

Consultation on guidance to ensure a safe and effective pharmacy team

July 2017



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About the GPhC

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in England, Scotland and Wales. It is our job to protect, promote and maintain the health, safety and wellbeing of members of the public by upholding standards and public trust in pharmacy.

Our main work includes:

- setting standards for the education and training of pharmacists and pharmacy technicians, and approving and accrediting their qualifications and training
- maintaining a register of pharmacists, pharmacy technicians and pharmacies
- setting the standards that pharmacy professionals have to meet 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



Overview

We know that effective team working is an essential part of providing good-quality care. The introduction to our **standards for registered pharmacies** explains the purpose of the standards: 'to create and maintain the right environment, both organisational and physical, for the safe and effective practice of pharmacy'.

This consultation is about guidance to support those standards, and in particular our desire to strengthen and assure the regulatory framework around unregistered pharmacy staff.

In the past, individual pharmacists have been accountable to the GPhC for the training of staff – which should be the responsibility of the pharmacy owner.

The draft guidance makes it clear that the pharmacy owner is accountable for making sure unregistered pharmacy staff are competent for their roles.

This strengthened accountability for pharmacy owners does not change the important responsibility of individual pharmacists – particularly the responsible pharmacist – to delegate tasks only to people who are competent, or to those that are in training and under supervision.

The draft guidance covers all pharmacy staff, including non-registrant managers. It will describe our expectations about how pharmacy owners will need to assess and assure the competence of their staff, taking into account a minimum level of competence for staff who are involved in dispensing and supplying medicines.

The draft guidance focuses on the role of the pharmacies we regulate. However, we realise that unregistered pharmacy staff work in a range of other settings, including hospitals and GP surgeries. Although we do not regulate these other settings, we hope this guidance provides practical information which will encourage consistency of skills and competencies across settings.

The new guidance, supporting the standards for registered pharmacies, is intended to replace the existing policy on minimum training requirements for dispensing/pharmacy assistants and medicines counter assistants.

We are consulting until **11 October 2017** on the draft guidance for pharmacy owners to ensure a safe and effective pharmacy team.

This consultation document has two sections:

Part 1: The framework

This explains what is changing and why. It sets out what we do now, what we propose to do differently, and what we have taken into account when considering the changes.

Part 2: The guidance

This summarises the key elements of the guidance for pharmacy owners to ensure a safe and effective pharmacy team.

The consultation process

The consultation will run for 12 weeks from July to October 2017. During this time we welcome feedback from individuals and organisations. We will send this document to a wide range of stakeholder organisations, including professional representative bodies, employers, education and training providers, patients' representative bodies and others with an interest in this matter.

We hope you will read this consultation and consider responding. You can get more copies of this document on our website at www.pharmacyregulation.org/pharmteamconsultation or you can contact us if you would like a copy of the document in another format (for example, in larger type or in a different language).

How to respond

You can respond to this consultation in a number of different ways. You can fill in the questionnaire at the end of this document or go to www.pharmacyregulation.org/pharmteamconsultation and fill in an online version there.

If you fill in the questionnaire in this document, please send it to:

consultations@pharmacyregulation.org with the subject 'Pharmacy team consultation'

or post it to us at:

**Pharmacy team consultation response
Standards Team
General Pharmaceutical Council
25 Canada Square
London E14 5LQ**

Comments on the consultation process itself

If you have concerns or comments about the consultation process itself, please send them to:

feedback@pharmacyregulation.org

or post them to us at:

**Governance Team
General Pharmaceutical Council
25 Canada Square
London E14 5LQ**

Please do not send consultation responses to this address.



Our report on this consultation

Once the consultation period ends, we will analyse the responses we receive. Our governing council will receive the analysis in late 2017, and will take the responses into account when considering the proposed changes we want to make to the regulatory framework for unregistered pharmacy staff, including the new guidance for pharmacy owners.

