

C. QUESTIONNAIRE – PHARMACISTS

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. 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.

1. Please select the professions which are handled by your authority (please refer to the generic name of the professions as listed in the [Database of Regulated Professions](#)):*

Pharmacists	X
Specialist pharmacists	
Other pharmacist	X

If "Specialist pharmacist" or "Other pharmacist", please specify:

In Great Britain, pharmacists can also be independent or supplementary prescribers. We accredit non-medical independent prescriber courses and also the conversion courses for pharmacist supplementary prescribers to become pharmacist independent prescribers. The pharmacist prescriber courses are only available to persons who are registered as pharmacists with the General Pharmaceutical Council (GPhC) and who have two years' experience as a registered pharmacist in GB.

2. The introduction of the EPC for specific professions is subject to the conditions set out in Article 4a(7) of Directive 2005/36/EC, which include a sufficient interest being expressed by the relevant stakeholders.

Does your authority support the introduction of the EPC for pharmacist professions handled by your authority?*

Yes	
Yes, but only for certain pharmacist profession(s) handled by your authority	
No	X
We do not know	

- 2.2 If you consider that EPC should NOT be introduced for any of the pharmacist professions handled by your authority, please explain your position:

In our view, the EPC will inhibit free movement, undermine patient safety, lead to confusion for patients, employers and applicants and also increase bureaucracy and costs for regulators. Although the stated aim of the card is to simplify and speed up the recognition process and promote free movement of professionals, the evidence from our internal performance monitoring indicates that the free movement of European pharmacy professionals is not delayed in anyway by our current recognition and registration processes. We register about 400 European qualified pharmacists a year within the Directive time limits so cannot see what added value the card will bring.

To avoid running the risk of tacit authorisation, when the time limit embedded in IMI is reached, applications are more likely to be rejected resulting in increased, rather than reduced, processing times with associated increase in administrative burden, costs and appeals. Rather than simplifying and speeding up the recognition process the EPC may have the opposite effect.

Mobility data

Please note that you are requested to answer the following question **ONLY IF (and to the extent) you have access to the data requested.**

3. How many professionals (handled by your authority) currently practice on a permanent basis and how many professionals provide services on a temporary basis in your country? Please also indicate the verified data source each time you provide information.

	Number of permanently established professionals:	Number of professionals providing services on a temporary basis:	Date of reference	Data source
Pharmacists	3,017 (EEA pharmacists)	None	09/05/2014	Part 1 of the GPhC Register
Specialist Pharmacists				
Other pharmacists	56 (EEA pharmacists)	N/A	09/05/2014	Annotations to Part 1 of the GPhC Register

- 3.1 Please add any comments/observations you consider necessary in relation to the data provided above:

Pharmacist Independent and supplementary prescribers make up the 'Other pharmacists' category. The total number of pharmacists on Part 1 of the register on 9 May was 48,782 of which 3,229 were independent/supplementary prescribers.

4. In your view, is the mobility of pharmacists in your country (i.e., the number of incoming and/or outgoing professionals) likely to increase in the coming 5 years?

Yes

No

We do not know

4.1 Please explain why, in your view, the mobility of pharmacists is likely to increase or decrease in/out of your country:

Although a wide range of socio and economic factors influence mobility, we have no reason to believe that the upward trend in mobility is likely to change.

5. Do you have any evidence (studies/reports/surveys or similar information) that would demonstrate the mobility trends of pharmacists and/or their potential for mobility in the future?

If so, please upload any relevant documents:

Alternatively, please specify a link to an online document:

We have no evidence to demonstrate the mobility trends of pharmacists other than information already notified to the European Commission. See the Regulated Professions Database (<https://webgate.ec.europa.eu/regprof/index.cfm?fuseaction=home.home>)

APPLICATION PROCEDURES

Please note that you are requested to answer the following questions ONLY IF you are handling the procedures for the recognition of professional qualifications in your country.

- 1) Document requirements in your country acting as the host Member State (i.e., a country of destination)

6. What mandatory application documents are typically requested by the competent authority in your country from pharmacists from another EU country who want to establish themselves permanently and seek for the recognition of their professional qualifications?

Please note that the competent authority of the host Member State may ask a professional to submit various application document, which may differ depending on the type of a recognition system that applies.

