

27 September 2023

Department of Health and Social Care, by email.

The use of patient group directions by pharmacy technicians: Submission from the General Pharmaceutical Council

As 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 that pharmacy professionals must 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 or to uphold public confidence in pharmacy
- 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 proposals for the use of patient group directions (PGDs) by pharmacy technicians. In principle, we support legislation that enables the optimal contribution of pharmacy technicians, allowing effective use of pharmacists and a wider skill mix in pharmacy teams.

As the regulator, patient safety is our highest priority. The legal structure provided by PGDs allows for a safe supply and/or administering of medicines to a pre-defined group of people. The addition of pharmacy technicians to the list of healthcare professionals permitted to supply and/or administer under a PGD will allow them to supply and/or administer medicines through a framework which defines responsibilities for ownership and has clear governance arrangements.

Furthermore, PGDs specifically define additional training requirements. Training is key; technicians who work in different settings may have varying levels of experience and confidence and need additional support initially.

A pharmacy technician's knowledge and skills will develop over the course of their career and needs to reflect the changing nature of healthcare, the population they provide care to and the roles they carry out. They must also carry out a range of continuing professional development (CPD) activities relevant to their practice.

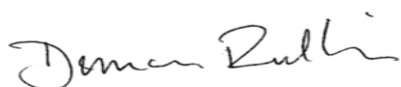
Pharmacy technicians are professionally accountable to meet our standards; when a pharmacy technician makes a clinical decision within a properly authorised PGD, the pharmacy technician is responsible for, and accountable to the regulator, for providing person-centred care; for obtaining consent; for giving the patient all the relevant information in a way they can understand, so the patient can make informed choices. Furthermore, a pharmacy technician working under a PGD must recognise and work within the limits of their knowledge and skills, and refer to others when needed. They must apply their own professional judgement, and make sure that person-centred care is not compromised by their personal values and beliefs.

Pharmacists form part of multi-professional teams who develop PGDs. They have a responsibility to make sure that the PGD meets the relevant legal, governance and professional requirements and allow for the safe and effective supply and administration of medicines by pharmacy technicians.

We understand that this proposal for the use of PGDs by pharmacy technicians is just one of the many planned measures to make full use of pharmacy technician knowledge and skills and free up pharmacist time to deliver more clinical services. We believe that comprehensive engagement with pharmacy technicians will be important to fully understand the impact of this proposal on what they do and if any additional support may be needed.

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 us on the details below.

Yours sincerely,



Duncan Rudkin
Chief Executive and Registrar