We will publish the analysis of the responses we receive to this consultation. You will be able to see this on our website

www.pharmacyregulation.org

Introduction

We publish **standards which set out the requirements for the provision of pharmacy services** at or from a registered pharmacy and also **standards which set out the behaviours and attitudes that are expected of pharmacy professionals**. Together these standards are designed to:

- create and maintain the right environment for the safe and effective practice of pharmacy
- provide assurance of the safety of, and encourage improvement in the quality of, services provided to patients and the public

As part of our work to review the initial education and training standards for pharmacists, pharmacy technicians and independent prescribers, we think it is right to look at the education and training of unregistered pharmacy staff.

We have carried out a range of consultations and evaluation exercises in the last two years. These have given us useful background and insight into the roles and functions of, and accountability for, unregistered pharmacy staff working in registered pharmacies.

Employers, and in particular owners of registered pharmacies, have a vital role in making sure the pharmacy team, including unregistered pharmacy staff, are competent for their roles.

Who are unregistered pharmacy staff?

There is an important distinction between registered pharmacy staff and unregistered pharmacy staff.

Registered pharmacy professionals have obligations and responsibilities as regulated professionals. This involves meeting all the standards we set for education and training, continuing professional development, and professional conduct.

Unregistered pharmacy staff are staff within the pharmacy team who are not regulated by the GPhC but are involved in pharmacy services at or from a registered pharmacy. They are primarily accountable to their employer. In the context of registered pharmacies, this will generally be the pharmacy owner. It is the pharmacy owner who is responsible for the impact their work has on patients and the public.

Unregistered pharmacy staff work in a variety of roles including as dispensers, medicines counter assistants, delivery drivers and pharmacy managers. They may work full time, part time or just in holidays. Their responsibilities can include: providing information and advice on symptoms and products; selling and supplying medicines; receiving and collecting prescriptions, including assembling and dispensing prescribed items; delivering medicines; ordering, receiving and storing pharmaceutical stock; and leading and managing teams.

Part 1: The framework

As pharmacy changes, we need to make sure that regulation also continues to adapt and respond. This means being clear about the standards we set and how we can assure patients and the public that these standards are being met.

When the GPhC was established in 2010 we inherited a number of policies and procedures for 'support staff'. We see this term as outdated and not consistent with approaches to quality governance and team work. But we know that the staff covered by this term are often the first point of contact with patients and the public, and they have an important contribution to make within the pharmacy team.

The current policy framework is out of date and does not reflect the diversity of roles within pharmacy. It is time to review and update our approach to make sure it is sufficiently flexible and focused on outcomes, to reflect the needs of patients and the public both now and in the future.

History

Before 2005, there were no education and training requirements for unregistered pharmacy staff. This included staff dispensing and supplying medicines. From January 2005, the Royal Pharmaceutical Society of Great Britain (RPSGB) policy stated that pharmacists had a professional obligation to make sure that dispensing/pharmacy assistants and medicines counter assistants were competent in the areas in which they were working. They had to be qualified to a minimum standard equivalent to the relevant units of the Pharmacy Service Skills

Scottish/National Vocational Qualification (S/NVQ) Level 2 qualification, or be training towards this.

In 2010 GPhC adopted the RPSGB's minimum training requirements for unregistered pharmacy staff, and took over the accreditation of dispensing assistant and medicines counter assistant courses. The terms 'medicines counter assistant' and 'dispensing assistant' do not represent precise roles. 'Dispensing assistant' in particular is an umbrella term for a variety of roles supplying medicines to the public.

The **GPhC minimum training requirements policy**, which was formally approved by our council in 2011, places a responsibility on individual pharmacists to make sure staff working in a pharmacy are competent for the role they undertake.

The current framework

The GPhC has a range of regulatory powers covering registered professionals (pharmacists and pharmacy technicians) but these do not extend to unregistered pharmacy staff. We also set standards for registered pharmacies which must be met by pharmacy owners.

At the moment we set minimum training requirements for dispensing assistant and medicines counter assistant roles, where training must be started within three months of being in the role. We also assess training courses through an **approval process** so we can assure the quality of courses. This is a professional rather than a statutory requirement and does not apply to non-registrant managers.

