

## Response ID ANON-DK39-698X-T

Submitted on 2014-09-30 13:22:06.505563

### Whistleblowing: prescribed persons reporting requirement

#### 1 What is your name?

**Name:**

Matthew Hayday

#### 2 What is your email address?

**Email:**

matthew.hayday@pharmacyregulation.org

#### 3 Please click one or more of the boxes below to give the best description of you are a respondent.

Regulator or prescribed body

**Other (please describe):**

#### 4 How many employees in total are there within the organisation in which you work?

50 to 250

#### 5 Do you agree with the proposed content of the report?

Yes

#### 6 What are your reasons?

**Please comment here:**

The proposed content of the report meets the primary aim in that it will provide greater reassurance to the public and whistle-blowers that appropriate action is being taken by the prescribed body. It also maintains the confidentiality of the process and combined they will increase confidence in the role of the prescribed body

#### 7 Who should the duty apply to?

All regulators

**If certain regulators, which ones?:**

#### 8 Should any other information be included in the report?

No

**If Yes, what information?:**

#### 9 We propose that the report should be published on each organisation's websites along with general annual reports (such as accounts and performance). Do you agree?

Yes

**What are your reasons?:**

It makes sense to combine all the annual reporting in one location as it will be easier for the public to locate.

#### 10 Should this report be contained within existing annual reports of your organisations / the organisation concerned?

Yes

#### 11 Or as a stand-alone report?

No

#### 12 What are your reasons?

**Please comment here:**

It would seem sensible to add the reporting requirements into the existing format. The GPhC's annual report has a number of requirements detailed in the

Pharmacy Order 2010 including specific performance data, EDI and Welsh Language requirements. This would not appear to be dissimilar.

One concern is that by adding the report to the existing annual reporting it may be difficult for members of the public to find easily. Clear guidance will be needed to signpost the public to where the report is contained by both government and the prescribed persons.

**13 Should this information be reported to Parliament?**

Yes

**14 Do you foresee any problems with this?**

No

**Please explain what these problems are:**

If the reporting for prescribed persons is combined with the existing annual report then there would be no issue in presenting the information to Parliament. The GPhC is already required to lay its annual report and accounts before Parliament and the Scottish Parliament.

**15 At what point of the year would it be most practical and appropriate to publish such information? (for example end of the financial year).**

**Please comment here:**

In line with the current annual reporting arrangements, the end of the financial year.

**16 What are your reasons for this timing?**

**Please comment here:**

It will be difficult to include the report if it has a different publication date from the rest of the annual report.

**17 Does your organisation already collect and report on the data required by this policy change?**

No

**18 If yes, what data does your organisation already collect?**

**Please comment here:**

**19 Considering additional burdens that could be created by this policy change: In a year, how much staff time would your organisation need to comply with this change?**

**Please comment here:**

The impact would be minimal.

**20 For those who can provide staff time: How did you work out the staff time needed to comply with this change?**

**Please comment here:**

**21 In addition to staff time, would your organisation have to incur any monetary expenditure to comply with this change?**

No

**22 For organisations that would have to incur monetary expenditure: In a year, how much monetary expenditure would your organisation need to incur to comply with this change?**

**Please comment here:**

**23 For those who can provide an expenditure figure: How did you work out the expenditure needed to comply with this change?**

**Please comment here:**

**24 Do you believe that providing information in an annual report will increase confidence that reports of wrong doing are handled correctly?**

Yes

**25 Do you believe that providing information in an annual report will dispel the belief that the whistleblowing framework is failing whistleblowers?**

Yes

**26 Do you believe that providing information in an annual report will improve the consistency of information across prescribed persons?**

Yes

**27 Do you have any further comments or suggestions about the implementation of this duty to report?**

**Please comment here:**