

NHS Improvement consultation on developing a patient safety strategy for the NHS

GPhC Consultation Response

Introduction

1. The General Pharmaceutical Council (GPhC) regulates pharmacists, pharmacy technicians and pharmacies in Great Britain. Our role is to protect the public and give them assurance that they will receive safe and effective care when using pharmacy services.
2. We welcome the opportunity to respond to the NHS Improvement consultation on developing a patient safety strategy for the NHS. We agree, in principle, with the strategic policy principles (of a just culture, openness and transparency and continuous improvement), as set out in the consultation document and broadly support the aims that the consultation is seeking to achieve.
3. We believe a patient safety strategy underpins a person's right to expect safe and effective care from all healthcare settings including pharmacy. Pharmacy professionals play a key role in delivering care and helping people to maintain and improve their health, safety and wellbeing. Regardless of the challenges presented in terms of economic uncertainty and funding challenges seen in the wider NHS and pharmacy services we have an important role to play working with governments, patients, pharmacy professionals, employers and others to ensure patient safety.
4. We have a statutory purpose to protect patients by setting and upholding standards for individual pharmacists and pharmacy technicians and for registered pharmacies. We engage with patients and the public when developing our policies and guidance, to make sure that what matters to them including patient safety is reflected in our standards and guidance.
5. Our standards for pharmacy professionals describe how safe and effective care is delivered through 'person-centred' professionalism. We believe it is the attitudes and behaviours of pharmacy professionals in their day-to-day work which make the most significant contributions to the quality of care, of which safety is a vital part.
6. Our standards for registered pharmacies create and maintain the right environment, both organisational and physical, for the safe and effective practice of pharmacy. Pharmacy owners are responsible for ensuring patient safety. We believe it is important that all members of the pharmacy team are empowered to safeguard the health, safety and wellbeing of patients and the public and play their part in doing this. Our guidance to ensure a safe and effective pharmacy team highlights the importance of the culture and processes within the pharmacy in helping to deliver safe and effective care to patients and the public.

This includes making sure there are enough skilled and qualified staff to provide safe and effective pharmacy services.

7. Our fitness to practise process also protects patient safety and maintains public confidence in pharmacy professionals, and considers any future risks to patients and the public.

Q.1. Principles

A just culture

8. Pharmacy professionals are well placed to deliver patient safety measures including identifying and correcting errors as well as supporting patients to take their medication safely. Every pharmacy professional has a duty to raise any concerns about individuals, actions or circumstances that may be unacceptable or that could result in risks to people receiving care and public safety, as well as empowering other members of the pharmacy team to raise concerns. Our guidance on raising concerns highlights the importance of raising concerns.
9. Recent changes to the law, such as the decriminalisation of inadvertent dispensing errors in registered pharmacies, may encourage pharmacy professionals to speak up about poor practice. We recognise it supports a learning culture, as it removes a barrier for those working in registered pharmacies to improved reporting and learning. We look forward to the outcomes from the government's recent consultation on removing the threat of criminal sanctions for dispensing errors made by pharmacists, and pharmacy technicians, working in settings other than registered pharmacies.

Openness and transparency

10. We agree that learning from events and inquiries is important to inform our work. It is embedded in all we do to help us ensure people receive safe, effective and compassionate care and to underpin a safety culture. We believe that it is vital to have a learning culture across healthcare. We continue to work to promote a culture of openness, honesty and learning across pharmacy, and encourage everyone who employs pharmacy professionals or works within pharmacy to do the same. Openness and transparency were key elements considered when we reviewed our standards for pharmacy professionals, our initial education and training standards and our fitness to practise proceedings.
11. We have joined together with other pharmacy organisations to publish a reflection and learning resource to support everyone across the pharmacy to learn the lessons from the Gosport Independent Panel report. The resource emphasises that pharmacy practice has improved significantly since these incidents took place, including through strengthened professional requirements, the introduction of the duty of candour, improved oversight of controlled drugs, and closer working across the multi-disciplinary team. It is important to reflect and learn from what happened to make sure that these failures in care are never repeated and that patient safety remains the main priority for all pharmacy professionals.

Continuous improvement

12. We agree with the proposed principle of continuous improvement. Through our **work** we help to promote professionalism, support continuous improvement and assure the quality and safety of pharmacy. At the heart of our approach to inspections is a focus on driving improvement in patient safety and the care people receive from pharmacies. Our inspections provide assurance to people using pharmacy services, that our standards for registered pharmacies are being met. This was reflected in a **study** we carried out about registered pharmacies and our inspection model.

Q.2. Insight

Insight

13. We recognise that using data is invaluable in informing and promoting a safety culture and informing regulation. We are uniquely placed to use our privileged position to capture and share data, research and information which helps us to better understand risk in pharmacy and helps us to enable and encourage improvement in the sector. It also helps us provide assurance to patients and the public.

Q.3. Infrastructure

Infrastructure

14. We note you propose a universal curriculum for all staff. This may be better reflected by individual regulators embedding it into their own learning outcomes and education standards for all members of the pharmacy team. In order to produce the curriculum, we suggest that you engage widely with the health professional education/regulation sector and across the NHS if you are to achieve consistency in this area.
15. We welcome this consultation as it supports our aims, including in the continuing development of our education and training for pharmacy professionals and support staff. In our education standards, we are considering patient safety in the following two areas:
 - In our requirements to course providers, who must ensure that the delivery of a course does not jeopardise patient safety (for example, Standard 1 of the current initial education and training of pharmacists standards)
 - In the learning outcomes that students must achieve in order to qualify (for example, learning outcome 18 of the revised initial education and training of pharmacy technicians standards)
16. We believe the safety of people must be central to the education and training of pharmacy professionals (pharmacists and pharmacy technicians) across all learning environments and is at the heart of **our standards**. Public and patient safety is not a separate requirement- it is

embedded in all our initial education and training standards and criteria for pharmacy professionals. We also expect course providers and employers to prioritise public and patient safety in all aspects of the course and its delivery.

17. It is worth noting that our standards (and those of other regulators) are strongly embedded through healthcare professional training already. We:
 - support measures to improve understanding of patient safety amongst all staff and the visibility of patient safety in education and training
 - place patient safety as the core organising principle in the education of most regulated healthcare professionals including pharmacy professionals
18. We are currently consulting on our proposed new initial education and training for pharmacists (IETP) standards. The revised standards propose several changes, many of which aim to improve patient safety. Public and patient safety is built into the proposed learning outcomes, and employers and education providers will continue to be required to prioritise public and patient safety in all aspects of the curriculum and its delivery
19. We also set requirements for the training of pharmacy support staff; this covers:
 - how to work safely within their role following procedures and governance required for patient safety
 - recognising and working within the limitations of the role
 - the application of health and safety policies in their role
20. We are also in the process of reviewing the coverage of skills and behaviours for patient-centred care in our requirements for support staff.
21. How the patient safety curriculum is delivered is an important question, and we would be interested to hear the proposals. For example, would the delivery be through a post-IET training offered to health and care professionals after they have been recruited by the NHS?

Q.4. Initiatives

Initiatives

22. We want to play our part where we can to develop programmes to support the sector to continue to reduce harm. We will shortly be publishing guidance on making sure patients and the public obtain medicines and other pharmacy services safely online. As part of this, we have included four categories of medicine, including anti-microbial medicines, that are not suitable to be supplied online unless further safeguards have been put in place. This is to make sure that they are clinically appropriate.