



## Community Pharmacy Wales response to the General Pharmaceutical Council consultation on

### **Revalidation for Pharmacy Professionals**

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## Part 1: Introduction

Community Pharmacy Wales (CPW) represents community pharmacy on NHS matters and seeks to ensure that the best possible services, provided by pharmacy contractors in Wales, are available through NHS Wales. It is the body recognised by the Welsh Assembly Government in accordance with *Sections 83 and 85 National Health Service (Wales) Act 2006* as 'representative of persons providing pharmaceutical services'.

Community Pharmacy Wales is the only organisation that represents every community pharmacy in Wales. It works with Government and its agencies, such as local Health Boards, to protect and develop high quality community pharmacy based NHS services and to shape the community pharmacy contract and its associated regulations, in order to achieve the highest standards of public health and the best possible patient outcomes. CPW represents all 717 community pharmacies in Wales. Pharmacies are located in high streets, town centres and villages across Wales as well as in the major metropolitan centres and edge of town retail parks.

In addition to the dispensing of prescriptions, Welsh community pharmacies provide a broad range of patient services on behalf of NHS Wales. These face to face NHS Wales services, available from qualified pharmacists 6 and sometimes 7 days a week, include, Medicine Use Reviews, Emergency Contraception, Discharge Medicines Reviews, Smoking Cessation, Influenza Vaccination, Palliative Care Medicines Supply, Emergency Supply, Substance Misuse and Common Ailments services.

As part of the strategic development of the community pharmacy network across Wales, and to meet growing demand, pharmacy professionals will be involved in the provision of a growing number of professional services and it is essential, from a CPW perspective, that the Welsh Government, commissioners, the public and other stakeholders have complete confidence that these services will be delivered by healthcare professionals that have the required skills and have a duty to continually keep their knowledge up to date.

CPW is hopeful that the introduction of a robust system of revalidation for pharmacy professionals will provide commissioners with the confidence to let go of the additional and often complex accreditation arrangements that they have put in place. These additional arrangements seek to provide them with the reassurance of competence that they require when they invest tax payer's money into community pharmacy services. CPW see the introduction of a process of revalidation to be an extremely positive move, that will hopefully go some way to providing stakeholders and service users with an element of the reassurance they require. It is from this perspective that CPW has framed its response to the issues raised in the consultation

CPW is pleased to have the opportunity to respond to this important consultation on proposals for a future revalidation process.

## Part 2: The revalidation process

CPW has been reassured by the way that the General Pharmaceutical Council has developed its proposals for revalidation and the opportunities that have been provided to the membership and other stakeholders to input into the thinking. Representatives from CPW and members of the CPW Board have attended consultation events and some have been actively involved in the pilot process. CPW is also pleased that the development of the proposals has not been a desktop exercise and significant time has been spent testing, piloting and evaluating the proposals over a three year period.

The concept of revalidation is well understood by NHS Wales, commissioners, employers and a significant proportion of the public, following its introduction into the practice of registered General Practitioners and other healthcare professionals and CPW fully supports the introduction of revalidation for pharmacy professionals.

CPW recognises that these proposals are a first step to introducing effective revalidation and while the proposed changes are of themselves simple changes, they will help pharmacy professionals adopt a higher degree of reflective practice. CPW is also pleased to see that the proposed changes will be achieved without the introduction of significant additional administrative burden and will not therefore take pharmacy professionals away from service delivery.

CPW's initial concerns about the practicality of remote isolated pharmacy professionals struggling to set up a meaningful peer discussion have been allayed by the reassurance that these discussions can be conducted by telephone. It is important that more isolated pharmacy professionals and locum pharmacists are made aware of the different options available to them to secure meaningful peer support. CPW is also pleased to see that the need for 'dual recording' has been avoided through a willingness to work with organisations and companies that have their own learning and development portfolio arrangements. With such a wide range of such systems in place it is important for the GPhC to start to map these systems and implement solutions the minimum of delay if deadlines are to be met.

CPW believes that the proposed timescales for the change are sufficient to allow for a smooth transition to the revised arrangements and time for organisations to put support mechanisms in place.

CPW is encouraged by the GPhC's intention to provide supporting guidance and examples to help registrants understand the requirements of the reflective

account and peer discussion. In recognition of the fact that the value of the peer discussion will be affected by the ability of the peer to carry out their role effectively, CPW would encourage the GPhC to ensure that appropriate guidance is also available for those undertaking the role of 'peer' in the peer discussion. CPW feel that it is essential if meaningful reflection is to happen that all employers are aware that the 'peer discussion' must not become integrated with any internal appraisal and review processes and that line managers should not be involved in peer discussions unless they have received a direct request from the registrant to do so.

While CPW agrees that it is operationally practical to ask for records to be submitted at the time of annual renewal of their registration, CPW would not wish to see pharmacy professionals' ability to deliver services inadvertently affected by them not being fully prepared for the renewal process. CPW would therefore recommend that the GPhC write to all registrants three months before the renewal date to remind them of their renewal date and the elements that will need to be in place to process their renewal. As pharmacy professionals are extremely busy individuals, and could be on holiday or an extended period of absence when the renewal reminder arrives, CPW would recommend that they are provided with a reasonable window in which to make their submission and that the individual elements can be submitted in a staged way if required within that submission window.

If the revalidation process is to be meaningful for registrants then the quality and timeliness of feedback on their portfolio submission will have a direct impact on their learning. CPW is aware that the quality of feedback on the current CPD submission process has not always met the needs of registrants and would strongly recommend that the GPhC look to improve this aspect. As many pharmacy professionals work outside of traditional practice it is important that the breadth and experience of reviewers is sufficient to cope with a wide range of roles.

While CPW is aware that there may be a need to take remedial action on an individual registrant, we would wish to ensure that all avenues are fully explored before a registrant is taken away from the provision of patient care. Where the registrant is an employee this should involve partnership working with the employer to support the registrant where this is required. CPW would also expect, in the interests of fairness, for a registrant to be able to seek representation support through any review and remedial action process.

### Part 3: Conclusion

CPW is fully supportive of the introduction of revalidation for pharmacy professionals as it brings the profession into line with other primary care professions and provides a degree of reassurance to those who commission and use community pharmacy services that the service is provided by a pharmacy

professional who keeps their skills up to date and has the required knowledge to provide the service.

CPW does however see the changes that are currently proposed as a first step on a longer journey to effective revalidation.

CPW agree that the content of this response can be made public.

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CPW welcomes communication in either English or Welsh.

For acknowledgement and further Contact:

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