

The Professional Standards Authority
FAO Linda Allan
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By email: fee.consultation@professionalstandards.org.uk

15 July 2015

Dear Linda

Consultation on the Authority's requirements for 2015/16 in respect of its regulatory and standards functions

The GPhC welcomes the opportunity to respond to this consultation. Please see our responses to the consultation questions below.

1. Are there any activities we should be undertaking that have not been detailed?

No.

2. Are there any activities we propose that should be removed?

No.

3. Do you think that our proposals for our work in 2015-16 are reasonable?

We note that the Authority is proposing an increase in budget of 25% for 2015/16. This is a significant increase, with no detailed breakdown of the budget being presented. A number of factors are cited as justification for this increase, such as the changes to the performance review process and the higher number of FtP cases requiring review and potentially court referrals.

We will be submitting a response to the Authority's consultation on proposed changes to the performance review process. The revised approach is intended to be a more targeted one. Without further information around the explanation for the increased costs associated with this, it is difficult to understand why the proposed changes will increase costs rather than providing efficiencies.

We would suggest that there should be greater transparency about the basis of the Authority's assumptions regarding the costs associated with this year's work plan and both the criteria and model that will be used in future.

4. Do you think our assumptions regarding the number of Section 29 cases are sound?

The assumptions about the predicted rise in section 29 cases seem to be based on the predicted rise in the number of FtP cases alone. They do not appear to take account of other factors, for example improvements in the quality of decision making as a result of various interventions including PSA learning points letters and initial stages audits.

Although the GPhC continues to see a substantial rise in concerns, the PSA appealed only one of the GPhC's final FtP decisions during the last year. In fact this is the only occasion on which the Authority has appealed a GPhC decision.

We note the Authority's assumption that new legislation, including the transposition of the MRPQ Directive and the ability for the GPhC and other regulators to check language skills at registration, is likely to result in the number of section 29 cases and referrals (paras 5.33-5.34). This seems unlikely and we are unclear as to the basis of this assumption.

5. Do you think our approach regarding cost recoveries is sound?

Yes, on the basis that the fees will be used only to fund the statutory functions of regulatory oversight and improvement.

6. Do you think our approach to borrowing and reserves is appropriate at this point in time?

Yes, we think it right that the Authority reviews its approach to borrowing and reserves, in an open and transparent way, prior to the consultation on its 2016/17 requirements.

If you would like to discuss our response further, please do not hesitate to contact me.

Yours sincerely



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