellent idea.	Noted
6	I would like to say that I am fully in favour of this proposed amendment and the ability of our current MPharm candidates to help patients, public and society as a whole. This is a necessary and important change that should be made for the common good.	Noted.
7	I am a senior preceptor this year. I agree with the amendment.	Noted.
8	I am very worried about my student's exposure to Covid... I'd prefer her to use more of the time in a safe place preparing a thesis, and for her not to need to do "extra hours" to make up for time lost, thereby INCREASING risk to her	<p>Noted.</p> <p>The Professional Qualifications Directive 2005/36/EC as amended requires that a period of six months of experiential training be undertaken during or at the end of the theoretical and practical</p>

	<p>which is my current interpretation of the change in appel's rules. I think ALL mPharm students are at high risk, at this, the beginning of their career, and should be afforded the utmost protection, therefore all should be assumed to be exposed to exceptional Covid circumstances..in both Community and Hospital Pharmacy, whatever about the others of which i have little experience. I would Much prefer a 6 month period, with a "supervised essay/thesis" making up for "lost" time for all.. I'm copying this to XXX, our Intern, to see if she wants to comment too.In the current horrific maelstrom of Covis she has had a very torrid time, and my contribution to her learning has been downright awful.</p>	<p>training. The details of the training required are laid out in Article 44 of the Directive. The proposed amendment is to allow for exceptional circumstances that may arise whereby an individual student is not in a position to complete the required consecutive eight month experiential placement and facilitates recognition of a six months period.</p> <p>The Professional Qualifications Directive requires that a student completes a minimum of six months traineeship in a pharmacy which is open to the public or in a hospital under the supervision of that hospital's pharmaceutical department.</p>
9	<p>Firstly, I have to commend all involved in the proposal of the new draft and as a student it's comforting to know our welfare is prioritised considering the uncertain circumstances that are existing.I agree to the new proposal currently being drafted in regards to the length of the placement a student must undergo. However, if accepted by Pre-registration preceptors and by the public welfare I would suggest proposing the possibility of a provisional registration of fifth year students following suit of new proposals drafted by the PSNI of Northern Ireland. Personally speaking with the exponential increase of uncertainty I believe such a proposal would alleviate the high strenuous workload that our pharmacists are currently under. As an anecdotal presumption following the recovery of the COVID-19 outbreak I predict a high number of staff resignations following the consecutive strenuous efforts seen not just in pharmacy but throughout healthcare as a whole. So therefore following our PRE examination currently purposed in September I would suggest to continue provisional registration (if</p>	<p>The current legislative framework does not provide for provisional registration and we are not aware of any current policy proposal which would provide for provisional registration for pharmacy students.</p> <p>The proposed amendment is to provide only for exceptional circumstances that may arise whereby an individual student is not in a position to complete the required consecutive eight month experiential placement, and facilitates recognition of a six months period in these circumstances. The time period of eight months is the standard legislative requirement in place.</p>

	granted) for fifth year students and then grant formal registration once students has passed their PRE examination.	
10	<p>I support the decision made by the PSI to reduce the period of internship from 8 months to 6 months. Is there a possibility of the PRE date moving forward to facilitate early registration or a form of temporary registration as is being considered in the UK &amp; NI. <a href="https://www.rpharms.com/about-us/news/details/Pre-reg-exams-postponed">https://www.rpharms.com/about-us/news/details/Pre-reg-exams-postponed</a>. In the case of PRE going ahead early or on the scheduled date of September 26th, could the time be reduced between the PRE results being released and registration (ie having to wait for Graduation on November 17th to apply to the register for December - leading to ~6 weeks unnecessary delay)</p>	<p>The current legislative framework does not provide for provisional registration and we are not aware of any current policy proposal which would provide for provisional registration for pharmacy students.</p> <p>The proposed amendment is to provide only for exceptional circumstances that may arise whereby an individual student is not in a position to complete the required consecutive eight month experiential placement, and facilitates recognition of a six months period in these circumstances. The time period of eight months is the standard legislative requirement in place.</p>
11	<p>Notwithstanding the exceptional current circumstances, I disagree with the proposed amendment to the PSI's requirements for student placement. I understand the potential impact on a student's ability to register which is outlined in the website notice. However, I assume that the PSI as a regulator has set these requirements with protection of the public in mind and that there is every good reason for a placement to be 12 months/8 months long rather than 10 months/6 months long. I do not see any information on the website regarding the potential impact on or risk to the safety of the public as a result of the proposed change. I would expect the regulator to communicate and weigh the impact on public safety alongside the impact on students.</p> <p>I do not think that illness of a student or preceptor is an extraordinary circumstance and would expect that</p>	<p>The Professional Qualifications Directive 2005/36/EC as amended requires that a period of six months of experiential training be undertaken during or at the end of the theoretical and practical training. The details of the training required are laid out in Article 44 of the Directive.</p> <p>Pharmacy students are still expected to engage with all learning requirements as laid down by the HEIs.</p> <p>The point regarding risk is noted. This is mitigated however in that the PSI (Education and Training) (Integrated Course) Rules 2014 Rule 20 assures that an MPharm may not be awarded unless the Head of School "signs-off" that a student has demonstrated the necessary competencies as set out in the Core Competency Framework, has not any health impairments that would compromise ability to discharge duties of a pharmacist and that the Head of School is satisfied the person is fit to be a registered pharmacist.</p>

