

May 2016

HCPC response to the General Pharmaceutical Council consultation on Standards for Pharmacy Professionals

1. Introduction

- 1.1 The Health and Care Professions Council (HCPC) welcomes the opportunity to respond to the General Pharmaceutical Council's consultation on Standards for Pharmacy Professionals.
- 1.2 We are a statutory UK-wide regulator of 16 health, social work, and psychological professions. We maintain a register of professionals; set standards for entry to our register; approve education and training programmes for registration; and deal with concerns where a professional may not be fit to practise. Our main role is to protect the health and wellbeing of those who use or need to use our registrants' services.
- 1.3 We have set our general comments, and responses to specific questions in the sections below.

2. General Comments

- 2.1 Overall, we consider that the proposed new standards for pharmacy professionals are clear and concise. They broadly cover the areas in our standards of conduct, performance and ethics (SCPE) which is important because service users and members of the public expect the same standard of care from all health and care professionals.
- 2.2 We consider that the updated format and layout are an improvement from the existing standards of standards of conduct, ethics and performance.

3. Our responses to specific questions

Q1a. What else, if anything, should be added to or removed from the introduction?

- 3.1 For further consideration, we included a section in the introduction of our SCPE on 'what the standards mean for different groups', to make it clear from the outset how the document is relevant to different groups. These groups included service users and the public; registrants and applicants; and students.

Q2. We also intend to ask all pharmacist and pharmacy technician students to meet the standards for pharmacy professionals, rather than having a separate student code of conduct. Do you agree with this approach?

- 3.2 Yes. We publish guidance for students on conduct and ethics which is based on, and covers, the ten areas of our SCPE for registrants. Since we do not register students, we cannot require them to meet our SCPE; however, we expect students to understand how to apply the standards and to be able to meet them by the time they complete their education and training.

Q3a. What, if anything, is unclear?

- 3.3 In the existing GPhC standards of conduct, ethics and performance, the specific standards underneath the seven principles are numbered, which we consider an effective way to ensure clarity. We have found that numbering the specific standards beneath overarching standards, as in our SCPE, improves clarity and ability to reference individual standards.

Q6. Do you think the section 'applying the standards' is useful in helping you to understand the standards?

- 3.4 Yes, we consider that the information provided is clear and helpful, putting the overarching standards into context.

Q10. The new standards and their explanations make clear that a pharmacy professional's personal values and beliefs must be balanced with the care they give people who use pharmacy services. Do you agree with our approach?

- 3.5 Yes, we agree that person-centred care is an important part of safe and effective practice. Where a professional's personal values or beliefs may create a barrier to providing person-centred care, these should be identified so that steps can be taken to ensure that service users' interests remain the priority.

Q13. Are there any aspects of the standards that could have a negative impact on patients, members of the public, pharmacists, pharmacy technicians, or any other groups?

- 3.6 During our consultation last year on the revised SCPE, we received a significant number of concerns, largely from registrants, around the new requirement to apologise when things go wrong. The biggest concern was that apologies may be taken as an admission of liability or wrongdoing. We responded to this by adding for the term 'apologising' to the glossary, explicitly stating that we do not regard an apology, of itself, as an admission of liability or wrongdoing.

Q15. We plan to review and update our guidance in the following areas. Do you agree with the areas we have identified?

- 3.7 Yes. For further consideration, we have received a significant number of requests for further guidance on social media I response to our updated standard on appropriate use of social media.