Setting education and training requirements for such diverse roles, and accrediting courses, may no longer be suitable for a dynamic workforce and with the changes that are happening in the provision of pharmacy services, such as the growth of public health services. It also appears at odds with our statutory framework, where our powers of accreditation are explicitly for courses leading to registration as a pharmacist or pharmacy technician.

Although our current approach provides some consistency, there are a range of historic exemptions to the policy which – as time passes – do not provide the right level of assurance. We want to create more appropriate and transparent accountability. We also want to make sure that training more accurately reflects the changing nature of how services are provided by the pharmacy team.

We want to make sure that we can more effectively assure the public that the pharmacy team has the appropriate skills, qualifications and competencies to provide safe and effective care.

What we are proposing

We have reviewed our current framework of non-statutory accreditation of training programmes for unregistered pharmacy staff. Following this consultation on the new guidance for pharmacy owners, and subject to our governing council's approval, we would no longer approve individual training programmes and qualifications for unregistered pharmacy staff.

Pharmacy owners would be responsible for selecting appropriate training for their staff and we would provide assurance of this through our regulation of registered pharmacies including: monitoring of feedback and outcomes from inspection; feedback from employers and others including professional bodies; and, other means of research and analysis. This is because pharmacy services, and the roles required to deliver them, continue to develop and we want to make sure that training provision can be flexible in responding to these changes.

This would not change the important respective responsibilities of pharmacy owners and pharmacy professionals to make sure that any member of staff involved in dispensing and supplying medicines has the knowledge and skills to carry out their tasks safely and effectively.



Part 2: The guidance

Our standards for registered pharmacies describe the outcomes we expect to see for patients and the public. By setting outcomes, we are enabling owners and pharmacy professionals to use their judgement in how best to meet those outcomes for their pharmacy.

How they go about meeting the outcomes may vary depending on the environment, including patients' and local health needs. It is important that pharmacy owners take responsibility for considering how best to organise and train their teams to meet our standards. However, we do need to consider the knowledge, skills and competencies within the pharmacy team as a whole, and we have incorporated key elements of the minimum training requirements policy into the draft guidance.

We have developed guidance to support principle 2 of the standards for registered pharmacies, which says: 'Staff are empowered and competent to safeguard the health, safety and wellbeing of patients and the public'.

The guidance sets out:

- the key areas that should be considered to ensure a safe and effective pharmacy team
- the pharmacy owner's responsibility to make sure unregistered pharmacy staff are competent for their roles and the tasks they carry out
- the pharmacy professional's responsibility to make sure anyone they delegate a task to is competent and appropriately trained, and to exercise proper oversight

- that unregistered pharmacy staff who are involved in the dispensing and supply of medicines must have the knowledge and skills of the relevant units of a nationally recognised Level 2 qualification¹, or are training towards this
- the importance of staff in managerial or leadership positions (who may or may not be a registered pharmacy professional) understanding that pharmacy professionals have a responsibility to prioritise patient safety

Please read the draft guidance in the next section for more information on how to apply the standards for registered pharmacies.

¹ This means that a person has knowledge and understanding of facts and procedures to complete well-defined tasks. They are aware of the range of information that is relevant to the area of work and can interpret information and ideas to inform actions. (Ofqual Level Descriptors, 2015)

This section shows the text of the proposed guidance

Registered pharmacies guidance: a safe and effective pharmacy team

1. About this guidance

Principle 2 of our **standards for registered pharmacies** sets out our clear expectations that ‘Staff are empowered and competent to safeguard the health, safety and wellbeing of patients and the public’.

This guidance gives further advice to pharmacy owners on how to meet this principle. It should be read with our standards for registered pharmacies, our supporting guidance², and our **Inspection decision making framework**. The main focus of this guidance is the pharmacy owner’s responsibility for unregistered pharmacy staff – staff in the pharmacy team who are not registered with the General Pharmaceutical Council (GPhC) but are involved in providing pharmacy services at or from a registered pharmacy.

