Dear Sir/Madam


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 this consultation and whilst the consultation document as a whole is of interest to us, we have limited our response to comments where we feel our work is directly relevant to the proposals. We are happy to continue to contribute to future discussions on how pharmacy, pharmacists and pharmacy technicians can improve the health and wellbeing of the public.

Our primary role 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.

The GPhC’s “Standards of conduct, ethics and performance” makes clear that pharmacists and pharmacy technicians have an obligation to take action to protect the wellbeing of patients and the public and to promote their health wellbeing. We welcome the proposals within this white paper that acknowledges the fact that pharmacy can play a wider role in improving public health and proposed changes that give them an opportunity play a wider role.

The proposal to make health boards periodically assess the pharmaceutical needs is a positive one. In order to ensure effective planning, training and service development this would seem essential to enable pharmacy and others to play the most effective role in promoting the health and wellbeing of the population.

These assessments being completed as a discrete part of LHB’s assessment of local health and wellbeing needs seems sensible. Establishing needs of a population is one thing but it is also important to ensure that pharmacy is able to meet the health needs of the local population.
There is a wide range of information that Local Health Boards could incorporate in its pharmaceutical needs assessment. There would need to be an accurate assessment of the health status and needs of the local population and judgements made of how or if pharmacy could best meet these needs. In a time of financial restraint in the NHS it would seem sensible to allow pharmacy to provide more healthcare locally. If the pharmacy workforce is able to provide a health improving service safely, more efficiently and effectively than other providers it would seem sensible for this to be the case. The frequency of such reviews of the health needs of the population is a matter for the health board and would depend very much on local circumstances.

There would need to be engagement with community pharmacy, training providers such as WCPPE on workforce development, capability and capacity building. The change in the GPhC standards so that they focus on outcomes allow developments in pharmacy practice to take place so the health needs of the population can be met.

Many pharmacists, pharmacy technicians and pharmacies now play a wider role in addressing the local health needs or patients and the public. The breadth of services provided and the health needs within a locality should be taken into account when applications are considered so that pharmacists and technicians and pharmacy staff can make the greatest contribution to improving the health and wellbeing of the public.

We agree with the proposal to allow Local Health Boards to invite community pharmacies in their area to provide specified services to meet identified pharmaceutical needs and where pharmacies are unable to do so adequately, invite additional pharmacies to become established in order to provide pharmaceutical services that meet the need of the local population. Our primary aim as a regulator is to ensure that pharmacists and pharmacy technicians put the care, well-being and safety of patients at the heart of what they do and that they must always be their first concern. If they are able to provide services that improve the health and wellbeing of the local population that would not otherwise be offered then they should be enabled to do so.

We are more than happy to meet with Welsh Government and LHB colleagues to discuss the proposals further if this would be helpful.

Yours sincerely,

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