	<p>education programmes make provision already for a student unable to reach the required placement hours due to illness or other circumstance. This may include additional time to complete the placement hours required, which is likely to delay her/his graduation. While the closure of a pharmacy may be an more unusual happening, the principle is the same. If the original 8 month block of experiential placements is deemed essential for safe practice and I agree that it it, the full period of placement must be completed even if this takes longer than originally planned.</p>	
12	This is a fair change in regulation.	Noted.
13	<p>I am emailing you in regard to the upcoming changes to the existing statutory rules which set out the education and training requirements for the five-year integrated Masters degree in pharmacy (MPharm). I understand that the 'PSI proposes an amendment to the Rules that will reduce the legislative requirement for placement to a period of six months in exceptional circumstances and within the period of eight consecutive months provided for in the higher education institutions' calendar.' Will these exceptional circumstances only relate to the person being personal affected by COVID-19 or will it include other exceptional circumstances e.g. sickness other than the corona virus e.g. severe anxiety due to the outbreak, grieving, other illnesses or disease etc...? Will these exceptional circumstances be clearly outlined. Also in the case that the student's preceptor is unable to complete their role as educator is it possible to nominate a different preceptor? The current preceptor may have to self isolate or work separately to the student to reduce risk of spread or/and promote social</p>	<p>The proposed amendment is intended to mitigate circumstances that may reasonably arise for individual students in light of the exceptional circumstances presenting during the COVID-19 emergency. Those circumstances may include, for example:</p> <ul style="list-style-type: none"> <li>• a student, a preceptor, or both, being required to self-isolate, or self-quarantine or, because of illness, being unable to continue in their placement, or</li> <li>• a circumstance whereby a pharmacy may have to close for a defined period of time and thereby impact the experiential learning placement.</li> </ul> <p>The proposed amendment would facilitate APPEL in instituting guidelines to support and manage each individual application under the provisions of the legislation.</p> <p>APPEL who manage the experiential learning placements have policies and procedures in place to accommodate sick leave and its impact on a student's placement as well as situations where a</p>



	<p>distancing. It has also been announced the the HSE will be inspecting businesses to ensure they are complying with social distancing. This is very difficult to ensure in a small dispensary and it may mean some staff will have to remain at home. This may mean that student placement will have to cease. Is it possible to transfer a student to a different pharmacy at this stage in the placement cycle.</p>	<p>change of preceptor or placement is required.</p>
14	<p>The School of Pharmacy (UCC) welcomes the proposed amendments rules of 2020 to SI 377/2014. We welcome the removal of the following wording ‘8 consecutive months’ in the current uncertain times. We are happy to work with the PSI in their continued support for Pharmacists and Pharmacy Students going forward. We would welcome the opportunity to review the wording within SI 377/2014, in the future in order to reduce the necessity for further amendments.</p>	<p>Noted.</p>
15	<p>I am happy with this change overall and it should suffice but I would be worried about a worst case scenario. If it's a possibility the 8 month timeline cannot be met then realistically there is a possibility a six month timeline could not be met. I understand there has to be a cut off and this is in line with european legislation. Can there be a provision in there that if for the a scenario which does not meet the 6 month requirement and that you don't lose your entire placement as a result. Say you only get 5.5 months of your placement time before your OSCE that as long as you make the time as soon as it is possible before graduation date or the qualification date or something like that? As I understand you would have to go and restart the whole 6 month period again if its not complete before the OSCE date?</p>	<p>The concern is noted. Individual circumstances will have to be assessed, however the proposed legislative change is only relevant in exceptional circumstances related to the current COVID-19-pandemic and will be implemented according to APPEL guidelines.</p> <p>The provision is not to change the legislative requirement which requires that students must undertake eight consecutive months in a patient-facing experiential learning placement in their fifth year.</p>