*Pharmacists may benefit from **automatic recognition**, if they hold one of the qualifications stipulated in point 5.6.2 of Annex V of Directive 2005/36/EC, and if the training began after the reference date mentioned therein. This means that the competent authority of the host Member State may not ask for documentation specifying the content of the training taken. If the training began before a reference date mentioned in Annex V, and the training does not meet the minimum training requirements, pharmacists may still benefit from **automatic recognition through acquired rights**, if they can show (via an attestation from a Member State of origin) that they have been effectively and lawfully practicing a profession in question for at least three consecutive years during the five years prior to the attestation being issued.*

*When a professional cannot be granted automatic recognition (e.g., a specialist pharmacist or a pharmacist that does not meet the conditions for automatic recognition), recognition comes under the **general system**. This means that the competent authority of the host Member State may compare the training of a professional with the national requirements and in case of substantial differences may impose compensation measures before recognition.*

	Automatic system of recognition	Automatic recognition through acquired rights	General system of recognition
Proof of nationality (e.g., passport or ID card)	X	X	X
Certificate of compliance (conformity) with Directive 2005/36/EC	X	X	x
Certificate of change of denomination (if the name of qualification meeting the minimum training requirements does not correspond to the name given in Annex V of Directive 2005/36/EC)	X	X	X
Certificate of acquired rights (attestation on the effective and lawful practice)		X	
Proof of attestation or qualification (e.g., a copy of diploma)	X	X	X
Other information about the training (duration, subjects studied, ratio between theory and practice, continuous professional development, etc.)			X
Certificate issued by a public authority on proof of professional experience if qualified in a non-EEA country and qualification has already been recognised by another EU country			X
Other proof of professional experience (e.g., payslip or attestation from employer)			X
Proof of good character/repute/no declaration of bankruptcy or the fact that a professional has not been suspended or prohibited from practice for serious professional misconduct or criminal offence	X	X	X
Medical certificate/fitness to practice	X	X	X
Proof of financial standing			
Proof of insurance cover or other means of protection with regard to professional liability	X	X	X
Other mandatory documents	X	X	X

6.1 If there are "Other mandatory documents" not mentioned in the table above, please specify:

Across all 3 categories applicants are required to complete a questionnaire giving details of qualification, awarding university, country of award and years of study together with details of all work experience as a pharmacist (name and address of employer and whether employed full-time or part-time). These details are cross checked against information in certificates from the home competent authority. Where any discrepancies are identified, justified doubts are raised and information checked with the home competent authority.

All applicants must also provide a birth certificate and marriage or civil partnership certificate if there has been a change of name. If the applicant is a non-EEA national applying on the basis of a Community right ('derived rights'), for example as a spouse of an EEA national, then documentary evidence that they are to be treated as an EEA national for the purpose of recognition of professional qualifications is required.

If an applicant qualified in a non-EEA country and their pharmacy qualification has already been recognised by another EU country for practise as a pharmacist, we require the third country diploma, academic transcript and syllabus, and details of the recognition process in the EU country.

In the case of a general systems application we normally require a certificate from the home competent authority to confirm that the applicant does not qualify for automatic recognition.

Following recognition of the qualification, the GPhC requires other mandatory documents as a pre-condition of registration. In relation to the 'medical certificate/fitness to practise', applicants provide a self- declaration. In their registration application applicants are asked whether they currently have any problems with their physical or mental health that could impair their ability to practise safely and effectively or which otherwise impairs their ability to carry out duties in a safe and effective manner. If an applicant answers 'Yes' they are required to provide further details which are then assessed as part of the application for registration.

In relation to 'proof of insurance cover or other means of protection with regard to professional liability', applicants are required to provide a self- declaration confirming that they will have appropriate indemnity arrangements in place before they start to practise in GB as part of their application for registration.

6.2. Is the professional invited to provide any other (optional) documents?

Yes

No

We do not know

If so, please specify what documents a professional can provide on an optional basis:

Under the General system of recognition, applicants are invited to provide evidence of all of their qualifications, work experience and CPD wherever obtained which they believe support their application and go towards meeting the national requirements for registration.

6.3 How much is the applicant required to pay for the recognition of his or her professional qualifications in your country (in EUR)?

	Automatic system of recognition	Automatic recognition through acquired rights	General system of recognition	Comments
Average fee for the recognition of professional qualifications (in EUR)	126 EUR (£105)	126 EUR (£105)	577.2 EUR £481	Exchange rate of 1.20 EUR to £1

6.4 Please explain how the levels of recognition fees are calculated in your country:

The fees are set in legislation (Rules) following a public consultation. Please see the General Pharmaceutical Council (Registration and Renewal Fees) Rules 2012
<http://www.pharmacyregulation.org/sites/default/files/Fees%20rules%202012.pdf>

All fees are set to reflect the relative costs associated with processing the application.

