



**Report on the responses to the consultation on fees
2016/17**

March 2016

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1. About the Pharmaceutical Society of Northern Ireland

- 1.1 The Pharmaceutical Society of Northern Ireland is the regulatory body for pharmacists in Northern Ireland.
- 1.2 Our primary purpose is to ensure that practising pharmacists in Northern Ireland are fit to practise, keep their skills and knowledge up to date and deliver high quality safe care to patients.
- 1.3 It is the organisation's responsibility to protect and maintain public safety in pharmacy by:
 - setting and promoting standards for pharmacists' admission to the register and for remaining on the register;
 - maintaining a publicly accessible register of pharmacists, and pharmacy premises;
 - handling concerns about the Fitness to Practise of registrants, acting as a complaints portal and taking action to protect the public; and
 - ensuring high standards of education and training for pharmacists in Northern Ireland.

2. About the Consultation

- 2.1 The Pharmaceutical Society NI's primary source of income is derived from the fees charged to registrants and pre-registration students, with further funding coming from the registration of pharmacy premises and a small additional revenue source coming from investments. Responsibility for setting of premises fee levels lies with the DHSSPS under the Medicines Act.
- 2.2 In the course of the 2014/15 review of fees, which was the subject of public consultation, the Department of Health Social Services and Public Safety (DHSSPS) was requested, under Articles 25A of the Pharmacy Northern Ireland (Order) 1976 as amended, to approve amendments to some of the fees levied by the Society. During this approval process it became clear that, in the last round of substantive amendments to fees in 2009, some of the changes requested at that time had for some reason not in fact been incorporated in new Regulations as expected.
- 2.3 The Council initiated an immediate and comprehensive review of fees charged and their historic legislative basis. As a result, it became clear that a number of anomalies had arisen over a period of twenty years such that some registrants and prospective registrants were charged fees for services provided on the basis of a fee structure that was not consistent with Regulations. In particular, this affected the registration of students and those taking pre-registration examinations.
- 2.4 The Council is satisfied that all fees charged were commensurate with services provided in the interest of public safety, development of the profession and upholding

the reputation of the profession. It is also satisfied that there does not appear to be any injustice directly flowing from the higher fees actually levied in most recent years since for example a student will have received a considerable and, at the very least, commensurate benefit at the expense of the Pharmaceutical Society NI.

- 2.5 Fully addressing the historical anomalies in our fee Regulations will require a comprehensive review and amendments to primary legislation. The Pharmaceutical Society NI is currently working with our legal advisors and the DHSSPS to this end. Along with the DHSSPS the Society is committed to introduce as soon as possible, a more transparent, agile and modern approach to fees. Further detail can be found in the letter to registrants sent in September 2015:
<http://www.psni.org.uk/publications/fees-2015/>
- 2.6 As the regulator of pharmacists in Northern Ireland the Society does, however, continue to face a number of financial pressures in relation to fulfilling our statutory duties. In the interim, the Society consulted upon proposed increases to certain fees under the existing regulatory fees structure in order to meet those statutory duties. The consultation was exclusively about the level of Annual Retention and other associated fees we intend to charge after approval of any amendment to the fee Regulations.
- 2.7 A separate consultation will be published in due course in relation to a more comprehensive restructuring of our legislative base for setting fees.

3. Consultation Engagement

- 3.1 **Correspondence with key stakeholders:** All registrants and key stakeholders were emailed details of the consultation with instructions on how to respond.
- 3.2 A letter from the Chief Executive informing registrants of the proposals and information about the consultation process was also sent to all registrants¹.
- 3.4 **Website:** The Consultation Document and all published documents relating to the consultation were available to download from the website along with a response form².

4. Purpose of the Report

- 4.1 This report provides a summary of the responses to the consultation on fees 2016/17, held from 30 November 2015 to 25 January 2016. It further outlines the Council of the Pharmaceutical Society NI's consideration of those responses and its recommendation.

¹ <http://www.psni.org.uk/wp-content/uploads/2012/10/Registrant-fees-letter-30-nov-3-final.pdf>

² <http://www.psni.org.uk/publications/consultations/>

- 4.2 The report provides key statistics, draws out themes and includes a commentary on the responses to each of the consultation questions. The analysis aimed to summarise general themes and issues and highlight areas of agreement, as well as to reflect diversity of opinion. It took account of the full range of views presented in responses.
- 4.3 A breakdown of responses by individuals/organisations which stated they were content to be listed is presented in appendix A.

