

# ROYAL PHARMACEUTICAL SOCIETY

## Proposal for the use of patient group directions by pharmacy technicians

### Royal Pharmaceutical Society Response

**Do you agree or disagree with the proposal to amend the Human Medicines Regulations (2012) to enable pharmacy technicians to supply and administer medicines to patients using PGDs?**

- agree
- disagree
- don't know

**If you have any additional information to support your answer, please provide details (maximum 150 words).**

Skill mix is vitally important in delivering modern and efficient pharmacy services. Increasing the opportunities for pharmacy technicians to further develop their role has the potential to strengthen the foundation for pharmacy practice across all sectors. As managing the health of patients becomes more complex, with multiple long-term conditions and more complex medicines and therapies, the need for pharmacists to focus on clinical and therapeutic interventions is increasing. The supply and administration of medicines under a PGD should be reserved for situations where this offers an advantage for patient care, without compromising patient safety.

The three country visions for pharmacy, across RPS, all strongly support the development of the whole pharmacy team, fully utilising the skill mix of all members to release the clinical capacity of pharmacists.

**Do you agree or disagree that the 2-year pre-registration training equips pharmacy technicians with the appropriate knowledge and skills to complete the training requirements which allow them to use PGDs?**

- agree
- disagree
- don't know

**If you have any additional information to support your answer, please provide details (maximum 150 words).**

The core training provides the appropriate knowledge and skills to ensure the development of a competent and safe practicing pharmacy technician. However, to date this training has not encompassed the skills and knowledge to supply and administer medicines under a PGD. If this amendment is adopted, training needs to be adapted to reflect the legislation change and ensure technicians are provided with an appropriate knowledge base of PGDs and the governance and accountability that lies with them, in line with training delivered to pharmacists when originally commenced involvement with PGDs

Current practicing pharmacy technicians who may operate under PGDs if the legislation changes in the future, should also undertake additional training to ensure a baseline understanding of PGDs. We

should look to the guidance for additional training from other healthcare professions operating under PGDs, for example, dental hygienists.

Consideration should be given to the most appropriate healthcare professional(s) to utilise individual PGDs in the context of setting and clinical indication.

**Do you agree or disagree that allowing pharmacy technicians to supply and/or administer under a PGD will enable safe access to medicines for patients?**

- **agree**
- **disagree**
- **don't know**

**If you have any additional information to support your answer, please provide details (maximum 150 words).**

Pharmacy technicians are integral to the provision of pharmacy services. Pharmacy technicians who undertake these additional responsibilities would continue to adhere to the same principles of practice that apply to pharmacists including competency-based training and assessment of skills and knowledge. PGDs are designed to mitigate risk as far as possible, with clear inclusion and exclusion criteria to reflect the decision-making skills of those using them.

As with all healthcare professionals, it is critical that pharmacy technicians should only work within their competence and can demonstrate competence prior to starting a particular PGD. Pharmacy technicians must be supported with appropriate training to reflect the needs of a particular PGD and have ongoing support in place.

**This proposal is to allow registered pharmacy technicians to supply and administer medicines using a PGD.**

- **Do you have additional information in support of this proposal? (maximum 150 words)**

Enabling pharmacy technicians to undertake further services under a PGD will increase capacity for pharmacy teams and further support consistency of services being offered within pharmacy. This enhanced skill mix will allow greater flexibility for pharmacists to manage their workflow safely and effectively. Greater utilisation of the skills of pharmacy technicians could increase patient access to services whilst also building capacity to support the introduction of more enhanced pharmacist led clinical services. The increased capacity will be a valuable and crucial resource as we aim to increase the uptake on flu and COVID-19 vaccinations now and in future years. Enabling pharmacy technicians to supply and administer medicines under a PGD could support transformational change within pharmacy teams and enable evolution of the pharmacist's role into more complex clinical care.

- **Do you have additional information for why this proposal should not go ahead? (maximum 150 words)**

Clarity is needed in terms of who is ultimately accountable for the supply and administration of medicines under a PGD in a registered pharmacy premises. Clear guidance would be required for the accountability between the Responsible Pharmacist, Chief Pharmacists, Directors of Pharmacy, Superintendent Pharmacist and the professional operating the PGD. Lines of accountability needs to be clear across all sectors.

**Do you agree or disagree that the consultation stage impact assessment gives a realistic indication of the likely costs, benefits and risks of the proposal?**

- agree
- disagree
- don't know

**If you have any additional information to support your answer, please provide details (maximum 150 words).**

We agree with the impact assessment in so much as it states that the likelihood of any increased risk of inappropriate administration of medicines is considered to be very low and is outweighed by the benefits of this proposal. However, the impact assessment requires further detail and makes some significant estimates, which seem to be numbers without any real data to back them up. We have concerns that these numbers underplay the additional costs of training and appropriately supporting the pharmacy technician workforce to deliver this. The cost of training and support to enable pharmacy technicians to undertake PGDs does not appear to be taken into consideration as part of this impact assessment.

There does not appear to be any reflection of professional indemnity costs which would likely increase for pharmacy technicians as they undertake this new role.