Principle 2: Staff are empowered and competent to safeguard the health, safety and wellbeing of patients and the public

- 2.1. There are enough staff, suitably qualified and skilled, for the safe and effective provision of the pharmacy services provided
- 2.2. Staff have the appropriate skills, qualifications and competence for their role and the tasks they carry out, or are working under the supervision of another person while they are in training

Unregistered pharmacy staff work in a variety of roles including as dispensers, medicines counter assistants, delivery drivers and pharmacy managers. They may work full time, part time or just in holidays. Their responsibilities can include: providing information and advice on symptoms and products; selling and supplying medicines; receiving and collecting prescriptions, including assembling and dispensing prescribed items; delivering medicines; ordering, receiving and storing pharmaceutical stock; and leading and managing teams.

² The GPhC provides a range of guidance that supports the standards for registered pharmacies including Guidance for registered pharmacies providing pharmacy services at a distance, including on the internet and Guidance for registered pharmacies preparing unlicensed medicines.



2. Introduction

We recognise that the needs of people who receive care from pharmacy continue to evolve. Pharmacy services, and the roles required to deliver them, are developing to reflect this change. We want to strengthen the framework to make sure the pharmacy team are able to respond to the new challenges and opportunities they face.

How teams are governed, led and managed, and how individuals within teams work together, will have a significant impact on the quality of care received by patients and people using services from registered pharmacies.

These teams are often made up of registered pharmacy professionals – pharmacists and pharmacy technicians – and unregistered pharmacy staff. There is an important distinction between registered and unregistered pharmacy staff. Registered pharmacy professionals have obligations and responsibilities as regulated professionals. This involves meeting all the standards we set for education and training, continuing professional development, and professional conduct.

This is not the case for unregistered pharmacy staff who are not regulated by the GPhC and are primarily accountable to their employer. In the context of registered pharmacies, this will generally be the pharmacy owner. It is the pharmacy owner who is responsible for the impact their work has on patients and the public. To meet our standards and deliver the right outcomes for patients and people using pharmacy services, pharmacy owners will need to make sure registered and unregistered pharmacy staff can work safely and effectively.

Pharmacy owners must make sure that everyone in the pharmacy team is familiar with the standards and understands the importance of their being met. If the registered pharmacy is owned by a 'body corporate' (for example a company or an NHS organisation) the superintendent pharmacist also has that responsibility.

Those responsible for the overall safe running of the pharmacy must take into account the nature of the pharmacy, the range of services provided, the model of delivery – including whether, for example, services are delivered in person or at distance (eg online) – and, most importantly, the needs of patients and people who use pharmacy services.

3. Governance

Pharmacy owners are responsible for creating the right culture and environment in their pharmacies, both physical and organisational. But the pharmacy team – pharmacy professionals and unregistered pharmacy staff – also have an important role. Although the principles of good governance are consistent across all types of pharmacies, we recognise that pharmacies will be managed differently, in a style suitable for their structure and the services they provide.

It is vital to have appropriate governance arrangements to ensure the delivery of safe, high-quality pharmacy services and to monitor and improve standards of care. These cover everything from the systems, processes and controls used in a pharmacy, through to how risks are identified and managed – and acting when there are opportunities to do things in new and better ways.

Pharmacy owners must meet our standards for registered pharmacies and although there are a number of different ways to ensure good governance, pharmacy owners should make sure:

- staff numbers and roles are appropriate for the services provided and are systematically reviewed in line with changing services and workloads
- there are appropriate staffing plans in place to cover absence
- everyone in the pharmacy team knows what their duties and responsibilities are, and understands what the duties and responsibilities of other members of the team are
- unregistered pharmacy staff work within the limits of their competence and refer to pharmacy professionals when needed
- they are open to innovation and development of roles that are appropriate to how the pharmacy operates
- risk assessments, that are specific to the pharmacy and the team working there, are carried out and procedures are put in place to effectively manage risks
- everyone in the pharmacy team knows how to assess and reduce risks for the tasks they carry out
- everyone in the pharmacy team has the knowledge and confidence to raise concerns about safety, and make suggestions for improvement
- everyone in the pharmacy team understands the principles of privacy and confidentiality and is able to put these into practice
- everyone in the pharmacy team understands their responsibilities for keeping records up to date, complete and accurate, and for storing and sharing information in line with established procedures



4. Education and training requirements

All staff must be competent and appropriately trained for the role they carry out, or be in training for that role.

