

Control of Entry Arrangements
Scottish Government Health Directorate
Pharmacy Medicines Division
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15 January 2014

Dear Sir/Madam

A consultation on the Control of Entry Arrangements and Dispensing GP Practices

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in Great Britain. It is our job to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmaceutical services in England, Scotland and Wales.

We welcome the opportunity to respond to the consultation document on control of entry arrangements and dispensing GP practices.

Whilst the consultation document as a whole is of interest to us, we have limited our response to comments where we feel our work is directly relevant to the proposals. We are happy to continue to contribute to future discussion and work in this area.

Patients across Scotland rightly expect consistent standards to apply regardless of where they receive their pharmaceutical service and should be able to safely and effectively access the services they require. While it is not for the GPhC to comment on the detail of control of entry arrangements and application processes to provide NHS pharmaceutical services in Scotland, we support the overarching themes of improving engagement with local communities, responding to changing population and clinical care priorities, and ensuring transparent decision making, that are outlined in the consultation document.

The GPhC sets standards for registered pharmacies. The purpose of these standards is to create and maintain the right environment, both organisational and physical, for the safe and effective practice of pharmacy. These standards apply to all pharmacies registered with the GPhC and can read in full at <http://www.pharmacyregulation.org/standards/standards-registered-pharmacies>.

Pharmacies in Great Britain are required to register with the GPhC in order to sell and supply pharmacy or prescription only medicines. We use a two stage approach in deciding whether to register premises as a pharmacy. Stage 1 is an eligibility test based on the legal definition of a retail pharmacy business and the legal definition for the sale and supply of pharmacy and prescription only medicines. To decide if premises are eligible to register as a pharmacy we will ask whether the pharmacy services will include the sale of pharmacy medicines

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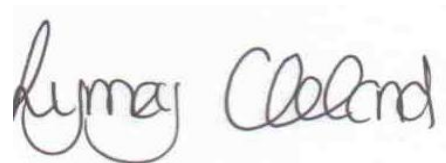
and/or the supply of prescription only medicines against a prescription. If the answer is no, we will not register the premises as a registered pharmacy. Stage 2 is a compliance test based on the ability of the premises to meet our standards for registered pharmacies.

Dispensing GP practices are not regulated by the GPhC and are not subject to our standards. However, we believe patients should have a right to expect that they receive equally high quality of services and that consistent standards apply regardless of where they receive their pharmaceutical services. We have ongoing positive liaison with the Dispensing Doctors Association about the standards we set for registered pharmacies and their professional guidance and advice to dispensing GPs. We also fully support the principle outlined in Prescription for Excellence, that collaborative working between GPs and pharmacists, wherever possible, provides the best care for patients.

While the process of registering a pharmacy with the GPhC is independent from the process of a pharmacy seeking to provide NHS pharmaceutical services, we are keen to ensure that our regulatory functions take account of the diverging healthcare systems and delivery models for pharmacy services across Great Britain and wish to continue to work closely with Scottish Government, NHS Boards and other relevant stakeholders to ensure that our regulatory approach reflects and responds to the changing local context.

If you would like further information on the points made in this response, or any other aspects of the GPhC's work please do not hesitate to contact me on the details provided below.

Yours sincerely



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