

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

Introduction

We have powers to register fit, proper and suitably experienced people to act as pharmacists and pharmacy technicians on a temporary basis 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.

Policy purpose

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.

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.

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.

It is important to note that we do not have powers to **require** people who are temporarily registered to return to practise and recognise that people would be doing so on a voluntary basis to help their community, taking account of their own experience and health.

Policy statement

Our approach is based on the need to maximise the number of fit, proper and suitably experienced people while minimising risks to patient safety. We need to act quickly and implement a simple and straightforward plan which minimises delay and is easy to understand.

On declaration of an emergency by the Secretary of State, our priority will be to temporarily register those people who have previously demonstrated the required knowledge and skills to practise as a pharmacist or pharmacy technician and who have recent experience of pharmacy practice.

Registration will be done in phases which may be combined depending on the scale of the emergency and the pharmacy services required. In terms of recent experience, we will set out in each phase the relevant number of years that a person has been off the register to ensure clarity and will consider

whether the number of years may need to be increased in further phases depending on the scale of the emergency and an assessment of patient safety.

On the declaration of an emergency by the Secretary of State, the registrar may register the following groups for the duration of the emergency:

Phase 1

Pharmacist registration (Part 1 of the register)

Former pharmacist registrants who were recently voluntarily removed and whose fitness to practise is not impaired.

Pharmacy technician registration (Part 2 of the register)

Former pharmacy technician registrants who were recently voluntarily removed and whose fitness to practise is not impaired

Phase 2

Pharmacist registration (Part 1 of the register)

Former pharmacist registrants who were recently removed for non-renewal of registration and whose fitness to practise is not impaired

Pharmacy technician registration (Part 2 of the register)

Former pharmacy technician registrants who were recently removed for non-renewal of registration within the last two years and whose fitness to practise is not impaired

Additional phases

In an emergency, we recognise that there may be a demand for additional categories of people to be registered temporarily or to temporarily annotate entries. This may mean including people who have demonstrated many, but not all, of the required knowledge and skills or who have less recent experience of pharmacy practice. We will maintain close contact with the UK Government and Devolved Administrations to identify whether any further categories of people may need to be registered or annotated.

Standards

All persons entered temporarily on the register will be required to meet the standards for pharmacy professionals. As part of this, they will be required to work within their areas of competence and make clear to their employer if there are specific tasks or practices that they do not feel competent to undertake, perhaps due to developments that have taken place in pharmacy practice since their previous removal from the register.

Employers

Employers and service providers remain responsible for carrying out appropriate checks before employing or deploying temporarily registered workers. This includes ensuring that adequate professional indemnity is in place. And making sure that temporarily registered workers are competent for role, and are appropriately inducted, trained and supervised. Owners of registered pharmacies must

continue to meet the standards for registered pharmacies, including in respect of temporarily registered staff.

Policy application

On declaration of emergency we will enact the policy by publishing the temporary register on our website enabling the individuals themselves and employers to check eligibility. We will produce short guidance for employers to ensure they are aware of their responsibilities for confirming the identity of individuals and to ensure that issues such as indemnity insurance are appropriately addressed. We will use our communication channels to provide information to registrants, patients and the public and others about temporary registration before, during and after an emergency

Measurement and evaluation

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.

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.

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.

GPhC
March 2020