16	<p>As a fifth year student and class representative, I believe the proposal is a fair amendment to the current legislation. I think it will allow students to focus on their placement without the added burden of worrying about missing placement should they contract COVID-19 or need to self isolate. I would however, like to enquire as to whether this instrument is limited to a student self isolating due to their own illness or close contact or will it stretch to covering a student who requires time off placement due to a parent/close relation (who may not necessarily be a close contact) contracting the illness and requiring care. Would this also cover a student if they were bereaved as a result of the pandemic? if you could clarify this I would appreciate it. I also think it is a positive step that students were consulted in this process.</p>	<p>The proposed legislative change is only relevant in exceptional circumstances related to the current COVID-19-pandemic and will be implemented according to APPEL guidelines.</p> <p>The provision is not to change the legislative requirement which requires that students must undertake eight consecutive months in a patient-facing experiential learning placement in their fifth year.</p>
17	<p>I am writing to express my support for the proposed changes by the PSI to the existing statutory rules which set out the education and training requirements for the five-year integrated Masters degree in pharmacy (MPharm). Given the unprecedented and challenging times we are in at the moment and because of the great work being carried out by our 5<sup>th</sup> year pharmacy students both in community and hospital pharmacy, there is an increased risk that some students may e.g. contract COVID 19/ be a close contact to someone who has tested positive with COVID 19. In this case these students will be required to self-isolate and miss out on a considerable length of placement time during this 8 month placement. This proposed amendment to shorten the minimum placement time to 6 months is safeguarded in my opinion with the requirement for students to pass the summative assessment performed by the Senior Preceptor</p>	<p>Noted.</p> <p>The proposed legislative change is only relevant in the context of the current COVID-19-pandemic.</p>

	towards the end the placement. To pass this students must achieve a minimum level 4 rating in all of the behaviours in domains 1 to 6 of the PSI's Core Competency Framework.	
18	<p>1. The amendments look appropriate, necessary and proportionate to the challenge being faced.</p> <p>2. The amendments are specific to the current situation and appear suitably "future-proof".</p> <p>3. The amendments are compatible with the minimum requirements expressed in the PQD.</p> <p>4. PSI and educating bodies will already have expertise in dealing with situations where students are unable to meet minimum requirements due to unforeseen circumstances such as illness etc. Accordingly, processes will already be in place to manage students who may need additional supports or training time in order to complete.</p> <p>5. In considering its regulatory response, PSI will certainly continue to prioritise competence and patient safety as expressed in the Core Competency Framework.</p>	<p>Noted.</p> <p>The pharmacy students will have to engage with all learning requirements as laid down by the Higher Education Institutions (HEI).</p> <p>The PSI (Education and Training) (Integrated Course) Rules 2014- Rule 20 assures that an MPharm may not be awarded unless the Head of School is in a position to "sign-off" that a student has demonstrated the necessary competencies as set out in the Core Competency Framework, has not any health impairments that would compromise ability to discharge duties of a pharmacist and that the Head of School is satisfied the person is fit to be a registered pharmacist.</p>
19	I would be quite concerned at this as I feel my student would require more training than only six months. Although we have completed almost three months and my student is progressing well now however in light of the pandemic I am in a vulnerable group so I can't supervise my student for the next couple of weeks. Although I have a good support pharmacist and great network in my workplace I would not be happy to sign my student off in June as proposed. As we don't know how long more the restrictions are going to be in place for. I would think my student would benefit from eight months placement as originally was the case.	<p>The provision is not to change the legislative requirement which requires that students must undertake eight consecutive months in a patient-facing experiential learning placement in their fifth year.</p> <p>The proposed legislative change is only relevant in exceptional circumstances related to the current COVID-19-pandemic and will be implemented according to APPEL guidelines.</p> <p>The pharmacy students will have to engage with all learning requirements as laid down by the Higher Education Institutions (HEI).</p>

