



Community
Pharmacy
Scotland

CPS response to the GPhC Consultation on revised threshold criteria

Prepared by:

Amanda Rae
Head of Policy & Development
amanda.rae@cps.scot

Who are Community Pharmacy Scotland (CPS) & what do they do?

Who we are

We are the organisation which represents community pharmacy contractor owners in almost every aspect of their working lives, and are the voice of these vital healthcare professionals as they deliver pharmaceutical care to the people of Scotland.

We are empowered to represent the owners of Scotland's 1256 community pharmacies and negotiate on their behalf with the Scottish Government. This covers all matters of terms of service and contractors' NHS service activity including remuneration and reimbursement for the provision of NHS pharmaceutical services.

What we do

We work with the Scottish Government on the development of new pharmaceutical care services and ensure that the framework exists to allow the owners of Scotland's community pharmacies to deliver these services.

The Scottish community pharmacy contract puts the care of the individual right at its centre and with its focus on pharmaceutical care and improving clinical outcomes, community pharmacy contractors and their employee pharmacists are playing an increasingly important role in maximising therapeutic outcomes and improving medicine safety. Community pharmacy is at the heart of every community and plays an important part in the drive to ensure that the health professions provide the services and care the people of Scotland require and deserve.



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We are particularly interested in your views on the following points, although we welcome your comments on any issues that you want to raise about the proposed threshold criteria.

General

1. The Pharmacy Order 2010 allows us to have threshold criteria, which help us decide whether a case should be referred to the investigating committee. Do you think the proposed threshold criteria are clear and understandable?

Yes

Please explain why

The present threshold criteria have been in place since 2010, and are linked to the seven principles set out in the Standards of Conduct, Ethics and Performance (2012). The proposed criteria take account of the new standards for pharmacy professionals due to be introduced in May 2017.

The proposed criteria are clear and simple, making it straightforward to assess where they have been met. In addition, they are significantly reduced in number to the current and take account of the new standards, matching clearly to these.

2. The criteria are used by decision-makers within the GPhC who are involved in investigating concerns to decide whether the case should be referred to the investigating committee. Do you think how we apply the criteria in practice is clear?

Yes

Please explain why

The process of application of the criteria is clear.

The Pharmacy Order 2010 allows the council to define the threshold criteria which the registrar (and people delegated by the Registrar) use to determine whether to refer a case to the Investigating Committee (IC).

Where there is an allegation of impairment in a pharmacy professional's fitness to practice pharmacy professional's fitness to practice, this must be assessed against the threshold criteria. These are clearly defined under the heading of conduct, behaviour and health. If the allegation is of a type stated in the Threshold Criteria, it is not referred to the IC.

3. The criteria give us a framework to make sure we make proportionate, fair and consistent decisions in all investigations. Do you think the proposed threshold criteria will make sure the right cases are referred to the investigating committee?

Yes

Please explain why

The consultation document clearly defines the criteria under the headings of conduct, behaviours and health. They are simple and clear and fit with the new standards for Pharmacy Professionals

The consultation also details where the Threshold Criteria fit as one part of the decision-making process, and their application when an investigation is complete. Where any of the Threshold Criteria are not met, public interest considerations are then taken into account by the registrar before a final decision on referral to the IC is made.

All the above will support proportionate, fair and consistent decisions during investigations.



Other Comments

4. Do you have any other comments on the proposed criteria?

No further comment.