NHS Governance - Clinical Governance

National Pharmacy Association

The National Pharmacy Association (NPA) is the not for profit trade body which represents the majority of independent community pharmacy owners in Scotland and across the UK. We support community pharmacy teams to succeed professionally for the benefit of patients. We provide our members with personalised advice on clinical, practice and legal issues and provide a wealth of resources on all professional and business matters including pharmacy services development, monitoring and review.

We welcome the opportunity to respond to the Scottish Parliament Health and Sport Committee Inquiry into NHS Clinical Governance as we believe ensuring clinical governance of NHS services is paramount to providing safe, effective and patient centred care in all clinical aspects including pharmaceutical care. We have limited our comments to those we consider relevant for our members as community pharmacy owners and their staff and patients.

The NPA encourages and supports members across the UK to monitor and continuously improve the quality of all patient services they provide from their community pharmacy including those services in the National Health Service (Pharmaceutical Services) (Scotland) Regulations 2009. Community Pharmacy owners, pharmacists and pharmacy teams are supported in their risk management and quality assurance of patient care by the Scottish Pharmacy Negotiating Body, Community Pharmacy Scotland, NHS Primary Care Pharmacy Development teams and the direction of the professional body for pharmacists, The Royal Pharmaceutical Society. The NPA support members by providing comprehensive practice development and audit tools, Human Resources and Health and Safety resources, indemnity cover and accessible clinical or legal support available at any time.

The NPA, as the main UK provider of indemnity insurance to pharmacy owners, has expert experience of dealing with patient complaints and claims for dispensing errors and other breaches of professional duty in pharmacy and strongly believes that NHS care accessed from independent community pharmacy is safe, effective and evidence based. Based on our experience of handling indemnity claims we believe independent community pharmacy service users are and can remain confident in the safety and quality of NHS Pharmaceutical Care Services.

The Scottish Government Review of the Community Pharmacy Public Health Service for Smoking Cessation and Emergency Hormonal Contraception in 2011 concluded that “users of community pharmacy based health initiatives express a high level of satisfaction”. The NPA believes that the robust procedures for encouraging patient feedback and managing complaints with NHS services in community pharmacies, brought about by the Patient Rights (Feedback, Comments, Concerns and
Complaints) (Scotland) Directions 2012\textsuperscript{vii} and also the NHS Scotland Confidential Alert Line\textsuperscript{viii} will provide further evidence of the safety and of patient confidence in NHS Community Pharmacy Services. The success and continued development of the work of the Pharmacy in Primary Care Collaborative\textsuperscript{ix} within the Scottish Patient Safety Programme\textsuperscript{x} has to be commended as driving quality improvement for NHS pharmaceutical services. The introduction of a culture of improving the “patient safety climate”\textsuperscript{xii} for community pharmacy encourages innovation in community pharmacy practice development and will improve monitoring of patient safety. This is a different concept to the clinical governance tasks applied to English pharmaceutical contractors which amount to significant bureaucratic burden.

Integrated Authorities\textsuperscript{xii} in future will be responsible for the development, implementation and governance of services which will impact community pharmacy patients. The NPA would encourage these partnerships to include local community pharmacy owners in their scoping and development of service provision.

NHS pharmacy patient care services have been widening in scope for over a decade with the pharmacist’s medicine expertise and accessibility of community pharmacies being greater utilised in planning efficient NHS services. The NPA welcomed the acknowledgement by the Scottish NHS Chief Medical Officer in her 2015/16 report Realising Realistic Medicine\textsuperscript{xiii} of the contribution made by pharmacists providing NHS pharmaceutical care to improve the health of the Scottish population.

The NPA believes the professionalism of the actions by community pharmacy owners when outcomes are not perfect, demonstrate that community pharmacy has the correct procedures in place, whether the problem is identified by the pharmacy team, the patient, the NHS or the pharmacists and premises regulator, The General Pharmaceutical Council\textsuperscript{xiv}.

Procedures for reviewing and monitoring clinical governance are embedded in community pharmacy practice and the NPA would urge the NHS to ensure any changes to clinical governance would be appropriate to the working environment of community pharmacy teams and developed in consultation with community pharmacy owners.

The NPA Scotland Representation Manager is available to discuss any aspect of this response at the convenience of the Health and Sport Committee

\textsuperscript{i} www.legislation.gov.uk/ssi/2009/183/contents/made
\textsuperscript{ii} www.communitypharmacyscotland.org.uk/
\textsuperscript{iii} www.communitypharmacy.scot.nhs.uk/nhs_boards.html
\textsuperscript{iv} www.rpharms.com/making-a-difference/scotland
\textsuperscript{v} www.gov.scot/Publications/2011/11/25084749/3
\textsuperscript{vii} www.sehd.scot.nhs.uk/mels/CEL2012_08.pdf
\textsuperscript{viii} www.gov.scot/Topics/Health/NHS-Workforce/Employee-Experience/NHS-staff-alert-line