



THE INSTITUTE OF PHARMACY MANAGEMENT

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GPhC Consultation
Council for Healthcare Regulatory Excellence
11 Strand
London
WC2N 5HR

Mr Bob Nicholls
Chairman Designate
General Pharmaceutical Council
1 Lambeth High St
London
SE1 7JN

Dear CHRE/ Mr Nicholls,

GPhC Standards Consultation

I write on behalf of the Institute of Pharmacy Management, a non-profit company limited by guarantee with professional and educational interests regarding the recent standards consultation to make some suggestions that the response document does not allow for.

1 We are unclear about the future status of existing RPSGB guidance and Code of Ethics as only a few standards appear to have been considered. We suggest that the GPhC should initially adopt existing RPSGB standards and then take an evolutionary approach in priority order rather than a revolutionary one starting from scratch. This way, the GPhC will be using the framework of what was seen as an exemplary regulator by PRLOG. The standards fit together better than these proposed and have a common style.

GPhC should build on RPSGB's' strengths, rather starting afresh and creating concern and uncertainty It should add new standards necessary for the wider role of GPhC in regulating owners also in a common style

2 The documents issued are too long and detailed and require a lot more editorial work on standardization and modification, especially to reflect the fact that pharmacists and technicians are different

and have different responsibilities, knowledge and training. A Common Code of Ethical Principles is acceptable but standards must differ in many areas of practice,

3 The response form has very few questions and some go beyond the standards documents. We therefore feel unable to give the detail of these important documents the attention they deserve. We have tried to do so as best we can, and hope the comments are helpful in moving key ones forward given the restrictions imposed by the consultation form.

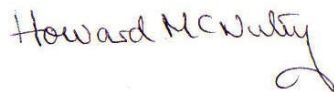
4 The following are the crucial issues for us

- There is no Code of Ethics merely Standards. The RPSGB Code is short memorable and capable of adaption into standards. The status of this needs clarification.
- Whilst a General Code could cover both pharmacists and technicians [and maybe even other professions as well], there must be different levels of standards in some areas to reflect the legal responsibilities of pharmacists and the different levels of knowledge competencies and skills of technicians.
- Many of the Standards are too specific for pharmacists and are largely written for those in clinical practice. Those who work outside as many of our members do, will find these difficult to relate to
- Guidance for Owners and Superintendants could be widened beyond retail pharmacy by adding a section for pharmacy managers (both technicians and pharmacists) including those working outside the retail pharmacy sector.
- We need to reduce the size of the rulebook. A bureaucratic strait jacket will harm rather than help the patient.

We would be happy to help in any way possible and hope you don't mind this direct approach. We attach our specific comments in the attached form.

Many thanks

Yours sincerely



Howard McNulty (Prof)

General Secretary