Monitor, NHS (TDA), NHS England  
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08 January 2016

Dear sir/madam

Freedom to speak up: whistleblowing policy for the NHS Draft for consultation

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 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 and ensuring there is less emphasis on blame and more focus on transparency, speaking up and learning from mistakes when things go wrong. We therefore welcome the introduction of a single national whistleblowing policy. It is a positive response to recent reviews that, through the outcomes and actions taken as a result of the policy, will bring confidence to those wishing to raise concerns. We too have reflected on the importance of an open and honest culture, and have worked to embed this in all our work.

We support the powerful and compelling messages in the Freedom to Speak Up report. The actions stemming from this report across healthcare, including this proposed policy, are important steps in enabling staff to speak up and raise concerns and it should provide leadership in playing a key role in
driving the necessary cultural changes. 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; to embed the culture of openness and make it the everyday norm.

If you would like to discuss the points raised in this response, or any other aspects of the GPhC’s work, please do not hesitate to contact me.

Yours sincerely,

Hugh Simpson

Director of Strategy
General Pharmaceutical Council