



Royal Pharmaceutical Society of Great Britain

Helping pharmacists achieve excellence

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Dear Emma

Consultation on the revised performance review process and standards

I have provided below the Society's response to the consultation on the revised performance review process and standards.

1. Are the standards measuring the right issues and outcomes?

We broadly agree that the standards of good regulation are measuring the right issues and outcomes. However, we have concerns about some of the standards which we have provided in our response to question 2.

2. Are the standards measurable and achievable?

We agree that the standards are measurable and achievable except in the following areas.

Guidance and standards

The third standard states '*The standards and guidance are published in accessible formats. Registrants, potential registrants, employers, patients and members of the public are aware of the standards and guidance published by the regulator and of the action that can be taken if the standards and guidance are not followed.*' We believe the second part of this standard is not achievable and would be difficult to measure. We suggest that this standard is amended to '*The standards and guidance are published in accessible formats. The regulator informs registrants, potential registrants, employers, patients and members of the public of the standards and guidance and the action that can be taken if the standards and guidance are not followed.*'

Education and training

The first standard states '*Education and training establishments deliver students, trainees or professionals who are fit to practise in their chosen profession*'. As written this standard is the responsibility of the education and training establishment and not the regulator. We suggest that this standard is revised to reflect the regulator's responsibility.

The second standard states *'Registrants maintain the standards required to stay fit to practise and remain on the regulator's register'*. As written this standard is the responsibility of the registrant and not the regulator. We suggest this standard is revised to reflect the regulator's responsibility.

Registration

We believe that the fourth standard *'Employers, patients and members of the public are aware of the importance of checking a health professional's registration'* is not achievable and would be difficult to measure. We suggest this standard is amended to *'The regulator informs employers, patients and members of the public of the importance of checking a health professional's registration.'*

Fitness to practise

We suggest that the second standard *'Information about fitness to practise concerns is shared by the regulator with employers/local arbitrators, system and other professional regulators'* is clarified to recognise the legal limitations for sharing information.

3. Are we requesting the right evidence from the regulators?

We agree that the evidence is appropriate to demonstrate that we are meeting the standards except in the following areas.

Guidance and standards

The evidence includes *'The activities and results of work undertaken to influence the development of European and international regulation and how this work is taken into account in the development of standards and guidance.'* However, the standards of good regulation require the regulator to take into account of developments in European and international regulation not influence developments. As this evidence is not relevant to meeting the standards listed it should be removed.

Registration

The evidence *'The activities and results of work undertaken to influence the development of European and international regulation'* is not relevant to meeting the standards listed and should be removed.

Education and training

We are unclear what evidence *'Details of how stakeholders can access the final assessments of education and training providers and the approval process'* requires. This should be clarified.

4. Will the process enable CHRE to meet our corporate values and the principles of good regulation?

We support the revisions made to the performance review process and agree the standards reflect the principles of good regulation.

5. Will the process and standards enable CHRE to robustly review the performance of the regulators?

We have no response to this question.

6. Are there other evidence sources or review methods we could use?

We support CHRE's proposed use of third party feedback from relevant stakeholders and the use of other evidence such as the fitness to practise audits, research projects and policy work to challenge and test the evidence provided by regulators.

7. How can we ensure that the report was useful for members of the public and the regulators?

We recognise that CHRE faces a challenge in making the report useful for members of the public and for the regulators. We suggest that the parts of the report that are most relevant to members of the public are highlighted and a summary aimed at members of the public is provided at the front of the report. If it does not already do so, CHRE may also wish consider involving members of its Public Stakeholder Network in the drafting of the report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Holmes', written in a cursive style.

Jeremy Holmes
Chief Executive and Registrar