

Patient Safety Commissioner Consultation Team
Department of Health and Social Care
39 Victoria Street,
London
SW1H 0EU
By email: ConsultationPSC@gov.uk

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General Pharmaceutical Council response to the consultation on the appointment and operation of the Patient Safety Commissioner

The General Pharmaceutical Council (GPhC) regulates pharmacists, pharmacy technicians and pharmacies in Great Britain. Our main role is to protect, promote and maintain the health, safety and wellbeing of members of the public by upholding standards and public trust in pharmacy.

We have a number of ways in which we do this including;

- registering and listing publicly the pharmacy professionals and pharmacies that provide care to patients and the public;
- setting and promoting the standards needed to enter and stay on our register;
- receiving assurances, in several ways, that pharmacy professionals and pharmacies continue to uphold our standards and acting appropriately when they do not;
- sharing with others what we learn through our work; and
- investigating concerns about the people or pharmacies we register and taking proportionate action to protect the public and promote our standards

We recognise that this consultation is seeking views on the legislative details of the appointment and operation of the Patient Safety Commissioner for England, including terms of office for the role, remuneration and funding. While we cannot comment on this level of detail, we welcome and support the introduction of a Patient Safety Commissioner Role for England as defined in the Medicines and Medical Devices Act 2021.

The desire for an independent public leader with statutory responsibility who champions the value of listening to patients and seeking improvements to patient safety aligns to our **Strategic Plan 2020-25** in which person centred care is one of our key operating principles at the centre of the way we work.

In the same way that this role has emerged following the Independent Medicines and Medical Devices Safety Review (IMMDS Review) recommendations, we have also considered the report carefully and we are committed to strengthening how patient voices are heard. Most notably, and relevant to this work, we have taken action regarding sodium valproate and patient safety which has included;

- working with the Independent Foetal Anti-Convulsant Trust (INFACT) to develop a patient safety video;
- wide promotion of the **MHRA's Pregnancy Prevention Programme (PPP) for sodium valproate** to ensure pharmacy professionals are well informed on the safety aspects of this medication;
- specific reference on how to monitor the safe supply of sodium valproate in our, '**Guidance for registered pharmacies providing pharmacy services at a distance, including on the internet**';
- regular information updates and blog posts via the **GPhC website** to help improve patient, public and registrant understanding of the safety aspects of this medication; and,
- publishing **an example** of notable pharmacy practice on supporting people taking sodium valproate.

There are a wide range of organisations that have a role in supporting patients' voices across the health and care system. The GPhC is one part of this wider patient safety system and works to ensure that people receive safe and effective care from pharmacy and that public trust in pharmacy is maintained. If we are to be successful, we must work alongside the people using pharmacy services, pharmacy leaders, other regulators, and the wider health and care sector.

We understand that the Commissioner will not be responsible for, or have the ability to investigate, individual cases. However, we acknowledge that through the course of their work, the Commissioner may receive evidence which highlights a particular concern or may suggest impaired fitness to practise on the part of a healthcare professional. If such a situation were to arise, and for the purpose of public protection where appropriate to do so, it would be necessary to ensure that the relevant information was communicated in a timely manner to the appropriate regulatory body, to enable it to investigate these concerns further. Equally, during the course of our own investigations, we may in turn identify thematic issues that we believe would need to be highlighted to the Commissioner.

We recognise that the Commissioner's functions will allow them to proactively interreact with other providers and public bodies and so complement and enhance the existing system. We also note the information sharing requirements, as defined in Schedule 1 of the Medicines and Medical Devices Act 2021. We support these objectives and we want to develop a co-operative and collaborative working relationship with the Commissioner, in the interest of patient safety. We are interested to learn more about the future consultation on the principles that will govern the way in which the Commissioner will carry out their core duties in due course.

We look forward to working in partnership with the Commissioner going forward, to improve the safety of patients in relation to medicines and medical devices across the whole system, including in pharmacy.

Yours sincerely,

Laura McClintock

Laura McClintock
Chief of Staff / Associate Directorate of Corporate Affairs