5. Approach and analysis

- 5.1 Responses to the consultation document were framed by 15 questions with space provided for respondents to make further comments on the fees consultation document and proposal.
- 5.2 The analysis provides basic quantitative presentation of how respondents answered each question.
- 5.3 Qualitative responses were all considered. The analysis identifies and summarises emerging themes. It highlights areas of agreement and diversity of opinion.
- 5.4 The consultation responses raised a diversity of issues relating to fees and the profession of Pharmacy in Northern Ireland.
- 5.5 When considering responses the Pharmaceutical Society NI placed each response in the context of the statutory duties, role and purpose of the Pharmaceutical Society NI.
- 5.6 The Pharmaceutical Society of Northern Ireland works under the legislative framework provided by the Northern Ireland Assembly.
- 5.7 As the regulatory body, we seek to protect the public by:
- setting and promoting standards for pharmacists' admission to the register and for remaining on the register;
 - maintaining a publicly accessible register of pharmacists, and pharmacy premises, in Northern Ireland;
 - handling concerns about the Fitness to Practise of registrants, acting as a complaints portal and taking action to protect the public; and
 - ensuring high standards of education and training for pharmacists in Northern Ireland.
- 5.8 In line with the sentiments of "Trust Assurance and Safety" 2007, the Council of the Pharmaceutical Society NI devolved the leadership functions contained within the legislation, to the Pharmacy Forum.
- 5.9 The Pharmaceutical Society NI has identified issues and themes emerging from the consultation responses which it considers to be outside of its statutory remit.
- 5.10 The report also, where it has been considered appropriate, provides a response from the Pharmaceutical Society NI to identified themes and issues. A summary of the Council's deliberations on the responses are included after each question.

- 5.11 No differential weighting was given to responses, and all responses were read and considered. Comments and points from individuals were considered alongside the views of organisations. Where the views of a particular organisation/individual were considered to be particularly relevant to a question or issue this has been highlighted in this report.
- 5.12 In the report, comments and direct quotes are attributed to the grouped consultee category to which they fit i.e. individual pharmacist. With regards to organisations, we have, unless instructed not to, directly attributed comments/quotes.

6. Respondents

- 6.1 A total of 27 responses to the consultation were received and analysed, comprising 17 responses identified as being from individuals and four responses on behalf of an organisation. Six respondents did not specify if they were responding on behalf of an organisation or as an individual. 26 respondents filled in the questionnaire whilst one respondent replied via email. 21 of the respondents were pharmacists, two were members of the public and three did not stipulate a category. Breakdowns of responses by individuals and organisations are presented in appendix A.
- 6.3 Table One shows the type of organisations we received responses from.

Table One

| Organisation | |
|--|---|
| Health and Social Care organisation | 0 |
| Government department | 0 |
| Pharmacy Business | 1 |
| Professional body | 0 |
| Representative body | 3 |
| Pharmacy organisation | 0 |
| Oversight body | 0 |
| Total organisations | 4 |

7. The Pharmaceutical Society NI's approach to considering the consultation

- 7.1 As stated above (paras 5.5 -5.9), when considering responses the Pharmaceutical Society NI placed each response in the context of the statutory duties, role and purpose of the Pharmaceutical Society NI.
- 7.2 The Pharmaceutical Society NI considers that responses which dealt with substantive issues regarding differentials in pharmacists' pay, or the number of undergraduate pharmacists to be beyond the remit of the regulator.
- 7.3 Similarly responses which directly addressed the existence and legislative status of the Pharmaceutical Society NI are not within the direct remit of the Regulator, as changes to this status reside with the Department for Health Social Services and Public Safety and the Northern Ireland Assembly.

- 7.4 The Pharmaceutical Society NI considered responses which dealt with the ability of registrants to pay were potentially relevant, but only with relation to the ability of the profession to maintain the Regulator and its legislative functions, not on the rights and wrongs of pay-scales within the profession.
- 7.5 Responses which dealt with the professional representation of pharmacists were considered with regards to whether the issues highlighted directly related to the funding allocated to the Pharmacy Forum.
- 7.6 Responses which focused on the business model, structures, information provided by and business practices of the Pharmaceutical Society NI and how they related to the proposed increase in fees, were considered the most relevant to the scope of the consultation.
- 7.7 In its considerations, the Council of the Pharmaceutical Society NI (The Council) received, a draft copy of this consultation report, a list of respondees and a table setting out all responses to the consultation. Copies of all original responses were also available to Council members.
- 7.8 In addition, the Council discussed and agreed to take into consideration the following principles around the setting and collection of fees in healthcare regulatory bodies, when developing its response to the Consultation:

Figure 1

Principles

1. It is an accepted principle that the costs of regulation in healthcare are borne by those regulated.
2. The profession has argued for and supported local regulation and this position has been supported by the NI Assembly.
3. The current fees consultation and responses need to be considered in the context of the current regulator's arrangements, as set out in legislation.
4. Council recognises that there is a planned review of pharmacy regulation in NI – any changes arising therefrom are unlikely to come into effect in less than 2 years given the need for legislative reform to make changes.
5. The recent discovery of irregularities in the current fee regulations needs to be addressed – if changes are not made there is potential for a deficit of up to £108k arising in June 2016 because of the requirement to charge only those fees in regulations.

