



General Pharmaceutical Council
25 Canada Square
London
E14 5LQ

05 October 2017

Dear Colleague

Consultation on guidance to ensure a safe and effective pharmacy team

The Royal Pharmaceutical Society (RPS) is the professional body for pharmacists 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 including the advancement of science, practice, education and knowledge in pharmacy. In addition, we promote the profession's policies and views to a range of external stakeholders in a number of different forums.

The RPS welcomes the opportunity to respond to this consultation and has answered the questions asked by the GPhC in its discussion paper as follows:

The new framework

At the moment, through the existing minimum training requirements, individual pharmacists are accountable to the GPhC for the training of staff, which should be the responsibility of the owner. The new framework will make it clear that the pharmacy owner is accountable for making sure unregistered pharmacy staff are competent for their roles.

Question 1: Do you agree with the proposed approach?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

The RPS supports this approach. It should be the responsibility of the pharmacy owner to put in place mechanisms to ensure unregistered pharmacy staff are trained and competent in their roles. However, it is not clear how owners will achieve this or whether they have the necessary skills to implement such mechanisms including the correct governance and that consistency is applied within and across organisations - pharmacists and pharmacy technicians should be integral to such mechanisms and a suitably trained registrant should be involved with signing-off of competence. Ultimately, these employees are also accountable to their employers to follow their contract and act accordingly and although they are unregistered they have a duty of care under the law.

As well as ensuring that their staff are competent, employers should ensure that staff are not placed in a position that forces them to work beyond their level of competence. Through policies and procedures, the employer must define delegation and authorise the staff member to perform a task or duty. In accepting the delegated responsibility to undertake a task or duty the staff member should have the ability to perform the activity.

The RPS agrees with the clarity given about pharmacists delegating responsibility i.e. only delegate tasks and duties that are within the staff member's competence, make sure that this person is adequately supported and supervised and be satisfied that the outcome of the task or duty meets the required standard. It is important that in communicating this guidance pharmacists are made aware of their continued responsibilities in this area.

The RPS would request clarity on how pharmacists will be guided and supported if they take a different view from the pharmacy owner on the competence of a member of staff. In addition, staff should not be placed in a situation where they are working in a pharmacy with unsafe staffing levels. Pharmacy owners should set minimum staffing levels for a defined workload. Pharmacists and pharmacy technicians should also know what action to take if there are no staff available with the appropriate competence.

Draft guidance

The GPhC has developed guidance which sets out the key areas that are needed to ensure a safe and effective pharmacy team, with a specific focus on unregistered pharmacy staff. It covers:

- governance
- education and training requirements
- knowledge, skills and development
- maintaining a person-centred environment
- management and leadership roles

Question 2: Does the proposed guidance adequately cover the key areas to ensure a safe and effective team?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Question 3: Is there anything else not covered in the guidance that you would find useful? Please give details.

The RPS believes that it is useful for the GPhC to set out the key areas that are needed to ensure a safe and effective pharmacy team and rightly points out that pharmacists and pharmacy technicians have an important role in good governance. It is therefore important that pharmacy owners can demonstrate that good governance arrangements have had a high level of professional input – input from the superintendent pharmacist should be sought as a minimum.

It would be helpful for the GPhC to make it clear how the pharmacy employers will communicate to professionals (including locum staff) that non-registered staff have received the required training e.g. via accessible training records.

The guidance should also cover registered pharmacies operating in hospitals and be used as good practice for all pharmacy services in all environments in which medicines are being supplied to patients. Consistency in skills and competencies related to sale and/or supply of medicines is required in all settings.

Pharmacy professionals should be supported and empowered to record and learn from their mistakes and near misses. Therefore the guidance should also stress the need for a quality system to be in place so that the whole pharmacy team adopts an open, candid learning culture in response to errors and service improvement is based on patient/service user feedback and experience.

Training requirements

The GPhC want to make sure that appropriate training is provided for all staff so that patients receive quality care. Their aim is for a framework which provides assurance that this training takes place to an appropriate level, but it is also flexible so that employers can tailor training to the needs of the team and the services they provide. The draft guidance makes it clear that unregistered pharmacy staff who are involved in dispensing and supplying medicines must have the knowledge and skills of the relevant units of a nationally recognised Level 2 qualification, or are training towards this.

