

Licensing Providers of NHS Services  
Department of Health  
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Whitehall  
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Dear Sir/Madam

**Protecting and promoting patients' interests – licensing providers of NHS services**

We welcome the opportunity to respond to this consultation. Whilst the proposals and the consultation as a whole are of interest to us, we have limited our response to comments those areas which have a direct relevance to us.

**Introduction**

The General Pharmaceutical Council (GPhC) was established in 2010 as the independent regulator for pharmacists, pharmacy technicians and registered pharmacies 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 by upholding standards and public trust in pharmacy. Our statutory responsibilities are set out in the Pharmacy Order 2010. These include:

- approving qualifications for pharmacists and pharmacy technicians and accrediting education and training providers;
- maintaining a register of pharmacists, pharmacy technicians and pharmacy premises;
- setting standards for conduct, ethics, proficiency, education and training, and continuing professional development (CPD);
- establishing fitness to practise requirements, monitoring pharmacy professionals' fitness to practise and dealing fairly and proportionately with complaints and concerns.

In addition to these responsibilities around health professional regulation, we are responsible for establishing and promoting standards for the safe and effective practice of pharmacy at registered pharmacies. Our legislation provides us with a range of powers including the power to issue improvement notices, place conditions on a pharmacy's registration or ultimately remove them from registration. These powers are expected to be fully implemented in 2013.

**Proposed exemptions from requirement to hold a licence from Monitor**

The GPhC recently held a wide ranging consultation on its proposed standards for registered pharmacies. Respondents expressed some concern at the possibility of duplication of monitoring requirements between the GPhC and other regulators or NHS bodies.

We note that under the proposed NHS licensing arrangements outlined in the consultation document community pharmacies would be exempt from the requirement to hold a licence from Monitor. The GPhC is committed to avoiding duplication and is happy to work with Monitor, with other regulatory bodies and with NHS organisations to identify areas of duplication and overlap. This includes exploring opportunities to share monitoring information where relevant in order to inform a focused and proportionate regulatory approach and to ensure that the regulatory burden placed on pharmacy professionals and owners of registered pharmacies is not increased unnecessarily.

We note that, during the next Parliament, the Government intends to carry out a full review of how the licensing regime is operating and that providers who were initially exempt could be brought within the scope of licensing. We would welcome the opportunity to contribute to that process as well as any early review which could have an impact on the work we currently undertake setting standards and inspecting pharmacies to test compliance with them.