8. Question 1:

Do you agree with the Council's proposal to amend the 1994 General Regulations to the extent identified in this consultation paper and the attached draft amending regulations, pending a more comprehensive review of the overall fee charging structure?³

| | Yes | No | Not sure | Didn't answer |
|------------|-----|-----|----------|---------------|
| Number | 6 | 18 | 1 | 2 |
| Percentage | 24% | 72% | 4% | |

- 8.1 Only one respondent who answered 'yes' to question one provided additional comments; the respondent stated that *"Given that there has not been a review or change of fees in line with inflation since 2009 there needs to be a comprehensive review of fees and expenditure"*.
- 8.2 Of the 18 respondents who answered 'no' to question one, 18 provided further comments.
- 8.3 The one respondent who answered 'unsure', provided a further comment.
- 8.4 Question 4 specifically related to the Council's approach to propose a more limited increase in fees, pending the more comprehensive review of the overall fee charging structure, the majority of comments in relation to question one referred to the specific increase in fees proposed. The analysis of answers to this question has focused on those which specifically addressed the question and those comments which addressed the specific increase in fees have been reflected in analysis to question 4 which deals with fairness and reasonableness of the overall proposals for fee increases.
- 8.5 The Pharmacy Forum questioned the proposal to amend the General Regulations to the extent identified in light of the not yet completed major review of fees structures and the outcome of the wider review of pharmacy regulation in Northern Ireland stating:
- "The Pharmacy Forum NI would question why the PSNI whilst facing a major review of its structures would consult on the raising of fees without;*
- (i) knowing the outcome of the review of regulation and professional leadership role of the Pharmaceutical Society NI*
- (ii) completing and publishing the 'comprehensive review of its fees structure' as outlined in the letter to all registrants and in this consultation*
- The Pharmacy Forum NI understands that there are no timelines to the review but would question how, if the Minister splits the roles of the PSNI, can the Society propose a budget with this uncertainly. The Society has not provided enough information in regards what proportions of the fees are spend on regulation and*

³ N=25 - percentages exclude those respondents who did not specifically answer the question.

leadership. We would also ask the Council to complete the review of fees and then publish all information relevant whilst setting out its case for any proposed increase to fees, this review must also take into account premises fees”.

- 8.6 Boots stated that “*while we recognise the inevitability of short-term increases in fees, we believe that this approach fails to address the long-term issues of fee-setting and financial viability that continue to surround the PSNI and its regulatory functions”.*
- 8.7 An individual pharmacist stated that “*...the recommendation to amend the regulations prior to a comprehensive review appears to obviate the need for a review i.e. why not review and then amend?”*

Figure 2

Council’s response to Question 1

This question related to the decision of Council to propose an amendment to the regulations pending more comprehensive review of the overall fee charging structure. A number of respondents in their commentary did not address this specific issue but rather discussed matters more pertinent to question 4 – these comments have been addressed under that question.

Council reminded themselves of principles 4 and 5 (Figure 1) – whilst there will need to be a further more detailed review, there is an immediate imperative to review fees at this time – Council concluded that it was appropriate to review

9. Question 2:

Do you accept that we have provided adequate information to explain the proposed fees and associated increases or amendments?

| | Yes | No | Not sure | Didn’t answer |
|-------------------|-----|-----|----------|---------------|
| Number | 13 | 13 | 0 | 1 |
| Percentage | 50% | 50% | 0 | |

- 9.1 Of those 13 respondents who answered ‘yes’, six provided an additional comment, stating comprehensive information relating to forecast expenditure for 2016/17 had been provided. For example an individual pharmacist stated: “*Information provided very informative and diagrams provided clearly show proposed fee changes. How proposed fee changes will help with the deficit could be clearly seen with forecast [sic] expenditure and income over the following years”.*
- 9.2 Of those 13 respondents who answered ‘no’ to question 2, 12 provided additional comments.

Alternative options - efficiencies

- 9.3 A number of respondents stated that the document did not provide enough information with regards the business alternatives to increasing fees and the efforts the organisation is making to reduce costs. For example an individual pharmacist stated:

“Information has been provided to explain the increased costs of running the Society, however, no information has been provided to explain the alternatives that have been considered and what would happen if the fees were not increased”.

