



Royal Pharmaceutical Society of Great Britain

Helping pharmacists achieve excellence

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Dear Sir/Madam

Re- Consultation on HPC Standards of conduct, performance and ethics

I write on behalf of the Royal Pharmaceutical Society for Great Britain (RPSGB) in response to the above consultation.

The RPSGB is the professional and regulatory body for pharmacists in England, Scotland and Wales. It also regulates pharmacy technicians on a voluntary basis, a role that is expected to become statutory under new legislation soon. The primary objectives of the RPSGB are to lead, regulate, develop and represent the profession of pharmacy.

Having recently conducted a fundamental review of our Code of Ethics for pharmacists and pharmacy technicians, the Society welcomes the opportunity to respond to this consultation.

We agree that the standards meet the principles outlined in page 2 of the consultation document and that the introduction clearly explains the role and purpose of the standards.

The following are comments that we would wish to make on the standards set out in the consultation document-;

- **Standard 4- You must provide important information about your conduct and competence.** The Society notes that the requirement for registrants to inform you about changes to their health has been removed. While the Society recognises that an appropriate balance must be sought with regard to the information that registrants are required to provide about changes to their health, we believe that it is important that regulators are informed of circumstances that may call a registrant's fitness to practise into question. Our revised Code of Ethics requires that pharmacists and pharmacy technicians must;

Practise only if you are fit and competent to do so. Promptly declare to the Society, your employer and other relevant authorities any circumstances that may call into question your fitness to practise or bring the pharmacy professions into disrepute, including ill health that impairs your ability to practise, criminal convictions and findings by other regulatory bodies or organisations.

- Standards 8- You must effectively supervise tasks you have asked others to carry out. The Society agrees that every registered professional is accountable for their own actions. When working as part of a team we believe that professionals remain accountable for their own decisions, behaviour and any work done under their supervision. Our revised Code of Ethics requires that pharmacists and pharmacy technicians must;

Take responsibility for all work done by you or under your supervision. Ensure that individuals to whom you delegate tasks are competent and fit to practise and have undertaken, or are in the process of undertaking, the training required for their duties.

- Standard 9- You must get informed consent to give treatment (except in an emergency). We would suggest that consideration be given to including a statement on respecting a patient's right to refuse treatment, care or other professional services. Reference could also be made to providing the information that patients require to make a decision about treatment in a way that they can understand. In addition we would suggest that further consideration be given to the wording of the paragraph about making reasonable efforts to persuade someone who refuses treatment that is necessary for their wellbeing. It is imperative that patients are advised of the benefits of providing consent to treatment, the risks involved and the implications of not providing consent. However patients with capacity have a right to be involved in decisions about their health and have a right to refuse treatment, even if that refusal results in harm. Health professionals must ultimately respect the right of patients who are legally capable of making decisions about their care to refuse treatment, even where they think the decision is wrong.

With regard to any additions to the standards in the consultation document, we note that there is no reference to the action that registrants should take if providing a particular service conflicts with their religious or moral beliefs. We would suggest that consideration is also given to a requirement for registrants to ensure that all professional activities they undertake are covered by appropriate professional indemnity arrangements.

Finally we note that the document interchanges between the phrases 'You must..' and 'You should..'. The Society's Code of Ethics contains professional requirements that pharmacists and pharmacy technicians are required to abide by irrespective of the job they do and we have used the term 'You must..' throughout. However, we have also produced supporting professional standards and guidance documents to expand on aspects of the Code, or provide more detailed guidance on specific areas of practice. These documents contain a mixture of professional requirements and good practice guidance. At the start of each document we have explained that the word 'must' has been used to denote mandatory professional standards and the word 'should' has been used to denote guidance on good practice, which registrants should follow in all normal circumstances. A similar approach would be helpful in clarifying the status of requirements in the Standards document.

We hope that you find our comments useful. Should you wish to discuss any of the matters we have raised please do not hesitate to contact us.

Yours sincerely

Lynsey Cleland
Head of Professional Ethics