		Furthermore, the PSI (Education and Training) (Integrated Course) Rules 2014- Rule 20 assures that an MPharm may not be awarded unless the Head of School is in a position to “sign-off” that a student has demonstrated the necessary competencies as set out in the Core Competency Framework , has not any health impairments that would compromise ability to discharge duties of a pharmacist and that the Head of School is satisfied the person is fit to be a registered pharmacist.
20	The only aspect that concerned us was the minimum duration of six months. If the pharmacy were to stay closed for longer than this period, would it be possible for APPEL and/or the Pharmacy Chain (if applicable) to move the student to a different pharmacy so that this minimum duration isn't compromised? Thanks for reaching out to us for involvement. It is greatly appreciated.	APPEL have policies and procedures in place to deal with situations where a change of preceptor or placement is required.
21	The Board of APPEL and I welcome the proposed amendment to the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) (Amendment) Rules 2020. As the COVID-19 situation evolves, the Board of APPEL and I are very conscious of the many challenges being faced by our MPharm students, their senior preceptors and pharmacy teams. COVID-19 has already impacted MPharm students, their senior preceptors and training establishments. This proposed amendment will enable students to continue to register as pharmacists in the exceptional circumstances where they are affected by the COVID-19 pandemic. Furthermore, this amendment supports the current Government policy position to ensure the workforce is sufficient to meet the challenges that as a nation, we are currently experiencing. The Board of APPEL and I would suggest that the following amendment be made	Noted.  The proposed amendment to the legislation appears reasonable and it is recognised that it could allow for a more streamlined and prompt response to students who may have to make a request under exceptional circumstances.

<p>to the proposed draft rules from, (see underlined text):</p> <p>(1A) Notwithstanding paragraph (1) and Rule 6(b), in the exceptional circumstances arising from the Covid-19 emergency, in the case of a person to whom paragraph (1) applies who commenced his or her fifth year in-service training prior to 1 March 2020, the requirement to complete at least 12 months of in-service practical training including not less than eight consecutive months of the training referred to in paragraph (1)(b) may be reduced, <u>at the discretion of the Council</u>, to a requirement to complete 10 months of in-service practical training including not less than six months of the training referred to in paragraph (1)(b).</p> <p>To:</p> <p>Notwithstanding paragraph (1) and Rule 6(b), in the exceptional circumstances arising from the Covid-19 emergency, in the case of a person to whom paragraph (1) applies who commenced his or her fifth year in-service training prior to 1 March 2020, the requirement to complete at least 12 months of in-service practical training including not less than eight consecutive months of the training referred to in paragraph (1)(b) may be reduced, <u>at the discretion of the recognised institution</u>, to a requirement to complete 10 months of in-service practical training including not less than six months of the training referred to in paragraph (1)(b).</p> <p>This proposed change would align to the role of the PSI in the delivery of pharmacy education as that of an accrediting body with no direct role in the delivery of pharmacy education. Each recognised institution will then assess students' individual circumstances in the context of the issues pertinent to the regulatory provisions.</p>	
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	The Board of APPEL and I wish to thank PSI for their support of this proposed amendment as part of their current initiatives to meet the challenges arising due to the COVID-19 pandemic for individual students.	
22	<p>I think this change is quite reasonable given the challenges that students may face in getting access to their clinical placement. The revision to six months in exceptional circumstances and within the period of eight consecutive months seems more practical and places less pressure on the student and the system. Of course the current emergency will have special requirements that we may be flexible and supportive of. My concern in this case is to ensure it is linked to the duration of the emergency, which is not clear to me in the wording. A process of monitoring /review when normality resumes might be useful.</p> <p>This seems entirely reasonable to me under the circumstances. We need them in the workplace!</p>	<p>Noted.</p> <p>The proposed legislative change is only relevant in exceptional circumstances related to the current COVID-19-pandemic and will be implemented according to APPEL guidelines.</p>

## Conclusion

We have noted all responses with thanks. PSI recognises the significant challenges arising for all at this time and is grateful to all who responded to this consultation under the very tight timeframe. The feedback and comments will be provided to the Council of the PSI for their consideration.