- 9.4 Another individual pharmacist stated that *“There are no details with regard to other options or areas/possibilities researched with the aim to reduce costs and also reconsider reduced fees”.*

Level of detail

- 9.5 Linked to the issue of alternative options, a number of respondents suggested that some of the information provided did not include the requisite amount of detail to make a fully informed judgement.

- 9.6 For example one respondent stated: *“There appears to be no substantial detail in regards to the finances e.g. pie chart contains no numerical information including a detailed breakdown of salaries (something which is done by almost every other type of organisation be it regulatory (including GMC), business or otherwise).”*

- 9.7 CPNI stated that *“in order to make an informed response to this consultation it was necessary to review and compare the Annual Reports 14/15 (including Statements of Financial Activities) of both Pharmaceutical Society NI and GPhC”.*

Financial projections

- 9.7 A number respondents raised the issue of potential future risks to the proposed business plan which were not included in the information provided, for example one individual pharmacist stated:

“There is no reference to future financial risks e.g. potential obligation of the PSNI to refund any fees charged in excess of regulations, on-going payment of monies to a former employee.”

The lack of complete and unambiguous information regarding on-going expenses and the lack of fairness (e.g. in comparison with other healthcare professions- see response to Q4) means I cannot agree with requirement to increase fees”.

- 9.8 Whilst the CPNI stated:

“In respect of financial projections, one key area remains uncertain, namely the legal costs which will be incurred by the Pharmaceutical Society NI to correct the legislative inconsistencies highlighted. We do not believe it is appropriate for registrants to be expected to pick up the costs associated with this work”.

Figure 3

Council's response to question 2

Respondents were equally split on this – the information contained in the consultation was reviewed. It was noted that much of the information provided was copied from the Annual Report which was laid in the NI Assembly in June 2015.

Council noted that extensive information on the legal basis for current fees in regulations was given on pages 8 – 16 of the consultation document. Page 17-18 went on to set out the fees as they would be had they risen by inflation, and pages 19-21 provided a year by year analysis from 2009 to 2016/2017 of income versus expenditure both in graphical and tabular form. Pages 20-24 went on to identify expenditure by type and in particular identified significant expenditure increases arising out of legislative reform in 2012 around governance and fitness to practice.

In considering further the specific comments Council noted that many of them addressed concerns about the potential for cost savings. Page 18 of the consultation document identifies the existence of savings – Council reviewed the effect of inflation only and noted that the comparative fee if fees had risen in line with inflation between 2009 and 2017 would be £446, some 12% higher than that proposed in the consultation. In the same period the consultation document identified increases in Fitness to Practice (FtP) costs of £47,703 and governance of £44,538. The combined effect of these increases, if not off-set by savings, would have been circa £40 per registrant, or a further 10% increase in fees to £486. It follows that the effect of savings has been the ability to set a fee of £398 rather than £486, a saving of 22%.

The chair of Resources confirmed that the strategy proposed required the introduction of further savings and the fee increases set out in the consultation, having regard to the current financial position, the historical position and the projections for next year

Council acknowledged the desirability of greater emphasis in future being provided in fee consultation documents of savings achieved and efficiency measures considered.

10. Question 3:

Do you agree that we have provided sufficient information on student registration and (pre-registration) examination fees to explain the proposed increases?

| | Yes | No | Not sure | Didn't answer |
|-------------------|-------|-------|----------|---------------|
| Number | 16 | 8 | 2 | 1 |
| Percentage | 61.5% | 30.8% | 7.7% | |

- 10.1 Of the 16 respondents who answered 'yes', eight provided an additional comment; two of those respondents, whilst answering that they were content with the information provided, raised the issue of what contingency plans exist to cover the cost of student registration and (pre-registration) examination fees if the numbers registering fall below the projected 215.
- 10.2 Of the eight respondents who answered 'no', eight provided additional comments. Of the two respondents who answered 'unsure', one provided an additional comment.

The term Student

- 10.3 Amongst those respondents that answered no to question 8, the main issue related to the term 'student'. There was confusion as to whether the term student related to university undergraduates or pre-registration pharmacists. For example an individual pharmacist stated:

"I am unclear as to whether "student" relates to a pre-registration pharmacist or an under-graduate student in university.

I agree with the proposed fees with regard to pre-registration students and the exam fee structure.

If the term "student" refers to an under-graduate student studying pharmacy, I strongly disagree that they should pay fees to be registered with the Society. Under-graduates pay tuition fees and the cost of registration should be included in this if they are required to register".

