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Scottish Government
St Andrews House
Regent Road
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EH1 3DG

4 February 2016

Dear Sir/Madam

Consultation on proposals for the introduction of an Independent National (Whistleblowing) Officer (INO)

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in Great Britain. Our role is to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmaceutical services in England, Scotland and Wales.

We have a statutory role in relation to ‘system’ regulation (as we regulate registered pharmacies) as well as ‘professional’ regulation of individual pharmacists and pharmacy technicians. Our main work includes:

- setting standards for the education and training of pharmacists, pharmacy technicians and pharmacy support staff, and approving and accrediting their qualifications and training
- maintaining a register of pharmacists, pharmacy technicians and pharmacies
- setting the standards of conduct, ethics and performance that pharmacy professionals have to meet throughout their careers
- setting the standards of continuing professional development that pharmacy professionals have to achieve throughout their careers
- investigating concerns that pharmacy professionals are not meeting our standards, and taking action to restrict their ability to practise when this is necessary to protect patients and the public
- setting standards for registered pharmacies which require them to provide a safe and effective service to patients
- inspecting registered pharmacies to check if they are meeting our standards

We welcome the opportunity to respond to the consultation on establishing an Independent National Whistleblowing Officer (INO) for the NHS in Scotland. Whilst the consultation document as a whole is of interest to us we have limited our response to areas where we feel our work is directly relevant to the proposals.

Health professionals being open and honest when things go wrong is fundamental to protecting patients and upholding confidence in health professionals and providers of care. We believe that a culture of openness in the NHS, and across healthcare in general, is critical to improving safety and ensuring less emphasis on blame and more focus on transparency, speaking up and learning from mistakes when things go wrong.

We are committed to embedding the learning from key failures in care in all areas of our work and to playing our part in promoting and supporting an open and honest culture.

To date, we have:

- produced a joint statement with other health professional regulators about the duty of candour
- included a specific standard about 'openness, honesty and learning' in our standards for registered pharmacies
- included specific guidance about the duty of candour and raising concerns in our decision making guidance for statutory committees
- considered how to make explicit the requirement for pharmacy professionals to speak up when they have concerns or things go wrong in our standards of conduct, ethics and performance

Like the Scottish Government, we support the powerful and compelling messages in the Freedom to Speak Up report and believe its findings are relevant to a range of policy developments across Great Britain. We therefore welcome the proposed role of the INO and view it as a further means of helping bring confidence to those wishing to raise concerns, as well as providing an important element of external review and assurance that genuine concerns are being treated seriously and investigated appropriately.

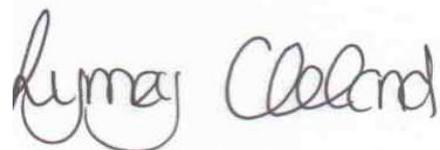
As the consultation document has highlighted, there are a range of avenues and organisations that healthcare professionals can access for support and advice when they have a concern. The INO should complement the existing framework. Effectively communicating the purpose and scope of the role is important in ensuring that the process for reporting concerns and engaging with the INO is widely understood and as simple and accessible as possible.

We believe that no one organisation or individual can drive cultural change. It will take a joint effort from all involved; professionals and their leadership bodies, employers, education providers, regulators and governments; to embed the culture of openness and make it the everyday norm. In pharmacy, we have seen leadership bodies and trade sector organisations have worked collaboratively to promote a culture of openness, including reporting and learning from medication incidents. This highlights the importance of achieving common goals through collaborative working.

The relationship between the INO and professional regulators, including ourselves, will therefore be important and is something that we believe is missing from the current proposals. It is our view that the relationship between the INO and professional regulators should complement and support the strong focus on openness, honesty and candour in our current work. This is an area that we would be keen to explore further with the Scottish Government in terms of both our systems and professional regulation work to help ensure that the INO effectively links to all organisations that have a role to play in considering concerns about the safe and effective provision of healthcare services in Scotland.

If you would like to discuss the points raised in this response, or any other aspects of the GPhC's work, please do not hesitate to contact me on the details below.

Yours sincerely



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