

Healthcare Improvement Scotland
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29 September 2015

Dear Sir/Madam

Building a comprehensive approach to reviewing the quality of care

Introduction

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in Great Britain. It is our job 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 welcome the opportunity to respond to the consultation on Healthcare Improvement Scotland's (HIS) proposals for a new model of reviewing the quality of care in Scotland.

Whilst the consultation document as a whole is of interest to us, as an independent statutory regulatory body we have limited our response to general feedback on areas where we feel our work is directly relevant to the proposals. We are happy to continue to contribute to future discussion and work in this area.

Our role and functions

Our statutory role as set out in the Pharmacy Order 2010 is:

'To protect, promote and maintain the health, safety and well-being of members of the public and in particular of those members of the public who use or need the services of registrants, or the services provided at a registered pharmacy, by ensuring that registrants, and those persons carrying on a retail pharmacy business at a registered pharmacy, adhere to such standards as the Council considers necessary for the safe and effective practice of pharmacy.'

Consistent with other health professional regulators, our legislation makes explicit that our purpose is that of patient protection. We are unique amongst the UK health professional regulators as we have a statutory role in relation to 'system' regulation (i.e. regulating the provision of services by registered pharmacies) as well as the 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

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- 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

Regulatory model

The guiding principles for the proposed HIS approach set out in the consultation paper are consistent with the approach the GPhC has adopted.

Our aim is for pharmacy regulation to play its part in improving quality- of which safety is a critical element- in pharmacy practice and ultimately in the health and wellbeing of patients and the public

We have explicitly rejected a regulatory model that focuses on prescriptive rules, minimum standards and tick box compliance. Our focus is on safe and effective outcomes for patients and on developing a regulatory model that not only provides assurance that pharmacies and pharmacy professionals are safe, but also promotes standards and encourages improvements across pharmacy.

Our work to completely overhaul the way we regulate registered pharmacies is an example of this. We have moved from an outdated inspection model to one that is proportionate, transparent, patient-centered and based on risk.

Pharmacies are assessed against a single set of standards that describe what needs to be achieved for patients. If standards have not been met pharmacies have to complete action plans to address deficiencies. This has given pharmacies a very clear way to understand where they need to improve safety for patients, and what steps they need to take.

Like HIS, we recognise that that our regulatory model has to be flexible enough to adapt to changes in the health and social care landscape and take account of different models of service delivery across a variety of care settings. We too are reviewing opportunities to carry out inspections focused on specific services, or thematic inspections. Our approach is likely to evolve over time based on a range of factors including the development of new potentially high risk services in pharmacy and feedback from our stakeholders.

Developing our new inspection approach in partnership with the profession, patients and the public and other relevant stakeholders is a key priority for the GPhC and we are continuing to make refinements based on the feedback we receive. We therefore fully support the HIS approach being developed in partnership and owned by all those involved.

Developing a culture of patient-centered professionalism

The consultation document talks about culture underpinning the proposed quality framework and this very much aligns with the GPhC's approach.

Encouraging and supporting the professionalism of the pharmacy team and promoting a culture of openness and candour which focuses on what matters to patients is fundamental to the GPhC's regulatory approach and strategy. We believe that it is the professionalism of members of the pharmacy team which has the greatest

influence on the quality and safety of services to the public and patient care. Regulation cannot create professionalism but it can – working with others – help to create an environment within which professionalism can flourish.

In April 2015 we launched an important discussion document which states clearly the importance we put on patient-centred professionalism. This will remain a key theme for the GPhC as we take forward our work to review our core professional, education and pharmacy standards and as we continue to develop our proposals for the assurance of registrant's fitness to practise.

Working in collaboration

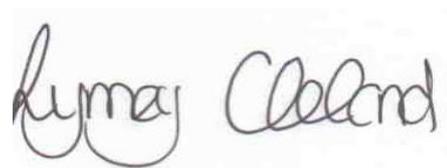
The GPhC is one part of a complex system for overseeing and improving the quality of pharmacy care and services in Scotland. In all areas of our work we understand that effective joint working with partner organisations and other regulators is essential.

The GPhC is building and using intelligence networks and effective operational partnerships with other regulators and scrutiny bodies throughout Great Britain to identify and tackle risk. We are also exploring how we best use the data and information we capture from our inspections and other regulatory functions to help inform and drive continuous improvement at a national and local level.

We therefore fully support the consultation document proposals to strengthen collaboration and intelligence sharing mechanisms in order to anticipate problems earlier and offer more timely intervention and support. We have a memorandum of understanding in place with HIS to facilitate joint working and would wish to play our part in arrangements to further develop collaborative working between the various scrutiny and regulatory bodies in Scotland.

As this response has highlighted, the approach proposed by HIS sits alongside that of the GPhC and we welcome the opportunity to continue to work in collaboration. If you would like further information on the points raised in this response, or any other aspects of the GPhC's work please do not hesitate to contact me on the details provided below.

Yours sincerely



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