- 10.4 The Pharmaceutical Society NI acknowledges that there is some misperception in relation to the term Student, however, this is a reflection of the language used in the Pharmacy (Northern Ireland) Order 1976. The term Student in relation to question 3 refers exclusively to those on or seeking to enter the pre-registration register, not undergraduate university students.
- 10.5 The other substantive comment in relation to question 3 was from CPNI, which related to the level of information provided not allowing a comparison with the GPhC and therefore an assessment of the relative value for money of the current student registration regime and the proposed increase. The CPNI stated:

“...the Pharmaceutical Society NI’s student registration and (pre-registration) examination fees are currently around 10% higher than comparable GPhC fees, an increase to the proposed fee levels would increase this differential to closer to 20%. This is a significant cost differential for students and it would be helpful if this information had been disclosed to consultation respondents, with the reasons for this differential explained,

Equally I note that while GPhC do not register students per se, rather they pay a fee to be enrolled into their pre-registration scheme, GPhC has agreed a student code of conduct and student fitness to practise guidelines.

While I appreciate there are likely to be economies of scale in this area it would be helpful if registrants could be assured that these processes are running as efficiently as possible. I also note the consultation document refers to benefits for students of being registered with the Pharmaceutical Society NI, it would be helpful for registrants to understand what these benefits are, aside from eligibility for the pre-registration programme”.

Figure 4

Council’s response to Question 3

Council considered the issue of confusion around terminology of ‘student’. It noted that the report authors had provided more detail at 10.4 in the report. It suggested that future references to students would benefit from a similar explanation.

Council then considered the comments around comparison between the GPhC charges for the programme when compared to the Pharmaceutical Society NI. Council noted that students are registered with the Pharmaceutical Society NI which of itself represents a cost, the processes differ between the programmes although both have a code of conduct, and processes for dealing with non-compliance with the code.

Principle 3 (Figure 1) was then raised, whereby the differing contexts and in addition scales of the programme, would raise the likelihood of different costs.

An annual report is provided to Council on student satisfaction as well as a report by an external examiner on the quality of the programme.

11. Question 4:

Do you regard the overall proposals for fee increases for 2016/2017 to be fair and reasonable?

| | Yes | No | Not sure | Didn't answer |
|------------|-----|-----|----------|---------------|
| Number | 5 | 21 | 0 | 1 |
| Percentage | 19% | 81% | | |

- 11.1 Of the 5 respondents who answered 'yes' to question four, one provided an additional comment, with the individual pharmacist stating:

"The increase in fees for this year is reasonable in line with the fact that there has been no increase since 2009 and expenditure has increased over the years.

Given that the salaries for those working in the managed sector of the DHSSPSNI have not risen in line with inflation for the past few years, so that they are effectively experiencing reduction in pay, it is a relief that the proposed increase in fees this year is not equivalent to what the retention fee would have been if uplifted in line with inflation.

Also, it is entirely not reasonable when considered relative to the fees of £155 for registration of pharmaceutical premises. While that is out with the remit of this consultation, I hope that will be addressed in the proposed fuller consultation later this year"

- 11.2 Of the 21 respondents who answered 'no', 17 provided additional comments.
- 11.3 A number of themes emerged from the comments of those respondents who answered 'no' to question 4. They have been categorised as follows:

- Differentials in registration fees across the UK and between professions;
- The circumstances of the Pharmacy profession; and
- The cost of regulation and professional representation.

Differentials in professional registration fees across the UK and between professions

- 11.4 A number of respondents stated that they considered the overall proposals for fee increases to not be fair or reasonable as the fees charged are disproportionate to the fees paid by pharmacists registering in Great Britain with the GPhC and that they are disproportionate when compared to different professions with similar salaries as pharmacists.
- 11.5 For example an individual pharmacist stated:

"I regard the proposed fee increases for 2016/2017 as both unfair and unreasonable.

I think it is unfair that pharmacists in NI have to pay higher registration and retention fees than their counterparts in GB when all other healthcare professionals are regulated on a UK-wide basis.

I think it is unreasonable to ask pharmacists in NI to pay an annual retention fee of £398, as this is almost 60% higher than the fee paid by pharmacists in GB. The GPhC annual retention fee for pharmacists registered in GB is currently £250, and the registration fee is £356 (£106 application fee + £250 first entry fee). In addition, the GPhC charges a fee of £142 for students to enter onto the pre-reg scheme, and a pre-reg assessment entry fee of £182”.

