

## Response to the consultation on the draft 2012 fees rules for the General Pharmaceutical Council

The consultation asks a series of questions, which are set out here.

You can fill in this questionnaire or go to our website and fill in an online version there.

<http://www.pharmacyregulation.org/fees-consultation-2012>

If you fill in this questionnaire, please send your completed form to:

**email** [consultations@pharmacyregulation.org](mailto:consultations@pharmacyregulation.org) with the subject 'Fees consultation'

**address** Draft 2012 Fees Rules consultation response, Governance Team, General Pharmaceutical Council, 129 Lambeth Road, London, SE1 7BT

If your answer/s take up more than the space allotted, you can attach extra pages if you wish.

Please indicate which question/s any extra pages relate to.

Responses must be received by 8 May 2012.

First, we would like to ask you for some background information. This will help us to understand the views of specific groups, individuals and/or organisations and enables us to better respond to those views.

### **Are you responding:**

- As an individual – Please go to section A
- On behalf of an organisation – Please go to section B

### **Section A - Responding as an individual**

Please supply the following details:

Your name:

Address:

Email:

### **Where do you live?**

- England
- Scotland
- Wales
- Northern Ireland

- Other (please give details)

**Are you responding as:**

- A pharmacy professional – Please go to section A1
- A member of the public
- Other (please give details)

**Section A1 - Pharmacy professionals**

**Are you:**

- A pharmacist
- A pharmacy technician

**Please select the option below which best describes the area in which you primarily work:**

- Community pharmacy
- Hospital pharmacy
- Primary care organisation
- Pharmacy education and training
- Pharmaceutical industry
- Other (please give details)

**If you work in community pharmacy, are you:**

- A pharmacy owner
- An employee

**Section B: Responding on behalf of an organisation**

Please supply the following details:

Your name:

Job title:

Organisation:

Address:

Email:

Contact tel:

**Is your organisation a:**

- Pharmacy organisation
- Non-pharmacy organisation

**Please choose an option below which best describes your organisation:**

- Body/organisation representing professionals
- Body/organisation representing patients/the public
- Body/organisation representing trade/industry

- Community pharmacy
- Corporate multiple
- Independent
- NHS organisation/group
- Research, education and/or training organisation
- Government department/organisation
- Regulatory body
- Other (please give details)

All information in responses, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004).

If you want your response to remain confidential, you should explain why you regard the information you have provided as confidential. However, we cannot give an assurance that confidentiality can be maintained in all circumstances.

An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the GPhC.

Your response to this consultation may be published in full or in a summary of responses.

Responses to the consultation will be anonymised if they are quoted. Individual contributions will not be acknowledged unless specifically requested.

*The GPhC is a data controller registered with the Information Commissioner's Office. The GPhC makes use of personal data to support its work as the regulatory body for pharmacists, pharmacy technicians and retail pharmacy premises in Great Britain. Data may be shared with third parties in pursuance of the GPhC's statutory aims, objectives, powers and responsibilities*

*under the Pharmacy Order 2010, the rules made under the Order and other legislation. Personal data may be processed for purposes including (but not limited to) updating the register, administering and maintaining registration, processing complaints, compiling statistics and keeping stakeholders updated with information about the GPhC. Information may be passed to organisations with a legitimate interest including (but not limited to) other regulatory and enforcement authorities, NHS trusts, employers, Department of Health, universities and research institutions. Please note that the GPhC will not share your personal data on a commercial basis with any third party.*

Draft 2012- 2013 Fees Rules,  
Consultation Response,  
GPhC,  
129 Lambeth Road,  
London,  
SE1 7BT  
[consultationresponses@pharmacyregulation.org](mailto:consultationresponses@pharmacyregulation.org)

## **Consultation on the draft 2012-2013 fees rules for the General Pharmaceutical Council Royal Pharmaceutical Society Response**

Thank you for asking the Royal Pharmaceutical Society (RPS) to comment on the consultation on  
**The draft 2012-2013 fees rules for the General Pharmaceutical Council**

The Royal Pharmaceutical Society (RPS) is the professional body for every pharmacist in Great Britain. We are the only body that represents all sectors of pharmacy in Great Britain. The RPS leads and supports the development of the pharmacy profession within the context of the public benefit. This includes the advancement of science, practice, education and knowledge in pharmacy. In addition, it promotes the profession's policies and views to a range of external stakeholders in a number of different forums.