## Appendices

- A List of targeted stakeholders
- B Proposed Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) Rules 2020 as issued for public consultation.

## Appendix A – List of targeted stakeholders

1	Affiliation for Pharmacy Practice Experiential Learning (APPEL)
2	CORU - the Health and Social Care Regulator
3	The Dental Council
4	Hospital Pharmacists Association of Ireland (HPAI)
5	Irish Institute of Pharmacy (IIOP)
6	IPSA - Irish Pharmaceutical Students Association
7	Irish Pharmacy Union (IPU)
8	Medical Council of Ireland (MCIRL)
9	Nursing and Midwifery Board of Ireland (NMBI)
10	Pharmacists in Industry, Education and Regulatory (PIER)
11	Royal College of Surgeons in Ireland (RCSI)
12	Trinity College Dublin (TCD)
13	University College Cork (UCC)

## Appendix B – Proposed Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) Rules 2020



STATUTORY INSTRUMENTS.

**S.I. No. [ • ] of 2020**

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PHARMACEUTICAL SOCIETY OF IRELAND (EDUCATION AND TRAINING) (INTEGRATED COURSE)  
(AMENDMENT) RULES 2020



PHARMACEUTICAL SOCIETY OF IRELAND (EDUCATION AND TRAINING)  
(INTEGRATED COURSE) (AMENDMENT) RULES 2020

The Council of the Pharmaceutical Society of Ireland, in exercise of the powers conferred on the said Society by section 11 of the Pharmacy Act 2007 (No. 20 of 2007) (as adapted by the Health and Children (Alteration of Name of Department and Title of Minister) Order 2011 (S.I. No. 219 of 2011)), with the consent of the Minister for Health, hereby makes the following rules:-

1. (1) These Rules may be cited as the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) (Amendment) Rules 2020.

(2) The Principal Rules, Rule 14 of the Pharmaceutical Society of Ireland (Continuing Professional Development) Rules 2015 (S.I. No. 553 of 2015), the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) (Amendment) Rules 2017 and these Rules may be cited together as the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) Rules 2014 to 2020.

2. In these Rules “Principal Rules” means the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) Rules 2014 (S.I. No. 377 of 2014).

3. Rule 6(b) of the Principal Rules is amended by inserting “subject to Rule 14(1A),” before “not less than twelve months”.

4. Rule 14 of the Principal Rules is amended by inserting after paragraph (1) the following paragraphs:

“(1A) Notwithstanding paragraph (1) and Rule 6(b), in the exceptional circumstances arising from the Covid-19 emergency, in the case of a person to whom paragraph (1) applies who commenced his or her fifth year in-service training prior to 1 March 2020, the requirement to complete at least 12 months of in-service practical training including not less than eight consecutive months of the training referred to in paragraph (1)(b) may be reduced, at the discretion of the Council, to a requirement to complete 10 months of in-service practical training including not less than six months of the training referred to in paragraph (1)(b).

(1B) In paragraph (1A), ‘Covid-19 emergency’ means the situation resulting from the spread in the State of the disease caused by infection with the virus SARS- CoV-2, being a disease specified as an infectious disease in accordance with Regulation 6 of, and the Schedule to, the Infectious Diseases Regulations 1981 (S.I. No. 390 of 1981), or any variant of the disease so specified as an infectious disease in those Regulations.”.

I, SIMON HARRIS, Minister for Health, consent to the making of the foregoing Rules.

L.S. GIVEN under my Official Seal,  
[DATE] [MONTH] 2020.

SIMON HARRIS,  
Minister for Health.

L.S. GIVEN under the Official Seal of the Council of the  
Pharmaceutical Society of Ireland,

[DATE] [MONTH] 2020.

JOANNE KISSANE,  
President.

NIAL BYRNE,  
Registrar.

## EXPLANATORY NOTE

*(This note is not part of the Instrument and does not purport to be a legal interpretation).*

These Rules allow the Council, in the exceptional circumstances arising from the Covid-19 emergency, to reduce the requirement that fifth year pharmacy students complete eight consecutive months of in-service practical training under the direct supervision of a tutor pharmacist, in a registered retail pharmacy business in the State or in the pharmacy department of a hospital in the State, to a requirement that they complete six months of such training.

These Rules may be cited as the Pharmaceutical Society of Ireland (Education and Training) (Integrated Course) (Amendment) Rules 2020.