- 11.5 Another individual pharmacist stated: *“The fees for the PSNI are already excessive, represent poor value for money and are not reflective of comparable fees in other registering bodies. Nurses, physiotherapists and social workers all pay considerably less than £200 per annum.*

Even comparing with the medical body (the General Medical Council) the fees are disproportionate. Junior doctors pay approx. £200 for first registration with retention fees rising commensurate with pay and clinical risk. However GPs/ Medical Consultants pay ~£420 per annum. Does the PSNI suggest that medical consultants are at the same level as newly qualified pharmacists who would be earning approx. one quarter of the comparable annual salary?”

- 11.6 A number of respondents suggested that the fees should only be amended to bring them into line with the fees charged by the GPhC.

The circumstances of the Pharmacy profession

- 11.7 A number of respondents stated that they considered the overall proposals for fee increases to not be fair or reasonable in light of the financial burdens facing many within the pharmacy profession. Issues from recent pressure on pharmacist wages due to fiscal constraints within the health service, the circumstances of part-time workers and the fact that some employers pay pharmacists’ fees and some do not were referenced.

- 11.8 For example the Guild of Healthcare Pharmacists stated: *“More cognisance needs to be taken of the financial situation of individual pharmacists not just of the pharmacy profession when deciding a business model. Consumer inflation levels in the economy do not necessarily reflect the individual financial situation of registrant’s currently affected by factors such as wage deflation, lack of full-time work etc.*

- 11.9 Going on to say:

“The vast majority of our members cite personal financial difficulty with the ever increasing retention fee

“In the last 10 years the number of pharmacists qualifying has increased, wages have decreased but PSNI fees have gone from £170 in 2004 to £372 in 2014. This increase in fees over the last 10 years has led to comparison of other professions registration fees including our pharmacist counterparts in the rest of the UK”.

11.10 An individual pharmacist stated:

“I feel that as many community pharmacists have their fees paid by their employers they are not concerned by fee increases. Many hospital pharmacists now work less than full time hours, and this increases substantially the burden of paying fees from a reduced income, which has not seen any pay rises at all in recent years”.

The cost of regulation and professional representation

11.11 A number of respondents raised concerns that the costs associated with the regulation of Pharmacy in Northern Ireland were disproportionate with the costs of regulation in Great Britain, suggesting that guaranteeing the efficient and effective running of the organisation has an impact on the fairness and reasonableness of the overall fee increase. In addition to this a number of respondents raised questions concerning the value for money of the Professional Forum and the percentage of the fee which is used for professional representation.

11.12 For example CPNI in a covering letter provided a detailed analysis of Pharmaceutical Society NI costs compared to the GPhC. The CPNI stated:

- *“Pharmaceutical Society NI Salaries/NI and Pension costs are over 30% higher per registrant than GPhC.*
- *Pharmaceutical Society NI Governance costs are also over 30% higher per registrant than GPhC”.*

11.13 The CPNI went on to state:

“CPNI as an organisation has always supported Pharmaceutical NI and local regulation and we appreciate there are understandably economies of scale in some of the disparities highlighted. However, we believe it is important for registrant in Northern Ireland to be confident that their local regulator is running as efficiently and effectively as possible and an internal review, with key findings being made available to Registrants, would help provide some level of assurance”.

11.12 Boots referenced analogous concerns on the cost of regulation stating:

“The root cause of the increasing financial deficit faced by the PSNI is the costs of the regulatory changes imposed by the DHSSPS in 2012 without any additional income or support. This can be seen in the near doubling of fitness-to-practise costs since 2009 and a ten-fold increase in governance costs. In our view, these are unsustainable in the long term without additional support from the Department”.

11.13 The Pharmacy Forum Stated:

“The Pharmacy Forum NI believe that the onus is on the PSNI to show that it is value for money, we do not see in this consultation where you have provided evidence of value for money in terms of Governance and Fitness to Practice (FtP)”.

11.13 Referencing the value for money of professional representation for pharmacists in Northern Ireland an individual pharmacist stated:

“Comparing fees with the General Pharmaceutical Council also indicates poor value. The ‘Pharmacy Forum’ does not warrant a difference in fees of £150 between the PSNI and the GPhC. Further the Royal Pharmaceutical Society, with its ‘Pharmacy Faculty’, will likely encourage hospital pharmacists in Northern Ireland to become members thereby replacing any perceived and/or potential benefit of the Forum”.

Payment of fees by instalments and direct debit

11.14 An additional theme which emerged in relation to question 4, was the consideration by a number of respondents that the inability of pharmacists to pay their retention fee in instalments and/or by direct debit as having an impact on the fairness and reasonable nature of the proposed fee increase.

11.15 For example an individual pharmacist stated:

“There has been no consideration given to what help can be provided to Registrants in paying the registration fee. Currently the only way to pay is in one annual lump sum. This can prove difficult for some Registrants. The Society must explain in detail why this cost cannot be split into more manageable instalments for Registrants, perhaps paying in advance for the coming year. I think this would be much more reasonable than the current set-up”.