Question 4: Do you agree with the minimum level of competence for unregistered pharmacy staff who are involved in dispensing and supplying medicines?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

The definition of a nationally recognised Level 2 qualification must be made clear i.e. a qualification from a recognised Awarding Body. There is a risk that if the GPhC no longer provides professional approval of training for dispensing assistants and medicines counter assistants that there will be considerable variability in the quality of these courses and employers may find trainees are enrolled on courses that are not fit for purpose with the consequence that the staff member is unable to reach competency and this may affect patient care. There is also a risk of inadequate learner experiences with the result that employees may decide pharmacy is not a career for them. Employers will require useful guidance on courses that are suitable. Removing this professional approval may encourage many new and perhaps unsuitable courses being available which could be lower cost and shorter than the current courses available but which fail to meet the required level of quality. Some employers will require further support and guidance to ensure the skill mix of staff remains appropriate. Guidance should also emphasise that training requires adequate resourcing including the time available for learning away from the workplace.

Within the guidance there are references to 'appropriate training' and 'trained accordingly' – precise standards and guidance would be more helpful. The RPS could undertake the role of professionally approving courses via its accreditation service – this would help provide quality assurance and standardisation.

The guidance makes it clear that all unregistered pharmacy staff who need further education and training to meet the required competency level for their role should be enrolled on an appropriate training programme within three months of starting in their role.

Question 5: Do you agree with the proposed approach?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Three months is an appropriate time period for inducting staff and enrolling them on a training programme. However, other quality indicators should be applied that go beyond recruitment onto a course. For example, time taken to complete the course should be 12 months in most circumstances (extended if on maternity leave or longer term sickness absence).

Impact

Question 6: What impact do you think the proposals will have on pharmacy owners?

Please insert your response

The proposals will require investment by owners, but those who already recognise staff as a key asset will be doing this already. In the medium - long term the impact on pharmacy owners will be positive. In the short term this may cause additional pressure, including increased investment in the business by pharmacy owners who are facing reduced funding and other pressures. Fully utilising pharmacists, pharmacy technicians and non-registered pharmacy staff to work at the top of their licence or skill set can release capacity to provide additional patient services so the guidance should emphasise the positive outcomes to offset the short-term additional investment.

No impact	<input type="checkbox"/>
Mostly positive	<input type="checkbox"/>
Partly positive	<input checked="" type="checkbox"/>
Positive and negative	<input type="checkbox"/>
Partly negative	<input type="checkbox"/>
Mostly negative	<input type="checkbox"/>

Question 7: What impact do you think the proposals will have on pharmacy professionals?

Please insert your response

The proposals will strengthen the pharmacy team, allowing pharmacy technicians and pharmacists to utilise their respective skills more effectively

No impact	<input type="checkbox"/>
Mostly positive	<input type="checkbox"/>
Partly positive	<input checked="" type="checkbox"/>
Positive and negative	<input type="checkbox"/>
Partly negative	<input type="checkbox"/>
Mostly negative	<input type="checkbox"/>

Question 8: What impact do you think the proposals will have on unregistered pharmacy staff?

Please insert your response

A better sense of job satisfaction and encouragement for career progression

No impact	<input type="checkbox"/>
Mostly positive	<input checked="" type="checkbox"/>
Partly positive	<input type="checkbox"/>
Positive and negative	<input type="checkbox"/>
Partly negative	<input type="checkbox"/>
Mostly negative	<input type="checkbox"/>

Question 9: What impact do you think the proposals will have on people using pharmacy services?

Please insert your response

As answer to Question 7 – this will result in better service provision and patient care

No impact	<input type="checkbox"/>
Mostly positive	<input checked="" type="checkbox"/>
Partly positive	<input type="checkbox"/>
Positive and negative	<input type="checkbox"/>
Partly negative	<input type="checkbox"/>
Mostly negative	<input type="checkbox"/>

Question 10: Do you have any other comments?

The RPS believes that non-pharmacist/non-pharmacy technician managers (who may be managing pharmacists and pharmacy technicians) should sign up to a voluntary code of practice that defines correct attitudes and behaviours to working with professionals so that they are not placed under unacceptable levels of workplace pressure or an overly target driven culture that ignores pharmaceutical care and patient safety. The RPS can host a voluntary register of non-pharmacy managers who sign up to a code of practice and also offer an approved training course explaining what good practice looks like. This could also be used as good practice for other organisations e.g. NHS Trusts, GP Practices, private providers etc.




Equality analysis

The GPhC believes the guidance to ensure a safe and effective pharmacy team should have positive implications for people and has not identified any implications that would discriminate against or unintentionally disadvantage any individuals or groups who share the particular protected characteristics set out in the Equality Act 2010.

Question 11: Do you think the proposals might have an impact on certain individuals or groups who share any of the protected characteristics?

None

Yours sincerely

		
Ms Sandra Gidley FRPharmS Chair, English Pharmacy Board	Dr John McAnaw PhD, MRPharmS Chair, Scottish Pharmacy Board	Ms Suzanne Scott-Thomas MRPharmS Chair, Welsh Pharmacy Board