Emergency registration

Purpose
To agree arrangements for temporary registration and annotation of the register in the event that an emergency is declared.

Recommendation
The Council is asked to agree that the groups of persons set out in the attached policy in section 3.1 and 3.2 remain the same until the next annual review.

1.0 Introduction

1.1 Under article 34 of the Pharmacy Order 2010, the GPhC has the powers to register fit, proper and suitably experienced people on a temporary basis to act as pharmacists and pharmacy technicians if an emergency is declared by the Secretary of State. In addition, under article 35, the GPhC has powers to annotate the entries of registrants in Part 1 and Part 2 of the register. These powers will cease when the emergency ends.

1.2 In the event an emergency is declared, the GPhC will need to be able to quickly and easily identify a pool of appropriately qualified and competent people who could be called upon to stand in for registered pharmacists and pharmacy technicians. Complex rules or procedures that take time to understand and implement would be undesirable, and likely to fail in the event an emergency is declared. Employers, registrants, potential registrants and the public need to understand who will be called upon and the limits to their responsibilities.
2.0 **Key considerations**

2.1 At the Council meeting in April 2010 when the policy was initially considered, Council requested to be given the opportunity on an annual basis to review the groups of persons which the Registrar considers are fit, proper and suitably experienced to be temporarily registered as pharmacists or pharmacy technicians and to be temporarily annotated as prescribers upon the declaration of an emergency by the Secretary of State.

2.2 The groups are listed in descending order of priority with the aim of ensuring that there are sufficient numbers of persons who can be temporarily registered as pharmacists or pharmacy technicians to maintain pharmacy services in the interests of public and patient safety depending on the nature, extent and duration of the declared emergency.

3.0 **Equality and diversity implications**

3.1 The GPhC policy excludes former RPSGB and GPhC registrants who have not been registered within the past two years. This policy might have an indirectly discriminatory impact with respect to the age of former pharmacists; although the drawing of this line is necessary in public safety terms to ensure that current knowledge and practice is maintained.

4.0 **Communications implications**

4.1 The implementation of this policy includes the requirement for a communication strategy to provide information to registrants, patients and the public and others about temporary registration before, during and after an emergency. This discrete communications strategy would need to include a reminder to temporary registrants of the ethical and professional obligation to work within their competence.

5.0 **Resource implications**

5.1 The implementation of the policy can be met within current resources.

6.0 **Risk implications**

6.1 There is a risk to the health, safety and well being of members of the public if the GPhC does not identify fit, proper and suitably experienced people to act as pharmacists and pharmacy technicians during an emergency.
Recommendation

The Council is asked to agree that the groups of persons set out in the attached policy in section 3.1 and 3.2 remain the same until the next annual review.

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17 October 2011
Appendix 1

Policy on temporary registration arrangements in the event of an emergency involving loss of human life or human illness

1.0 Introduction

1.1 We have powers to register temporarily fit, proper and suitably experienced people to act as pharmacists and pharmacy technicians if an emergency is declared by the Secretary of State. We also have powers to annotate the entries of registrants in Part 1 and Part 2 of the register during an emergency. These powers will cease when the emergency ends.

1.2 During an emergency the General Pharmaceutical Council’s operating capacity could be seriously compromised, so it is essential that preparations are made in advance to allow us to bring suitable additional people onto the Register rapidly and efficiently in an emergency.

2.0 Purpose of policy

2.1 Under article 34 of the Pharmacy Order 2010, the Registrar may temporarily enter in Part 1 (pharmacists) or Part 2 (pharmacy technicians) of the Register persons or specified groups of persons considered fit, proper and suitably experienced during an emergency.

2.2 Under article 35 of the Pharmacy Order 2010, the Registrar may temporarily annotate entries in Part 1 (pharmacists) or Part 2 (pharmacy technicians) of the Register persons or specified groups of persons considered fit, proper and suitably experienced during an emergency.

2.3 The purpose of this policy is to identify the persons or specified groups of persons considered fit, proper and suitably experienced to be temporarily registered or annotated during an emergency.

3.0 Policy statement

3.1 Under article 34 of the Pharmacy Order 2010, and upon the declaration of an emergency by the Secretary of State, the Registrar may register the following groups in Part 1 (pharmacists) for the duration of the emergency in descending order of priority

- Former registrants on Part 1 of the Register (Pharmacists) and those formerly entered on Part 1 of the Royal Pharmaceutical Society Register of Pharmacists within the last two years whose fitness to practise is not impaired
- Post-MPharm pre-registration trainee pharmacists
- Registrants on Part 2 of the Register (pharmacy technicians)
- Former registrants on Part 2 (non-practising) of the Royal Pharmaceutical Society of Great Britain’s Register of Pharmacists whose fitness to practise is not impaired

3.2 Under article 34 of the Pharmacy Order 2010, and upon the declaration of an emergency by the Secretary of State, the Registrar may register the following groups in Part 2 (pharmacy technicians) for the duration of the emergency in descending order of
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priority
- Former registrants on Part 2 of the Register (Pharmacy technicians) and those formerly entered on Part 1 of the Royal Pharmaceutical Society Register of Pharmacy Technicians within the last two years whose fitness to practise is not impaired.
- Former registrants on Part 1 of the Register (Pharmacists) and those formerly entered on Part 1 the Royal Pharmaceutical Society Register of Pharmacists within the last two years whose fitness to practise is not impaired.
- Post-MPharm pre-registration trainee pharmacists.
- Pharmacy students who are undertaking year 3 or 4 of the MPharm.
- Former registrants on Part 2 (non-practising) of the Royal Pharmaceutical Society of Great Britain’s Register of Pharmacy Technicians whose fitness to practise is not impaired.
- Former registrants on Part 2 (non-practising) of the Royal Pharmaceutical Society of Great Britain’s Register of Pharmacists whose fitness to practise is not impaired.

3.3 Under article 35 of the Pharmacy Order 2010, and upon the declaration of an emergency by the Secretary of State, the Registrar may annotate the following groups as prescribers for the duration of the emergency:
- Registrants in Part 1 of the Register (pharmacists).

4.0 Application of policy

4.1 We will maintain up to date data on former registrants who fall under the categories listed above from which to prepare the temporary registers. This information will be updated on a rolling basis but will remain unpublished until such time as an emergency is declared.

4.2 The implementation of this policy will include an operations strategy to publish, maintain, review and close the temporary registers if an emergency is declared and a communication strategy to provide information to registrants, patients and the public and others about temporary registration before, during and after an emergency.

5.0 Measurement and evaluation

5.1 After an emergency, we will hold a review on the implementation of this policy and seek feedback from staff, registrants, patients and the public and other stakeholders.

5.2 The policy will be evaluated on an annual basis to review if the persons and groups identified are still considered fit, proper and suitably experienced to be temporarily registered or annotated during an emergency.

5.3 The policy will be reviewed if there are any amendments or additions to the categories of annotation to Part 1 or Part 2 of the Register.

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