Pharmacy services, and the roles required to deliver them are changing due to a range of factors including societal change and patient needs. Education and training requirements for such a diverse workforce should be flexible and proportionate to allow the pharmacy team to respond to changes in professional practice.

Although there are a number of ways to make sure the pharmacy team have enough suitably qualified and skilled staff at all times to meet the needs of the people using the service, pharmacy owners should make sure:

- a role-specific induction is carried out for all new members of the pharmacy team
- they assess the competence of staff when they start in their role and make an informed judgement on what further knowledge or training they may need. This should include considering the staff member's previous education and training, qualifications held, and work experience, as well as monitoring their performance
- 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
- unregistered pharmacy staff who need further education and training to meet the required competency level for their role are enrolled on an appropriate training programme within three months of starting in their role
- all staff receive appropriate training to enable them to work effectively in their role, and remain under the supervision of another person while they are in training
- the needs of their patients and local communities are identified and staff are trained accordingly
- training covers a common set of skills and abilities including professionalism, good communication skills, and effective working in multi-professional teams
- they recognise and address differences in competency requirements for specific practice settings and for the types of services being delivered in that setting
- they have an understanding of relevant training provision so they can make decisions on what courses are appropriate for staff. This may include speaking directly to course providers about training needs
- they maintain complete and accurate records of training for all staff

5. Knowledge, skills and development

To maintain a competent and empowered pharmacy team, it is vital that learning and development continues beyond initial education and training. It is for owners and pharmacy professionals to encourage and enable reflection on performance, and identify learning and development needs. Staff should be empowered to use their judgement, make decisions where appropriate and be proactive in the interests of patients and the public.

Although there are a number of ways to make sure the skills mix of staff remains appropriate for the services provided by the pharmacy, pharmacy owners should make sure:

- the knowledge, skills and development of staff within their teams is appropriate for the services provided by the pharmacy
- essential elements of training are identified for each role within the team and these are proactively reviewed and reassessed, in response to changing needs and circumstances
- they can demonstrate that training has been carried out and is being put into practice
- individual and team development plans are in place to manage skills gaps
- they take a tailored approach to training which is continued throughout individuals' employment and that the knowledge and skills of pharmacy staff remain up to date
- all staff are encouraged to reflect on their performance, particularly those still in training, and that any learning and development needs are identified
- they have considered whether they can make protected time available for training



6. Maintaining a person-centred environment

Having staff with the right knowledge and skills is one part of being able to provide safe and effective care. It is equally important for the pharmacy team to demonstrate the attributes and qualities that people who use pharmacy services expect to see. It is often these interpersonal skills that can put patients at ease and make the difference to the care they receive.

Although there are a number of ways to encourage person-centred behaviour, pharmacy owners should make sure:

- the pharmacy team provides compassionate care which is adapted to meet the needs of each person
- the pharmacy team know how to establish an individual's communication and language needs
- the pharmacy team can adjust their style of communication, and recognise and reduce barriers to effective communication
- the pharmacy team are able to identify people who may be vulnerable and act where necessary
- the pharmacy team helps individuals to make informed choices about their health and wellbeing
- the pharmacy team works with other healthcare providers to provide 'joined-up' care for the benefit of patients
- people who use pharmacy services can easily see who staff are and the role they are carrying out

7. Management and leadership roles

There is also an important role for managers who have responsibility for leading and managing teams, and for co-ordinating many aspects of the day-to-day pharmacy operations. Staff in managerial or leadership positions – who may or may not be registered pharmacy professionals – have significant influence over the culture, practices and environment of the pharmacy business, and the delivery of pharmacy services.

