



# Community Pharmacy England's Response to DHSC's Consultation on Pharmacy Technicians using Patient Group Directions (PGDs).

September 2023

## About Community Pharmacy England

**We are the voice of community pharmacy in England, representing all 11,000+ community pharmacies across the country.**

We exist to represent all community pharmacies – our members – in negotiations with the Government and the NHS. We are responsible for negotiating the NHS Community Pharmacy Contractual Framework (CPCF), currently around £2.592 billion per year, under which all NHS community pharmacies operate.

We are recognised by the Secretary of State for Health and Social Care 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, to enable community pharmacies to offer an increased range of high-quality and fully funded services that meet the needs of their local communities and provide value and good health outcomes for the NHS and the public.

The aim of the Department of Health and Social Care's (DHSCs) consultation on PGD use by registered Pharmacy Technicians is to maximise the use of the skill mix in pharmacy teams, which will enable them to address their local population's health needs more efficiently. This will free up time for Pharmacists to deliver more patient-facing clinical services.

✉ [info@cpe.org.uk](mailto:info@cpe.org.uk)  
☎ 0203 1220 810  
📍 14 Hosier Lane, London EC1A 9LQ  
🌐 [cpe.org.uk](http://cpe.org.uk)

Community Pharmacy England is the operating name  
of the Pharmaceutical Services Negotiating Committee.



## Proposal Introduction

DHSC states that registered Pharmacy Technicians using PGDs will provide patients with better opportunities to access medicines and treatment when they are needed and remove the need for referrals to other healthcare professionals.

Under current legislation, the only mechanism by which registered pharmacy technicians can supply and administer medicines is where they are authorised to do so by a PSD. As registered healthcare professionals, this does not fully utilise the skills and knowledge of registered pharmacy technicians who could use their education and training to supply and administer medicines safely under a PGD.

An amendment to the Human Medicines Regulations 2012 (HMRs) is proposed that will add registered Pharmacy Technicians to the list of healthcare professionals who can provide and/or administer medicines directly to a group of patients with an identified clinical condition.

Registered Pharmacy Technicians will be required to undertake additional training as per the requirements of each individual PGD.

## Our response to the consultation.

### Consultation questions

**Do you agree or disagree with the proposal to amend the Human Medicines Regulations (2012) to enable pharmacy technicians to supply and administer medicines to patients using PGDs?**

- Agree
- Disagree
- Don't know

### Consultation response:

**Agree** – *The other healthcare professionals listed within the HMRs are all registered professionals and Pharmacy Technicians would be a suitable addition to this list.*

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**Do you agree or disagree that the 2-year pre-registration training equips pharmacy technicians with the appropriate knowledge and skills to complete the training requirements which allow them to use PGDs?**

- Agree
- Disagree
- Don't know

**Consultation response:**

**Agree** – *Pharmacy Technicians undergo education and training to become professionals registered with the GPhC. Their education and training provide the key skills, knowledge and accountability required for the safe and effective provision of clinical services under PGDs, as appropriate to the specific PGD.*

**Do you agree or disagree that allowing pharmacy technicians to supply and/or administer under a PGD will enable safe access to medicines for patients?**

- Agree
- Disagree
- Don't know

**Consultation response:**

**Agree** – *Pharmacy Technicians are held to the same standards as Pharmacists as registrants with the GPhC. Pharmacy Technicians have also been recognised in legislation to provide the Hypertension Case Finding Service which shows they can provide services safely.*



This proposal is to allow registered pharmacy technicians to supply and administer medicines using a PGD.

**Do you have additional information in support of this proposal?**

**Consultation response:**

*Community Pharmacy England supports this proposal, and this is a start in showing what Pharmacy Technicians can do. The inclusion of registered Pharmacy Technicians in the list of healthcare professionals in HMRs seems to be a step closer to establishing the Pharmacy Technician role as an integral part of the community pharmacy team.*