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Consultation on draft changes to fees Royal Pharmaceutical Society Response

Whilst we are not answering the detailed questions in our response there are a couple of points we would like to make.

We strongly support the need for effective regulation. Regulation is essential to safeguard and ensure that the quality and safety of care that people are entitled to receive from pharmacy professionals and within pharmacy settings is met. It is also crucial as a means to ensure that pharmacy professionals are working in safe and supportive working environments.

We welcome some of the efforts made by the GPhC to reduce their cost base but believe that these should be taken further so that any fee increase is reduced. The difficult current financial situation that many pharmacy professionals find themselves in as the cost-of-living crisis continues means that any increase should be minimised. The registration fee is not optional for registrants, they need to be registered to be able to make a living, and therefore, this needs to be taken into consideration when increasing the fees. As GPhC made a surplus of £2.5m last year, over and above the expected surplus of £0.8m¹, this brings into question whether a fee increase is required at all.

In addition, the registration fee is not equitable for those who are currently not actually practising, such as those who are undertaking maternity or paternity leave. The GPhC is out of step with other regulators, such as the GMC, who have allowances in discounts for these circumstances. The GPhC should consider their approach to registration for these professionals, enabling fees to be significantly reduced during this time when they are not practising.

Introducing income related discounts has the potential to support some pharmacy professionals who may be struggling. There are opportunities to learn how this is being done by other regulators such as the GMC who give reductions

¹ https://www.pharmacyregulation.org/sites/default/files/document/gphc-annual-report-2021-22-august-2022_0.pdf



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Wales Board Chair: Dr. Geraldine McCaffrey MRPharmS for doctors on low incomes, and doctors in their foundation years. Other regulators including the GOC and HCPC who also offer differential fees, which suggests that this approach is possible.

RPS offers reduced fees for members not working, who are on maternity leave and for members with a long-term illness. We also offer reduced fees for the first and second year after qualification. We are aware that this approach could incur additional costs for the GPhC and therefore suggest that the GPhC explore how this could be funded from existing reserves.

Many Thanks



Tase Oputu And

Tase Oputu Andrew Carruthers Geraldine McCaffrey
Chair, English Pharmacy Board Chair, Scottish Pharmacy Board Chair, Welsh Pharmacy Board

Gerldin M'Co