Although there are a number of ways to make sure managers understand their responsibilities and the responsibilities of the rest of the pharmacy team, pharmacy owners should make sure:

- managers understand how to manage appropriately any personal or organisational goals, incentives or targets without compromising safe and effective care
- there are appropriate processes for assessing that managers have the competence, skills and experience needed, to carry out their role
- managers understand the legal and regulatory framework in which they are working and the contractual responsibilities of their employer
- managers understand that the pharmacists and pharmacy technicians they manage have obligations and responsibilities as regulated pharmacy professionals, and are accountable to the GPhC
- managers understand that pharmacy professionals must make patient safety a priority and take action to protect the wellbeing of patients and the public
- pharmacy professionals are supported and empowered to handle challenging situations confidently and professionally, whether that means having the right conversations with managers or knowing that when a concern is raised, action will be taken as appropriate
- managers make sure the pharmacy team know and understand the procedures in place in the pharmacy

8. Pharmacy professionals

This guidance is intended to help pharmacy owners. However, individual pharmacy professionals also have important responsibilities in respect of the pharmacy team.

In our [standards for pharmacy professionals](#), standard 9 says:

Pharmacy professionals must demonstrate leadership

Applying the standard

Every pharmacy professional can demonstrate leadership, whatever their role. Leadership includes taking responsibility for their actions and leading by example. Wherever a pharmacy professional practises, they must provide leadership to the people they work with and to others. There are a number of ways to meet this standard and below are some examples of the attitudes and behaviours expected.

People receive safe and effective care when pharmacy professionals:

- take responsibility for their practice and demonstrate leadership to the people they work with
- assess the risks in the care they provide and do everything they can to keep these risks as low as possible
- contribute to the education, training and development of the team or of others
- delegate tasks only to people who are competent and appropriately trained or are in training; and exercise proper oversight
- do not abuse their position or set out to influence others to abuse theirs
- lead by example, in particular to those who are working towards registration as a pharmacy professional

There is an important dual responsibility between pharmacy owners and pharmacy professionals to make sure that any member of staff involved in the sale and supply of medicines has the knowledge and skills to carry out their tasks safely and effectively.

Pharmacy professionals should be able to satisfy themselves that anyone they delegate a task to is competent and appropriately trained to carry out the task. They should make sure unregistered pharmacy staff understand what they cannot and must not do, and know when to refer to a pharmacy professional.

Pharmacy professionals should encourage staff to ask patients appropriate questions and to actively listen to make sure they are giving suitable advice. To improve the quality of services and care, pharmacy professionals should encourage the pharmacy team to record, review and learn from mistakes or incidents.

It is important for pharmacy professionals to review the progress of staff they manage or oversee (for example, by way of appraisal), give honest and constructive feedback, and take reasonable steps to deal with any concerns within the pharmacy team.



9. Other sources of information

You can get more information from professional bodies, education providers and other independent bodies. Below are some possible sources of information and guidance:

Royal Pharmaceutical Society (RPS) accredited training and providers

www.rpharms.com/professional-development/accredited-events-and-training

The Centre for Pharmacy Postgraduate Education (CPPE)

www.cppe.ac.uk

Wales Centre for Pharmacy Professional Education (WCPPE)

www.wcppe.org.uk

Care Quality Commission (CQC) – Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: Regulation 5 (fit and proper persons)

www.cqc.org.uk/content/regulations-service-providers-and-managers

The Scottish Qualifications Authority (SQA)

www.sqa.org.uk/sqa/66814.html

City and Guilds

www.cityandguilds.com

Pearsons

qualifications.pearson.com/en/home.html

Boots UK

www.boots-uk.com

Buttercups Training

www.buttercupstraining.co.uk

CIG Healthcare Partnership

www.counter-intelligence.co.uk

National Pharmacy Association (NPA)

www.npa.co.uk

Scientia Skills

www.scientiaskills.co.uk

Mediapharm

www.mediapharm.co.uk

How we will use your responses

After the consultation, we will publish a report summarising what we heard.

Responding as an individual

If you respond as a private individual, we will not list your name in the published report or publish your response.