Its functions and services include:

**Leadership, representation and advocacy:** promoting the status of the pharmacy profession and ensuring that pharmacy's voice is heard by governments, the media and the public.

**Professional development, education and support:** helping pharmacists to advance their careers through professional advancement, career advice and guidance on good practice.

**Professional networking and publications:** creating a series of communication channels to enable pharmacists to discuss areas of common interest.

### **General comments:**

The Society is pleased to have the opportunity to respond to the consultation on the draft 2012-2013 fees rules for the General Pharmaceutical Council (GPhC).

As the Professional Leadership Body we support and commend the GPhC for reducing the regulatory fee burden for pharmacists and pharmacy technicians. It is pleasing to see that the GPhC has not taken the stance of having an annual default position of increasing fees in line with inflation but has attempted to set fees that meet the cost of regulation for the professions.

The challenge for the GPhC will now be to match this stance of "setting fees that meet the cost of regulation" when they introduce their new standards for pharmacy premises and ensure that premises fees are reviewed accordingly.

## **Questions**

We are particularly interested in your views on the following points, although we welcome comments on any issues that you wish to raise in the relation to the draft fees rules

### **Question 1**

**Do you agree with the renewal fee of £240 we propose for pharmacists?**

(see section 7 of the consultation document)

Yes

No

Unsure

Comments

We welcome and commend the GPhC for proposed reduction in the renewal fee for pharmacists.

### **Question 2**

**Do you agree with the renewal fee of £108 we propose for pharmacy technicians?**

(see section 7 of the consultation document)

Yes

No

Unsure

Comments :

We welcome and commend the GPhC for proposed reduction in the renewal fee for pharmacy technicians.

Furthermore now that technician have had one full cycle of joining and renewal on the GPhC register we would reiterate our concerns raised last year namely

“that the GPhC now looks at setting standards and criteria for the activities a registered technician is able to take responsibility for and annotate the register with the additional specialisation of accredited checking technician. This would then provide a framework for risk-based regulation of pharmacy technicians and a fee structure could then be set accordingly.”

### **Question 3**

**Do you agree that the renewal fee for pharmacy premises should remain unchanged at £221?**

(see section 8 of the consultation document)

Yes

- No  
 Unsure

#### Comments

We are fully supportive of the GPhC approach to modernising pharmacy regulation and the setting of standards for registered pharmacies. We acknowledge this is an ongoing piece of work that cannot be reflected in this round of fees. However we would like to reiterate our ongoing concerns that we had previously stated in our response to the GPhC 2011 fee consultation .

Namely:

“we are keen to ensure that the costs of regulation are proportionate to delivering the stated regulatory outcomes and are fair to the fee-paying registrants. We are concerned that at present this doesn't seem to be the case with the costs of regulating the pharmacy profession being allocated disproportionately between the various registrant categories. We would recommend that the GPhC use the exercise of developing premises standard to show transparency in the proportioning of regulatory burden.”

#### Question 4

**Do you agree with our proposal to charge an increased application fee if an applicant for registration was previously removed from the RPSGB's register following a decision by a disciplinary committee?**

(see section 10 of the consultation document)

- Yes  
 No  
 Unsure

#### Comments

If this changes reflects the differing administration burden associated with reason for the removal and adds more transparency to the fees structure then this would be reasonable.

#### Question 5

**Do you agree with our intention to charge differing fees for application for restoration to the register depending on the reason for the initial removal of the entry?**

(see section 11 of the consultation document)

- Yes  
 No  
 Unsure

#### Comments

If this changes reflects the differing administration burden associated with reason for the removal and adds more transparency to the fees structure then this would be reasonable.

#### Question 6

**Do you have any other comments you wish to make?**

We would like assurances that it is still the intention of the Regulator to move to a self funding basis for the, accrediting and approving qualifications and education providers for prospective pharmacy professionals, as we are unaware of any timeframe for this move .