Dear Sir/Madam,

Building on strong foundations: feedback

We welcome the opportunity to respond to CQC’s Building on strong foundations: Shaping the future of health and care quality regulation paper. Whilst the document as a whole is of interest to us, we have limited our response to general feedback on areas where we have an interest because of our own regulatory work.

We fully support CQC’s commitment to high quality regulation, focused on encouraging improvement and which is “able to promote and deliver safe, effective and compassionate quality care for users of health and care services and their families”. We are also mindful of the growing challenges in healthcare requiring regulators to deliver these commitments in the most effective and efficient way possible. This is in line with our own strategic aims, as set out in our Strategic plan for 2016–19.

About the GPhC

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacies in Great Britain. It is our role to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmacy services in England, Scotland and Wales.

We have a statutory role in relation to ‘system’ regulation as we regulate the provision of services by registered pharmacies, as well as the professional regulation of pharmacists and pharmacy technicians.
General comments

As the regulator for registered pharmacies, we are interested to learn from CQC’s approach. We are also interested in the proposals described as many of our professional registrants – pharmacists and pharmacy technicians – work in settings regulated by the CQC.

Much of what the CQC is proposing is broadly consistent with our thinking around the regulation and inspection of registered pharmacies.

Working with others

We support CQC’s intention to work more collaboratively with others, including providers and partner organisations, to ensure that sustainable quality improvement becomes a reality. This is also in line with the government’s red-tape challenge for reducing regulatory burdens by removing overlapping regulation and working more effectively with others.

For the past two years the GPhC has held Memoranda of Understanding (MoUs) with partner organisations, including the CQC, which have enabled effective communication and cooperation between regulators and other organisations. Our MoU with the CQC has allowed us to share relevant information and to liaise around specific issues, as well as to carry out joint work – for example, joint investigation/joint inspection by inspectors from both organisations. We would welcome the opportunity to further build on existing relationships.

Smarter monitoring and use of data

We welcome CQC’s commitment to better use data, in combination with feedback from people who use services. We would be interested to learn from CQC’s experience of developing and extending the Intelligent Monitoring approach.

Co-regulation

The GPhC is keen to encourage learning and sharing of good practice among registered pharmacies. We expect that this will be easier once the GPhC gains statutory powers to publish inspection reports.

If the CQC do move towards a co-regulatory approach, as described in the Building on strong foundations paper, we would be interested in learning from your experiences and the impact on settings.
Responsive and tailored inspection

We welcome CQC’s intention to move to a more responsive and tailored inspection approach. This resounds with our own intention to implement tailored inspections more informed by risk, following an ongoing review of our prototype inspection approach and rating system.

Assessing how organisations work together to provide integrated patient care

The GPhC is interested in how organisations work together to provide integrated patient-centred care, particularly in relation to the contribution of registered pharmacies. From our inspections we are aware of examples of successful cooperation between pharmacies and other health and social care providers which contributes to the delivery of high quality patient care and to improved patient outcomes.

Yours faithfully,

Duncan Rudkin
Chief Executive & Registrar