Occasionally, the GPhC may need to disclose information under the laws covering access to information (usually the Freedom of Information Act 2000). On these rare occasions, the GPhC will usually anonymise responses or ask for consent from respondents, but please be aware that we cannot guarantee confidentiality.

Responding on behalf of an organisation

If you respond on behalf of an organisation, we will list your organisation's name and may publish your response in full unless you tell us not to. If you want any part of your response to stay confidential, you should explain why you believe the information you have given is confidential.

Occasionally, the GPhC may need to disclose information under the laws covering access to information (usually the Freedom of Information Act 2000). On these rare occasions, the GPhC will usually anonymise responses or ask for consent from respondents, but please be aware that we cannot guarantee confidentiality.

Consultation Response form

Response to the consultation on guidance to ensure a safe and effective pharmacy team

Background questions

First, we would like to ask you for some background information. This will help us to understand the views of specific groups, individuals and organisations and will allow us to better respond to those views.

Are you responding:

- as an individual – please go to section A
- on behalf of an organisation – please go to section B

Section A – Responding as an individual

Please tell us your:

name:

address:

email:

Where do you live?

- England
 - Scotland
 - Wales
 - Northern Ireland
 - other (please give details)
-

Are you responding as:

- a member of the public
 - a pharmacy professional – please go to section A1
 - a pre-registration trainee
 - a student
 - other (please give details)
-

Section A1 – Pharmacy professionals

Are you:

- a pharmacist
- a pharmacy technician
- a pharmacy owner

Please choose the option below which best describes the area you mainly work in:

- community pharmacy
 - hospital pharmacy
 - primary care organisation
 - pharmacy education and training
 - pharmaceutical industry
 - other (please give details)
-

Section B – Responding on behalf of an organisation

Please provide a brief description of what your organisation does and its interest in this particular consultation:

Please tell us your:

name: _____

job title: _____

organisation: _____

address: _____

email: _____

a contact name for enquiries: _____

Please choose the option below which best describes your organisation:

- organisation representing patients or the public
- organisation representing pharmacy professionals or the pharmacy sector
- independent pharmacy (1-5 pharmacies)
- Multiple pharmacy (6 or more pharmacies)
- NHS organisation or group
- research, education or training organisation
- other (please give details)

If you want any part of your organisation's response to stay confidential, please explain why you think the information you have given is confidential. We cannot give an assurance that confidentiality can be maintained in all circumstances.

- Please keep parts of my organisation's response confidential

Please explain which parts you would wish to keep confidential and why:



Consultation questions

We recognise the need for flexible and modern education and training which can reflect the different requirements across sectors. There is a clear role for owners and pharmacy professionals in building teams that cut across traditional boundaries and in ensuring the safe and effective practice of their pharmacy teams.

We are particularly interested in your views on the following points, although we welcome your comments on any issues that you want to raise about the draft guidance to ensure a safe and effective pharmacy team.

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.

1. Do you agree with the proposed approach?

Yes No

Please explain your reason for this.

Draft guidance

We have 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

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

Yes No

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

Training requirements

We want to make sure that appropriate training is provided for all staff so that patients receive quality care. Our 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.

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

Yes No

Please explain your reason for this.

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.

5. **Do you agree with our proposed approach?**

Yes No

Please explain your reasons for this.

Impact

We want to know how the proposed changes to the framework for the education and training of unregistered pharmacy staff may affect pharmacy owners, pharmacy professionals, unregistered pharmacy staff, and people using pharmacy services.

6. **What impact do you think the proposals will have on *pharmacy owners*?**

No impact

Mostly positive

- Partly positive
- Positive and negative
- Partly negative
- Mostly negative

7. What impact do you think the proposals will have on *pharmacy professionals*?

- No impact
- Mostly positive
- Partly positive
- Positive and negative
- Partly negative
- Mostly negative

8. What impact do you think the proposals will have on *unregistered pharmacy staff*?

- No impact
- Mostly positive
- Partly positive
- Positive and negative
- Partly negative
- Mostly negative

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

- No impact
- Mostly positive
- Partly positive
- Positive and negative
- Partly negative
- Mostly negative

10. Do you have any other comments?

We believe the guidance to ensure a safe and effective pharmacy team should have positive implications for people. We have 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.