Figure 5

Council’s Response to Question 4

Council considered the three themes as set out in 11.3 of the report:

1. Differentials in registration fees across the UK and between professions

Council discussed the fact that every regulator operates under a different legislative regime which sets out both what they do and how they may raise fees. In the case of Pharmaceutical Society NI the legislation also puts an additional duty on the organisation to provide leadership and this will naturally come at a cost.

Council considered principle 2 (Figure 1) and noted that the regulation of healthcare professionals is a devolved matter and the NI Assembly has chosen to operate a pharmacy regulator in NI.

When looking at comparisons to GPhC it was noted that one of the respondents had accepted in response to another question that economies of scale will play a part, additionally the Pharmaceutical Society NI is required to deliver within its legislation which includes a leadership role. Council discussed the fact that the fees raised were used only for statutory purposes. Council did not consider it appropriate to consider delivery of regulation and leadership in NI within a fee structure designed to deliver only regulation, under different legislation, in Great Britain.

2. The circumstances of the pharmacy profession

Council discussed the fact that registration gives access to the Register and provides an entitlement to practice as a pharmacist.

Council also noted that despite additional responsibilities and costs added in 2012, fees since 2009 were substantially below that which inflation alone would have added, the difference arising from savings and efficiencies. Council confirmed that it intended to continue the process of cost reduction and were working with the Department of Health Social Services and Public Safety to attain legislative reform that would assist in that endeavour.

3. The cost of regulation and professional representation

Principle three requires the fees set to reflect the legislative requirements in NI, which differ from other healthcare regulators. The Pharmaceutical Society NI operates under different legislation and in a different context to GPhC, consequently the cost base will differ.

Council noted that the costs of GPhC registration and membership of the Royal Pharmaceutical Society amounted to £448, some £50 above that proposed herein for the joint function. It was noted that members could stand for election to the board of the Pharmacy Forum and thereby influence its activities, including those around value for money.

Council noted the suggestion of payment by instalments and recognised that the current legislative arrangements would require amendment to permit this. Current arrangements for non-payment of fees are very prescriptive and presume a single payment – Council recommend that this be reviewed in the context of legislative reform.

12. Question 5:

Do you regard it as reasonable and proper for the fees charged for registration and retention to be used to cover the general running costs of the Society and to ensure the performance of its statutory functions?⁴

| | Yes | No | Not sure | Didn't answer |
|-------------------|-----|-----|----------|---------------|
| Number | 10 | 11 | 4 | 2 |
| Percentage | 40% | 44% | 16% | |

⁴ N=25 as one respondents did not fill in any answer.

- 12.1 Of those respondents who answered yes to question 5, two provided additional comments. For example Boots stated: *“This is the obvious position set out by legislation and accepted good practice for regulatory bodies”*.
- 12.2 Of the 11 respondents who answered ‘no’, 11 provided additional comments. A number of respondents raised the issue as to whether a greater proportion of the Fitness to Practise costs should be recouped from those sanctioned under the process.

Fitness to Practise costs

- 12.3 For example an individual pharmacist stated:

“What proportion of the costs associated with fitness to practise cases is recouped from those who have been sanctioned? Further consideration must be given to pursuing costs from those Registrants that have been found unfit to practise. It is unreasonable for these costs to be borne by all Registrants”.

- 12.4 Another respondent stated:

“As legal costs increase substantially I do not feel that it is reasonable to pass this burden onto the law abiding members”.

- 12.5 The remainder of the comments reiterated arguments against the increase in fees, largely in line with the themes identified in the responses to question 4.

- 12.6 Of those respondents who answered ‘unsure’ four provided additional comments; two themes emerged in these comments, firstly a reiteration of whether a greater proportion of Fitness to Practise costs should be recouped from those sanctioned under the process, especially in light of the potential for further increases in Fitness to Practise cases.

- 12.7 For example the Guild of Healthcare Pharmacists NI stated:

“RPS have said that they feel that new duty of candour requirements could lead to increased numbers of patients seeking legal redress which may in turn increase the number of fitness to practice cases that will arise. This again could increase PSNI costs. It needs to be more clear what plans have been made to allow for continued increasing costs of new governance structures and fitness to practice regulation. Detail is required on alternative funding mechanisms to reduce the upward pressure on individual registrant retention fees.

Could PSNI look at more cost effective ways of disposing of Fitness to Practice (FtP) cases?

More debate within PSNI and consultation with registrants is urgently needed around;

•Consensual disposal

•Recovery of costs from FtP cases where registrants is sanctioned by statutory committee

•Auto-barring / Auto-erasur”

- 12.8 Another issue raised was the costs associated with the dual role of the Pharmaceutical Society NI in relation to regulation and professional representation.

