Inquiry into regulation of care for older people

National Pharmacy Association Ltd

The National Pharmacy Association (NPA) is the largest trade association for community pharmacy. It represents the full spectrum and vast majority of community pharmacy owners in the UK. Our members include nationwide pharmacy multiples, regional chains and independent pharmacies. The NPA has a long tradition of caring for the needs of our members and in turn the patients they care for. Since 1921 the NPA has supported members through the constant challenges facing community pharmacy. The spread of large and small NPA member companies, our UK-wide geographical coverage, and our remit for NHS and non-NHS affairs means that we are uniquely fully representative of the community pharmacy sector. In addition to being a representative voice, we provide members with a range of commercial and professional services to help them maintain and improve the health of the communities they serve.

The NPA is a member of Pharmacy Voice which is also fully supportive of the principles in this response.

Pharmacy Voice (PV) represents community pharmacy owners. Its founder members are the Association of Independent Multiple pharmacies (AIMp), the Company Chemists’ Association (CCA) and the National Pharmacy Association (NPA). The principal aim of Pharmacy Voice is to enable community pharmacy to fulfill its potential and play an expanded role as a healthcare provider of choice in the new NHS.

The NPA is well placed to comment on this inquiry as the organisation is the major provider of professional indemnity insurance to the profession. We therefore have a unique understanding of the risks involved with delivering community pharmacy services.

The NPA welcomes this opportunity to respond to this inquiry and would be pleased to meet with Scottish Parliament Health and Sport Committee to discuss further the points made in this document. The NPA agrees for this response to be made public.

Community pharmacists are highly trained healthcare professionals who have successfully completed a 4 year degree course to MSc (Pharm) level plus a further preregistration year of work experience in community or hospital pharmacy. At the end of the year they have to pass further exams as well demonstrating that they have necessary skills competences to practice as a pharmacist. As healthcare professionals pharmacists are bound by their Code of Ethics, Medicines, Ethics and Practice, the first ethic is to ensure the wellbeing of patients and the public.

Community pharmacies are accessible and convenient to the public and are available in most urban and rural communities throughout the country. Many
Pharmacies offer extended opening hours over weekends and evenings when access to other healthcare professionals is limited.

Pharmacies traditionally offer NHS services (primarily the supply of medicines but increasingly a range of clinical and public health services) and medicine sales. Pharmacy services also offer advice and the provision of medication for specific groups of patients including the elderly living in care homes, in assisted living accommodation and those living with supportive care at home. Every community pharmacy will have a nominated Responsible Pharmacist who is responsible for securing the safe and effective running of the pharmacy. The community pharmacists must be registered with their regulatory organisation the General Pharmaceutical Council, as will each premise operating as a pharmacy. The General Pharmaceutical Council (GPhC) requires members to adhere to standards relating to conduct, ethics and performance, continuing professional development and to have appropriate indemnity insurance. GPhC inspectors also inspect pharmacy premises to ensure they meet the required standard. For pharmacies to offer NHS pharmacy contract services the pharmacy owner will have entered into a contract with the local NHS Board which places an obligation on the pharmacy contractor to provide services to detailed specifications.

**Does the regulatory system ensure care services for older people are providing good quality and appropriate care?**

The NPA recognises the need for Regulation of Care of older people in Scotland to protect the elderly public by ensuring services are operated to sufficient standards by competent health care providers. Pharmacy is already a tightly regulated pharmacy profession which ensures pharmacy services provide appropriate safe care to all including the elderly public and is concerned that excessive regulation may be to the detriment of community pharmacy, patients and the NHS.

The NPA agrees that regulation should be proportionate to risk for the service users. The public need to be safeguarded against inappropriate services being offered by non-competent health service providers. However measures put in place must ensure equitable and quality services are provided which benefit individual health and if possible contribute positively to Scotland’s National health statistics without burdening NHS Scotland or the providers.

Over rigorous, costly or duplication of regulation will disincentive the development or uptake of services which could potentially benefit patients and the NHS. The NPA is aware that elderly patients and their carers gain enormous benefit from accessing pharmacy services including the Minor Ailment Service, the Public Health Service, The Acute Medication Service and the Chronic Medication service. Patients are also supported to take their medication through the provision of medicine compliance aids and care home services. Pharmacy services provision of medicine advice, medication charts and medicine administration systems often extend independent living for patients reducing the burden on local care home provision.
When pharmacy services are provided to care homes the staff and patients benefit from the medicine expertise of pharmacists who are informed and readily available. The provision of monitored dosage systems requires intensive pharmacy preparation and checking time, and Pharmacists respond to medication changes in a prompt and timely manner.

Effective regulation is already in place for the safe operation of services offered by pharmacy to elderly patients. Pharmacy premises, pharmacists and pharmacy technicians, are heavily regulated by the General Pharmaceutical Council. The regulation includes the maintenance of standards for;

- Conduct, ethics and performance
- Pharmacy owners and superintendents
- Continuing professional development
- Education and training
- Proficiency
- Premises

The General Pharmaceutical Council will monitor and secure compliance of these standards through inspection visits, withholding, rescinding or withdrawing registration for non compliance. Any further regulation would be unnecessary duplication which would place financial and bureaucratic burden on community pharmacists with no additional benefit to the service users.

Registered pharmacists have a duty regulated by the General Pharmaceutical Council to make sure all services they provide are safe and of acceptable quality, with full records, regular review and risk assessments to protect patient and public safety and to improve service provision.

There may be other health professionals who do not have the standards set by this level of regulation who may require additional statutory regulation for the provision of care to the elderly.

The NPA believes that community pharmacy delivers pharmaceutical care to the National Care Standards:

Care at Home standard 8- Keeping Well-medication. If your service includes help with taking your medication, the provider has arrangements in place for this to be done safely and in the way that suits you best.

Care Homes for Older People standard 5- Management and staffing arrangements.

You experience good quality support and care. This is provided by management and staff whose professional training and expertise allows them to meet your needs. The service operates in line with all necessary legal requirements and best-practice guidelines.
Care Homes for Older People standard 15—Keeping well and medication. If you need to take medication, staff know this and there are arrangements in place for you to take your medication safely and in the way that suits you best.

In addition the Royal Pharmaceutical Society (RPS) has recently published guidance for all healthcare professionals working at the interfaces of care with patients who are transferring between primary and secondary care including transfer in and out of residential care. This is a point in time when errors can occur with the transfer of medication and offers best practice guidance.

Pharmacy provides professional expertise to enable other agencies to meet these standards to assist in the delivery of excellent pharmaceutical care. The NPA would welcome working with Social Care and Work Improvement Scotland with regards to medicine advice and provision to benefit patients and community pharmacy services.

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24 August 2011

References
4 Keeping patients safe when they transfer between care providers – getting the medicines right Royal Pharmaceutical Society 2011 http://www.rpharms.com/support-tools/transfer-of-care.asp