Above are the fees for recognition of the qualification and work experience under the various routes.

(Once the qualification has been recognised and in the case of the general systems after successful completion of the required compensation measure, applicants make an application for registration. All applicants irrespective of whether UK/EEA or third country qualified make the same application for registration paying the same application fee and first entry fee. The first entry fee entitles the person to remain registered on Part 1 of the GPhC register for a full calendar year from the date of entry).

7. Do the competent authorities in your country require that pharmacists from another EU country who want to provide temporary services submit a prior written declaration?

Yes

No

We do not know

7.1 Do the competent authorities in your country carry out prior check of qualifications under Article 7(4) of Directive 2005/36/EC of any pharmacists who do not benefit from the automatic recognition (e.g., specialised pharmacists) coming from another EU country before the first provision of temporary services?

7.2. What mandatory documents (if any) are typically requested by the competent authority in your country from pharmacists from another EU country who want to provide temporary services?

	Documents for a prior declaration under Article 7(2) of Directive 2005/36/EC	Documents for cases with prior check of qualifications under Article 7(4) of Directive 2005/36/EC
Proof of nationality (e.g., passport or ID card)	X	X
Proof of legal establishment in a home Member State (such as attestation from a competent authority or competent professional body, or copy of professional license, extract from trade register, certificate from employer accompanied by tax or social security document)	X	X
Proof that a professional is not suspended or prohibited from practice, even temporarily, in a home Member State (such as, extract from juridical records, certificate from judicial or police authority)	X	X
Proof of insurance cover or other means of protection with regard to professional liability	X	X
Evidence of professional qualifications	X	X
Proof of practical experience of at least two years during the last ten years, when training/profession are not regulated in an EU country of establishment		
Other documents	X	X

If there are "Other documents" not listed above, please specify:

Under both 7(2) and 7(4) if the pharmacist is not a national of a relevant European State, we require evidence of the Community right by virtue of which they are to be treated for the purpose of recognition if they were an EEA national.
Under Article 7(4) we require evidence from the EEA pharmacist of all their qualifications, work experience and CPD wherever obtained that is capable of being evaluated to find out whether the national requirements for practising as a pharmacist in Great Britain have been met.

8. Do the competent authorities in your country typically ask for translations and certified copies of the application documents? If so, for which documents?

	Certified copy	Ordinary translation	Certified/ authorised translation
Proof of nationality (e.g., passport or ID card)	X		X
Certificate of compliance (conformity) with Directive 2005/36/EC	X		X
Certificate of change of denomination (if the name of qualification meeting the minimum training requirements does not correspond to the name given in Annex V of Directive 2005/36/EC)	X		X
Certificate of acquired rights (attestation on the effective and lawful practice)	X		X
Proof of attestation or qualification (e.g., a copy of diploma)	X		X
Other information about the training (duration, subjects studied, ratio between theory and practice, continuous professional development, etc.)	X		X
Certificate issued by a public authority on proof of professional experience if qualified in a non-EEA country and qualification has already been recognised by another EU country	X		X
Other proof of professional experience (e.g., payslip or attestation from employer)	X		X
Proof of good character/repute/no declaration of bankruptcy or the fact that a professional has not been suspended or prohibited from practice for serious professional misconduct or criminal offence	X		X
Medical certificate/fitness to practice	X		
Proof of financial standing			
Proof of insurance cover or other means of protection with regard to professional liability	X		
Other mandatory documents	X		X

8.1 If there are "Other documents" not mentioned above, please specify:

(We have answered this question on the basis that it concerns applications for establishment. This is because temporary service providers do not make an application as such but only provide a declaration of intention to provide services with supporting documents).

Please note that we require originals of documents listed below not certified copies:

- **Certificate of compliance (conformity) with Directive 2005/36/EC**
- **Certificate of change of denomination (if the name of qualification meeting the minimum training requirements does not correspond to the name given in Annex V of Directive 2005/36/EC)**
- **Certificate of acquired rights (attestation on the effective and lawful practice)**
- **Certificate issued by a public authority on proof of professional experience if qualified in a non-EEA country and qualification has already been recognised by another EU country**
- **In the case of a general systems application we normally require an original certificate from the home competent authority to confirm that the applicant does not qualify for automatic recognition.**

The applicant must arrange for these original documents to be sent directly to the GPhC by their home competent authority in support of their application for recognition.

