



PSNC's response to the General Pharmaceutical Council's consultation on guidance for pharmacist prescribers

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Introduction

The Pharmaceutical Services Negotiating Committee (PSNC) promotes and supports the interests of all NHS community pharmacies in England. We are recognised by the Secretary of State for Health as the body that represents NHS pharmacy contractors. We work closely with Local Pharmaceutical Committees (LPCs) to support their role as the local NHS representative organisations.

Our goal is to develop the NHS community pharmacy service, and to enable community pharmacies to offer an increased range of high quality and fully funded services; services that meet the needs of local communities, provide good value for the NHS and deliver excellent health outcomes for patients.

We welcome the opportunity to be able to provide our response to the proposals set out in the General Pharmaceutical Council's consultation on guidance for pharmacist prescribers.

Consultation questions

Key areas for safe and effective prescribing

1. **Have we identified all the necessary areas for ensuring safe and effective care is provided?**
Yes.
2. **For each of the nine key areas, do you agree or disagree with the guidance we have proposed?**
 1. **Taking responsibility for prescribing safely** – agree
 2. **Keeping up to date and prescribing within your level of competence** – agree
 3. **Working in partnership with other healthcare professionals and people seeking care** – agree
 4. **Prescribing in certain circumstances** – agree
 5. **Prescribing non-surgical cosmetic medicinal products** – agree
 6. **Remote prescribing** – agree
 7. **Safeguards for the remote prescribing of medicinal products** – agree
 8. **Raising concerns** – agree
 9. **Information for pharmacy owners and employers of pharmacist prescribers** – agree
3. **Please explain your responses to the two questions above**
PSNC is supportive of the outlined principles that underpin safe prescribing and believes they will appropriately support the effective provision of pharmaceutical care and medicines.

Prescribing safely

4. **Do you agree or disagree that these are circumstances when a pharmacist prescriber must decide whether they can prescribe safely for a person?**
Agree.
5. **Are there any other circumstances when a pharmacist prescriber must decide whether they can prescribe safely for a person?**
Don't know.
6. **Please explain your responses to the two questions above and describe any additional circumstances that should be considered.**

Application of the guidance should ensure that pharmacists are prescribing safely and providing patient-centred care. It is possible that other scenarios will occur when a pharmacist prescriber must decide whether they can prescribe safely for a person, but we believe that the scenarios outlined in section 3.1 adequately reflect the majority of circumstances.

Prescribing and supplying

- 7. Are there any other circumstances where you think a pharmacist prescriber should be able to prescribe and supply?**

No.

- 8. Please describe any additional circumstances that should be considered.**

N/A.

Safeguards for the remote prescribing of certain categories of medicines

- 9. Are there any other safeguards that should be put in place to make sure that certain medicines are prescribed safely?**

No.

- 10. Please describe any additional safeguards you think there should be**

N/A.

Impact of the proposals

- 11. What kind of impact do you think our proposals will have on patients and the public?**

Positive impact. Greater protection to patients and the public.

- 12. What kind of impact do you think our proposals will have on pharmacist prescribers?**

Positive impact. More robust set of principles and guidance to follow when prescribing. The principles also empower pharmacist prescribers to provide the safest and most effective care to patients.

- 13. What kind of impact do you think our proposals will have on other pharmacy professionals?**

Positive impact. They will help to provide greater confidence in the practice of pharmacist prescribers and clarity on what is expected of them.

- 14. What kind of impact do you think our proposals will have on employers or pharmacy owners?**

Positive impact. These proposals will add an extra layer of governance to the prescribing process which will ensure that patients are receiving safe and appropriate services. The added governance may also reduce the risks of inappropriate prescribing and reduce the likelihood of complaints and/or litigation against a pharmacy owner.

- 15. Please give comments explaining your responses to questions 11 to 14**

Increase in safety and effectiveness of pharmacist prescribing as a result of adhering to the proposed principles will benefit all parties involved. See specific comments above.

Equality impact

- 16. Do you think our proposals will have a negative impact on certain individuals or groups who share any of the protected characteristics listed below?**

None.

- 17. Do you think any of our proposals will have a positive impact on certain individuals or groups who share any of the protected characteristics listed below?**

All.

- 18. Please describe the impact on each of the individuals or groups you have ticked in questions 16 and 17**
The proposals are likely to equally benefit all parties concerned by increasing the safety, effectiveness and quality of patient care regardless of whether they share any of the protected characteristics.