



Association of Pharmacy Technicians United Kingdom

Association of Pharmacy Technicians United Kingdom (APTUK) response to the

General Pharmaceutical Council's updated publication and disclosure policy consultation.

The Association of Pharmacy Technicians UK (APTUK) is the professional leadership body for pharmacy technicians throughout in the United Kingdom. We are the only body that represents pharmacy technicians and all sectors of pharmacy in the UK. The APTUK, through strong, influential representative leadership, supports patient centred professionalism by encouraging in our membership, the attitudes and behaviours associated with outstanding healthcare professionals. We work on behalf of pharmacy technicians, championing and safeguarding the pharmacy technician profession, enhancing the education and scope of practice. To achieve our objectives and goals APTUK works closely and collaboratively with the other pharmacy organisations to help deliver professional excellence and identify the views of a range of pharmacy stakeholders in number of forums.

Pharmacy Technicians are healthcare professionals who are registered with the General Pharmaceutical Council (GPhC) for their license to practise. They are skilled professionals and essential members of the healthcare and pharmacy team, who broadly review, prepare, dispense, check, supply and issue a wide range and variety of medicines to patients. They also take an active role in providing patients with guidance on taking medicines and leading the dispensary team and operational services. As registered professionals, they are responsible and accountable for their own accurate and safe practice.

APTUK acknowledges that the roles of Pharmacy Technicians and that of other health care professionals need to evolve to meet the increased demands being placed on NHS services as outlined in the Five Year Forward View (FYFV), Medicines Value Programme, Community Pharmacy Forward View, Prudent Health and A Healthier Wales: Our Plan for Health and Social Care and Achieving excellence in pharmaceutical care: a strategy for Scotland.

To ensure that the importance of Pharmacy Technicians is realised in the delivery of transformational and sustainable National Health priorities for integrated patient centred care APTUK responds to consultations providing advocacy, views, opinions, assessments and beliefs on behalf of our members and profession.

In July 2018, the General Pharmaceutical Council issued a public consultation seeking comments and views on the updated publication and disclosure policy.

The publication and disclosure policy covers the information the GPhC publish on their website and online register; information on disclose to third parties; and how the GPhC deal with individual requests for information. It sets out how the GPhC will do this in a consistent, transparent and fair way.

The GPhC are requested views on two changes in the updated policy:

1. Changing the length of time for which sanctions appear on a pharmacy professional's entry on the online register, including lowering the period for a removal from indefinite to ten years and introducing a specific length of time for which a pharmacy professional's restoration appears on the online register
2. The factors we consider when making decisions about publication and disclosure. These include balancing the public interest with the rights of the pharmacy professional, relevant legislation, and our need to carry out statutory and regulatory work



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The consultation closed on 14th September 2018

APTUK responded on behalf of our Board of Directors, Professional Committee, Associates, Branches, our members and the pharmacy technician profession as below.

1. Do you think the factors being considered when deciding whether or not to publish or disclose information are:

Use section 4 of the consultation document to review the descriptions of the factors considered when making a decision to publish or disclose information.

- Clear - Yes
- Appropriate when making a decision in the public interest - Yes
- Fair to individual pharmacy professionals - Yes

2. It is the aim to balance publication and disclosure in the public interest with the individual's right to privacy. Do you think the factors being considered when deciding whether to publish or disclose information achieve this balance?

Comments:

We feel the factors considered to reach a decision on whether or not to disclose are appropriate and balanced. We feel the weighing of the consideration of "damage and distress" to the individual should be lower than that of the interest of the public. We agree that the publication should only be after completion of an investigatory process.

3. Do you think that the length of time for which a sanction is published should depend on the seriousness of the sanction?

Use section 5 of the consultation document to review the outlined revised periods for publication on the online register.

Comments

We feel the length of time a sanction is imposed and publically published should be determined by the nature of the sanction and that the proposed revised periods are appropriate.

4. The aim is to strike the right balance between the public interest, which includes the health, safety and well-being of the public, and the rights and freedoms of pharmacy professionals. Do you think the time limits being introduced for sanctions and restorations to be published achieve this balance?

Comments

We feel the time limits being introduced are achieving a balance between public safety and the rights of the pharmacy professional.

5. What kind of impact do you think the changes will have on the following:

- Patients and the public – Mostly positive
- Pharmacy professionals – Mostly positive
- Employers and pharmacy owners – Mostly positive



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Comments

We feel the impact will have mostly positive impacts on all included.

6. Do you think any of the changes will have an impact – positive or negative – on certain individuals or groups who share any of the protected characteristics listed below?

These protected characteristics are (Equality Act 2010): age disability gender reassignment marriage and civil partnership pregnancy and maternity race religion or belief sex sexual orientation

We do not feel there will be any specific impact (positive or negative) on these individuals or groups.

7. Comments on any other impact changes not already mentioned

No further comments

8. If you have any further comments on the publication and disclosure policy or supporting annex, which you have not already mentioned, please detail it here:

No further comments