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

- Yes No

If 'Yes', please explain and give examples.

More information

We would like to email respondents to update them on progress on this consultation as well as other work of the GPhC. Please tell us below if you would like to be contacted in the future.

- I would like to be contacted with updates related to the consultation on guidance to ensure a safe and effective pharmacy team.
- I would like to be contacted with news and information about other consultations from the GPhC.

Equality monitoring

At the GPhC, we are committed to promoting equality, valuing diversity and being inclusive in all our work as a health professions regulator, and to making sure we meet our equality duties.

We want to make sure everyone has an opportunity to respond to our consultation on guidance to ensure a safe and effective pharmacy team. This equality monitoring form will provide us with useful information to check that this happens.

Your responses will not be analysed together with your consultation questions. You do not have to answer these questions if you would prefer not to.

What is your sex?

Please tick one box

- Male
- Female
- Other

What is your sexual orientation?

Please tick one box

- Heterosexual/straight
- Gay woman/lesbian
- Gay man
- Bisexual
- Other
- Prefer not to say

Do you consider yourself disabled?

Disability is defined in the Equality Act 2010 as “physical or mental impairment, which has a substantial and long term adverse effect on a person’s ability to carry out normal day to day activities”. Please tick one box.

- Yes
- No
- Prefer not to say

What is your age group?

Please tick one box

- 16 – 24 years
- 25 – 34 years
- 35 – 44 years
- 45 – 54 years
- 55 – 64 years
- 65 + years

What is your ethnic group?

Choose the appropriate box to indicate your cultural background. Please tick one box.

White

- British
- Irish
- Gypsy or Irish traveller

- Other white background (please fill in the box at the end of this section)

Black or Black British

- Black Caribbean
- Black African
- Other black background (please fill in the box at the end of this section)

Mixed

- White and black Caribbean
- White and black African
- White and Asian
- other mixed background (please fill in the box at the end of this section)

Asian or Asian British

- Indian
- Pakistani
- Bangladeshi
- other Asian (please fill in the box at the end of this section)

Chinese or Chinese British

- Chinese or Chinese British
- Other ethnic group (please fill in the box at the end of this section)

Arab

- Arab

Other

- Prefer not to say
- Other ethnic group background (please give more information in the box below)

What is your religion?

Please tick one box

- Buddhist
- Christian
- Hindu
- Jewish
- Muslim
- Sikh
- None
- Other (please give more information in the box below)
- Prefer not to say

Appendix A: Collated consultation questions

The new framework will make it clear that the pharmacy owner is accountable for making sure unregistered pharmacy staff are competent for their roles

1. Do you agree with the proposed approach?
Yes / No
Please explain your reasons for this.
2. Does the proposed guidance adequately cover the key areas to ensure a safe and effective team?
Yes / No
3. Is there anything else not covered in the guidance that you would find useful?
Please give details.
4. Do you agree with the minimum level of competence for unregistered pharmacy staff who are involved in dispensing and supplying medicines?
Yes / No
Please explain your reasons for this.

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.

5. Do you agree with our proposed approach?
Yes / No
Please explain your reasons for this.

6. What impact do you think the proposals will have on pharmacy owners?
No impact
mostly positive
partly positive
positive and negative
partly negative
mostly negative
7. What impact do you think the proposals will have on pharmacy professionals?
No impact
mostly positive
partly positive
positive and negative
partly negative
mostly negative
8. What impact do you think the proposals will have on unregistered pharmacy staff?
No impact
mostly positive
partly positive
positive and negative
partly negative
mostly negative
9. What impact do you think the proposals will have on people using pharmacy services?
No impact
mostly positive
partly positive
positive and negative
partly negative
mostly negative

10. Do you have any other comments?
11. Do you think the proposals might have an impact on certain individuals or groups who share any of the protected characteristics?

Yes / No

If 'Yes', please explain and give examples.



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