If the applicant is a non-EEA national applying on the basis of Community rights ('derived rights'), for example as a spouse of an EEA national, then documentary evidence that they are to be treated as an EEA national for the purpose of recognition of professional qualifications is required. We accept certified copies and authorised translations of this documentary evidence.

If the applicant qualified in a non-EEA country and qualification has already been recognised for practice as a pharmacist by another EU country, we require the third country diploma, the academic transcript and syllabus, and details of the recognition process in the EU country. We accept certified copies and authorised translations of these documents.

Following recognition, the GPhC requires further information as a pre-condition of registration.

We require the original document evidencing proof of good character/repute or the fact that a professional has not been suspended or prohibited from practice for serious professional misconduct or criminal offence. (We do not require a declaration of no bankruptcy)

In relation to the 'medical certificate/fitness to practise', applicants provide a self-declaration. In their registration application applicants are asked whether they currently have any problems with their physical or mental health that could impair their ability to practise safely and effectively or which otherwise impairs their ability to carry out duties in a safe and effective manner. If an applicant answers 'Yes' they are required to provide further details which are then assessed as part of the application for registration.

In relation to 'proof of insurance cover or other means of protection with regard to professional liability', applicants are required to provide a self- declaration confirming that

they will have appropriate indemnity arrangements in place before they start to practise in GB as part of their application for registration.

PLEASE NOTE: This is not required at the application for recognition stage.

9. What types of payment are acceptable for recognition procedures in your country (acting as host Member State)?

Onsite payments (i.e., done in the location of the authority, the bank, post office, etc.)

Online payments (i.e., done remotely via web or mobile device) X

- 9.1. If "Online payments" are accepted by the authorities in your country, please specify the means of online payments available:

credit card X

bank card X

bank transfer

PayPal

Other X

If "Other", please specify:

Applicants provide their card details to us & we make the payment on-line on their behalf

- 9.2 When do professionals have to execute the payments for applications?

Prior to application (attach to application) X

During application

After the procedure for recognition is completed

Other X

If "Other", please specify:

Processing can only start once we are notified that card payment has been successful.

2) Procedures in your country acting as the home Member State (i.e., a country of origin)

10. What application documents do pharmacists typically request from the authorities in their country of origin (acting as the home Member State) prior to submitting an application for recognition of qualification in another EU country? What are the fees applicable to the issuance of the certificates (in EUR) and who is entitled to issue the requested documents?

	Documents issued in the home Member State (please mark "x"):	Average applicable fees (in EUR):	Issuing Authority (or Relevant body)
Certificate of good conduct/good standing/good health/good character/no declaration of bankruptcy or the fact that the professional has not been suspended or prohibited from practice for serious misconduct or criminal offence	X	see answer below which applies to all certificates marked 'X'	GPhC
Certificate of professional experience if a professional holds qualification obtained in a non-EEA country and this qualification has already been recognised by another EU country	X		GPhC
Other proof of professional experience (e.g., payslips or attestations from employers)			
Proof of legal establishment in an EU country (e.g., in case of prior declaration for temporary provision of services)	X		GPhC
Certificate of compliance (conformity) with Directive 2005/36/EC	X		GPhC
Certificate of change of denomination	X		GPhC
Certificate of acquired rights	X		GPhC
Other documents (please specify)			

Please explain how the levels of fees for issued certificates are calculated in your country:

All documents marked 'X' are issued as part of a single document referred to as a certificate of current professional status (CCPS) as described in the Health Professions Crossing Borders Edinburgh Agreement.
Each CCPS provides information of the individual's registration status and fitness to practise history. In relation to information about qualifications and work experience the CCPS is tailored to describe the circumstances of the individual pharmacist.

The fees are set in legislation (Rules) following a public consultation. Please see the General Pharmaceutical Council (Registration and Renewal Fees) Rules 2012
<http://www.pharmacyregulation.org/sites/default/files/Fees%20rules%202012.pdf>

All fees are set to reflect the relative costs associated with processing the application. The fee for issuing a certificate of current professional status in respect of a person entered in Part 1 of the Register is 93.6 EUR (£78).

(We do not issue a declaration of no bankruptcy)

11. What types of payment are acceptable for issuing the certificates specified above in Q10 in your country (acting as home Member State)?

Onsite payments (i.e., done in the location of the authority, the bank, post office, etc.)

Online payments (i.e., done remotely via web or mobile device) X

11.1. If "Online payments" are accepted by the authorities in your country for issuing the certificates specified above in Q10, please specify the means of online payments available:

credit card X

bank card X

bank transfer

PayPal

Other X

If "Other", please specify:

Applicants provide their card details to us & we make the payment on-line on their behalf.

