

NHS
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6 May 2016

Dear sir/madam

Freedom to speak up in Primary Care: Guidance to primary care providers on supporting whistleblowing in the NHS

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

We have a statutory role in relation to 'system' regulation (as we regulate registered pharmacies) as well as 'professional' regulation of individual pharmacists and pharmacy technicians. Our main work includes:

- setting standards for the education and training of pharmacists, pharmacy technicians and pharmacy support staff, and approving and accrediting their qualifications and training
- maintaining a register of pharmacists, pharmacy technicians and pharmacies
- setting the standards of conduct and performance that pharmacy professionals have to meet throughout their careers
- setting the standards of continuing professional development that pharmacy professionals have to achieve throughout their careers
- investigating concerns that pharmacy professionals are not meeting our standards, and taking action to restrict their ability to practise when this is necessary to protect patients and the public
- setting standards for registered pharmacies which require them to provide a safe and effective service to patients
- inspecting registered pharmacies to check if they are meeting our standards

We welcome the opportunity to respond to the consultation. Whilst the consultation document as a whole is of interest to us we have limited our response to focus on areas where we feel our work is directly relevant to the proposals.

We know that health professionals being open and honest when things go wrong is one of the best ways to protect patients. We believe that a culture of openness in the NHS, and across healthcare in general, is critical to improving safety. It will also ensure there is less emphasis on blame and more focus on transparency, speaking up and learning from mistakes when things go wrong.

Cultural change is also an important driver for confidence in raising concerns. This guidance should provide important leadership in playing a key role in driving, and reinforcing, the necessary cultural changes and is another important step in embedding a culture of openness and making it the

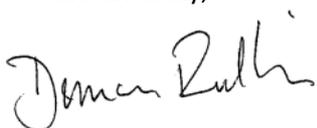
everyday norm. We believe that no one organisation or individual can drive cultural change. It will take a joint effort from all involved; professionals and their leadership bodies, employers, education providers, regulators and governments.

We are currently consulting on standards for pharmacy professionals, and have reflected the importance pharmacy professionals speaking up when they have concerns or things go wrong, by including the following draft standard *Pharmacy professionals must speak up when they have concerns or when things go wrong*. The consultation can be found [here](#). We are also reviewing our standards for registered pharmacies which currently include the following standard Staff are empowered to provide feedback and raise concerns about meeting these standards and other aspects of pharmacy services. Through these standards we aim to ensure an environment exists in which pharmacy professionals can raise concerns 'routinely and early' and will seek views on these later this year. In addition, we intend to review the guidance that supports our standards, and this will include our guidance on raising concerns.

We note that we are referenced as an organisation who staff can raise concerns with in relation to a registered healthcare professional. Given that we regulate registered pharmacies, it may be helpful to explain that staff can also raise concerns with us about registered pharmacies, and the quality of pharmacy services provided from these.

It will be important for us to work with NHS England and others to better understand how the guidance would work in practice so that it dovetails appropriately with our own standards and inspection process. It will be important to discuss in detail the implementation of the guidance in the contexts in which we regulate, including obviously "NHS" organisations as well as the retail businesses (of varying sizes and orientations) which own and run many community pharmacies. Once the consultation concludes we will be in touch with you to arrange a meeting.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Duncan Rudkin', written in a cursive style.

Duncan Rudkin
Chief Executive and Registrar