

Healthcare Quality Division
Health and Social Services Group
Welsh Government
Cathays Park
Cardiff
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Friday, 29 September 2017

Re: Services Fit for the Future, a Welsh Government White Paper consultation – Response from the General Pharmaceutical Council

The General Pharmaceutical Council (GPhC) is the independent regulator for pharmacists, pharmacy technicians and pharmacy premises in Great Britain. 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 principal functions include:

- approving qualifications for pharmacists and pharmacy technicians and accrediting education and training providers;
- maintaining a register of pharmacists, pharmacy technicians and pharmacy premises;
- setting standards for conduct, ethics, proficiency, education and training, and continuing professional development (CPD);
- establishing and promoting standards for the safe and effective practice of pharmacy at registered pharmacies;
- establishing fitness to practise requirements, monitoring pharmacy professionals' fitness to practise and dealing fairly and proportionately with complaints and concerns.

We are a statutory organisation set up by the UK and Scottish parliaments, and we are independent from government and those we regulate. Our role and functions are set out in legislation called the Pharmacy Order. We are funded by fees paid by the pharmacists, pharmacy technicians and pharmacies that register with us.

We have limited our response to comments where we feel our work is directly relevant to the proposals. We are happy to continue to contribute to future discussion and work in this area.

2.2. Duty of Candour The Welsh Government believes that the development of a statutory duty of candour across health and social services in Wales would consolidate existing duties and be in the interests of a person centred system. Do you support this proposal? What further issues would you want us to take into account in firming up this proposal?

We know that health professionals being open and honest when things go wrong is one of the best ways to protect patients. We believe a culture of openness across healthcare is critical to improving safety and ensuring a greater focus on transparency, speaking up and learning from mistakes.

Along with eight other regulators of healthcare professionals, we have signed a joint statement on openness and honesty - the professional duty of candour. This statement reflects the GPhC's requirement that pharmacists and pharmacy technicians need to be open and transparent at all times, and serves as a reminder that candour is an essential duty for all professionals.

It reminds all healthcare professionals, including pharmacists and pharmacy technicians, that they must be open and honest with patients when something goes wrong with their treatment or care which causes, or has the potential to cause, harm or distress. It is also a reminder of a duty to be open and honest with colleagues, employers and any other relevant organisations, including us as the regulator, and to raise concerns as appropriate.

Although it may be expressed in different ways within our statutory guidance, this common professional duty clarifies what we require of all the professionals registered with the eight regulators, wherever they work across the public, private and voluntary sectors.

The GPhC would support work to strengthen and embed candour across all healthcare settings and staff, and would be keen to see any new duty work with existing professional standards and guidance.

3.1. Setting and Meeting Common Standards The Welsh Government believes there should be a common set of high level standards applied to health and social care and that the standards should apply regardless of the location of care. Do you support this proposal? What further issues would you want us to take into account in firming up this proposal?

The GPhC sets standards for pharmacy professionals and registered pharmacies in Great Britain. These standards help to make sure people using pharmacy services receive safe and effective care. We set standards in five areas:

Standards for pharmacy professionals

Standards for registered pharmacies

Continuing professional development (CPD)

Standards for the initial education and training for pharmacists

Standards for the initial education and training for pharmacy technicians

The standards for pharmacy professionals have recently been revised. The nine standards describe how safe and effective care is delivered through person-centred professionalism. They emphasise: person-centred care; demonstrating leadership; and greater accountability on the part of pharmacy professionals. They apply to all pharmacy professionals regardless of setting or location of care.

The standards provide a framework to help registrants when making professional judgements. Pharmacy professionals must work in partnership with everyone involved, and make sure the person they are providing care to is their first priority. However, we know that there are times when pharmacy professionals are faced with conflicting legal and professional responsibilities. Or they may be faced with complex situations that mean they have to balance competing priorities. Therefore, we would welcome a common set of high level standards across health and social care, which worked in support of existing professional standards and ensured consistent outcomes for patients.

3.2. Joint Investigation of Health and Social Care Complaints

The Welsh Government believes that requiring different organisations to work together to investigate complaints will make it easier for people to complain when their complaint is about both health and social services. We also believe it will encourage organisations to learn lessons to improve their services. Do you support this proposal? What further issues would you want us to take into account in firming up this proposal?

We are one part of a complex system for overseeing and improving the quality of pharmacy care and services. We work collaboratively with a wide range of professionals, regulatory and oversight bodies in Wales to ensure safe and effective provision of pharmacy services. We also work closely with the government. We have set up Memoranda of Understanding (MoUs) with a number of organisations in Great Britain including Healthcare Inspectorate Wales and NHS Counter Fraud Services Wales. The MoUs are formal arrangements that set out how we work together and they help us to share information and intelligence and to avoid duplicating work.

In all areas of our work we understand that effective joint working with partner organisations and other regulators is essential. The GPhC wishes to build and use intelligence networks and effective operational partnerships with other regulators throughout Great Britain to identify and tackle risk. We also want to use the data and information we capture from our inspections and other regulatory functions to help inform and drive continuous improvement at a national and local level. We would therefore welcome work to strengthen intelligence gathering and sharing mechanisms with other bodies and to develop closer working across other scrutiny agencies. We would wish to play our part in future arrangements of this nature and to further develop and formalise collaborative working arrangements with other organisations

If we can be of any further help please do not hesitate to contact us

Yours Sincerely,

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Director for Wales

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