11.2 When do professionals have to execute the payments for certificates?

Prior to request of the documents concerned X

- During the treatment of request
- After the issuance of the documents
- Other** **X**
- We do not know

If "Other", please specify:

Processing can only start once we are notified that card payment has been successful

3) Other questions related to the procedures of recognition

12. In your view, what types of payment would be most preferred in the context of EPC procedure?

Onsite payments (i.e., done in the location of the authority, the bank, post office, etc.)

Online payments (i.e., done remotely via web or mobile device) X

- 12.1. If "Online payments" are most preferred, please specify the means of online payments:

credit card **X**

bank card **X**

bank transfer

PayPal

Other

- 12.2 Please explain your position:

The time allowed for processing/verifying an application for recognition by the host member state should only start running once the host member state has successfully received payment from the applicant to cover all of its administrative costs for verifying and also, if a general systems application, for evaluating the application. General systems applications are evaluated by expert professional and academic pharmacists and costs of the evaluation must be met by the applicant prior to the evaluation process starting.

13. How can the pharmacists apply for the recognition of their professional qualifications in your country (multiple choice possible)?

By an online application

By a written application (offline) X

We do not know

14. In your view, is there any need for written (off-line) applications for the EPC (in addition to a possibility to apply online via a public interface)?

Yes

No

We do not know

16. Please describe the experiences (either positive or negative) encountered by pharmacists which are related to online applications and/or submission of electronic documents in your country:

17. To your best knowledge, how many pharmacists in your country would be able to use an online application for the EPC?

None

Only a few

Majority

A vast majority

All of them

OTHER QUESTIONS

18. To your best knowledge, how long does it typically take in your country for a pharmacist from another EU country to receive recognition of professional qualifications under the system of automatic recognition from the moment of the application?
- 1-3 months**
- more than 3 months
- We do not know
19. To your best knowledge, how long does it typically take in your country for a pharmacist from another EU country to receive recognition of professional qualifications under the general system of recognition from the moment of the application?
- 1-4 months**
- more than 4 months
- We do not know
20. To your best knowledge, how long does it typically take in your country for a pharmacist from another EU country to make a declaration for temporary provision of services from the moment of the application?
- less than 1 month
- 1-2 months
- more than 2 months
- We do not know**

21. Do you have any further comments as to the suitability of the EPC procedure for the profession of pharmacist?

We understand that the creation of the EPC by the home member state is to replace the 'recognition' stage of an application process.

In our view the recognition stage of our application process is an important stage for us to cross-check information on qualifications and work experience provided directly to us by applicants against information provided in certificates from the competent authority.

We believe it is for us to decide whether an applicant has rights to automatic recognition of their qualification or work experience or if they should follow the General Systems route to our register. We cannot see how the EPC will speed up the process because if we were only to receive information from the home competent authority we would still wish to cross check details and make further enquiries to check whether an applicant's route to our register was correctly determined by the home member state. The management of patient safety risks sits with us and consequently verification and determination of route to our register ought to remain our responsibility.

Because of the potential for confusion and impact on patient safety we would rather reject an application for recognition rather than fail to meet a time limit and risk 'tacit authorisation'. This would delay the process of recognition and lead to increased administrative burden and costs.

We also understand that possession of the EPC will not provide an automatic right to practise a particular profession if there are registration requirements already in place in the host member state before an EPC is introduced. And also that the host member state is to make a professional's electronic certificate in IMI available to employers, patients and the public.

In the UK, all healthcare regulators have publically accessible, real-time web-based searchable registers of professionals who are registered and entitled to practise. The requirement to make the electronic EPC available to employers, patients and the public via the IMI system when it does not authorise practise could therefore duplicate information we already provide on registration and risk confusion. In the interests of patient safety we urge the EC to consider including a derogation in the implementing act from the requirement to make the EPC available to employers, patients and the public where a competent authority already has publicly accessible web based registers of professionals who are qualified and fit to practise.

In addition we believe that the EPC is not suitable for the recognition of pharmacists' qualifications under the general systems procedures. In these cases we would not just be looking at the qualifications but also at all of the pharmacists' training and work experience including Continuing Professional Development wherever obtained including outside of the EEA. Such applications need to be examined on a case by case basis against the national requirements for registration and we do not believe that such a complex process is compatible with the EPC process.

In our view the implementing act setting out the EPC processes must ensure that patient

safety remains the primary concern and is not compromised in any way by a desire for speed and simplicity.