For example one individual pharmacist stated:

“The only way in which we can have a clear picture is to have absolute separation of the regulatory and professional functions as in GB such that fees contribute to either organisation can be used to cover the costs of the function of the organisation.

What we have at the moment is a dual function under the same umbrella and in that context regulation will always dominate professional development and the evidence of that is, unfortunately, quite clear”.

Figure 6

Council’s response to Question 5

Council noted the comments in relation to recovery of fees in FtP cases. It was noted that it is not common practice to routinely seek recovery of fees and any such decision would be subject to a decision of the independent Statutory Committee. Council noted that a new policy on the circumstances in which it would seek to recover costs was due to be considered at Council in February 2016.

Council also discussed recent reductions in legal costs, brought about by an agreement to cap fees for external lawyers and by reallocating salary budget to provide in-house legal expertise, reducing further the expenses associated with legal advice.

Council noted that it is seeking legislative reform to introduce more cost effective methods of case disposal and are committed to delivery of these.

Principle 1 (Figure 1) was also considered to be relevant whereby the cost of regulation is borne by those regulated.

Council considered that the other responses related more to question 4 and had been considered therein.

13. Question 6:

Do you regard it as reasonable and fair that the retention fee and the registration fee are the same on the basis put forward by the Council that the general costs of the Society should be borne by all fully qualified registrants equally?⁵

| | Yes | No | Not sure | Didn't answer |
|------------|-----|-----|----------|---------------|
| Number | 18 | 6 | 0 | 3 |
| Percentage | 75% | 25% | 0 | |

13.1 Of the 18 respondents who answered 'yes' to question 6, eight provided additional comments supporting the proposal that the general costs of the Society should be borne by all fully qualified registrants equally.

13.2 For example Boots stated in its response:

"This reflects the currently accepted view that all registrants are equal insofar that being on the register allows them the privileges of practising as a pharmacist. As such, they are equally responsible for the costs of the Society, regardless of their age, sector of practice, length of registration and whether they work full-time, part-time or only occasionally in Northern Ireland".

13.3 Of the six respondents who answered no, six provided additional comments, most of these comments reiterated issues raised in answer to question 4, however, CPNI stated:

"This is wholly dependent on the fee level. If fees were set at a reasonable level such as the £250 retention fee of GPhC, then in that case CPNI could support the principle of one fee structure for fully qualified registrants, however given the current fee differential between regulators with further increases anticipated from the Pharmaceutical Society it would seem appropriate and fair to retain the legislative facility to accommodate lower fee bands".

⁵ N=24

Figure 7

Council's response to question 6

Council noted significant support for this.

Of the concerns raised Council discussed the issue of “retention of the ability to have” band differentials within the regulations. It was noted that the introduction, in the future, of fee bands is as simple as amendment to an existing regulation.

Council considered that principles two and three were also relevant to comments around comparison to other regulators.

14. Question 7:

Do you regard it as reasonable and fair that there should be no distinction made, on the basis of age, to the fee charged to registrants for retention on the Register?

| | Yes | No | Not sure | Didn't answer |
|-------------------|-----|----|----------|---------------|
| Number | 24 | 1 | 1 | 1 |
| Percentage | 92% | 4% | 4% | |

- 14.1 Of the 24 respondents who answered ‘yes’ to question 7, ten provided additional comments generally supporting the proposal that it is reasonable and fair that there should be no distinction made, on the basis of age, to the fee charged to registrants for retention on the Register. For example an individual pharmacist stated:

“Anybody who is registered with the Society is legally allowed to practise as a pharmacist in Northern Ireland. Therefore, I regard it as reasonable and fair that all registrants are charged the same annual retention fee”.

- 14.2 Those respondents who answered ‘no’ and ‘unsure’ provided additional comments. The respondent who answered ‘unsure’ queried whether the suggestion in the consultation document that there were age discrimination issues in relation to the different categories for over 65 and 70 to be correct.

- 14.3 The individual pharmacist stated:

“I noticed the words around this point - the distinction was regarded as potentially discriminatory on the basis of age. Clearly, it would appear that there is no definitive ruling on this point and I suspect that a clear legal clarification would be required before proceeding one way or the other.”

I note that in other organisations and in commercial settings there are reduced fees for those over 65, for example transport in NI, so clearly is not discriminatory to have a reduced fee structure.

So the argument should not, I think, be based around a discriminatory point but rather the presence of someone on the register commits them to the full rigour of the registration/retention process and with that comes an attendant fee”.

- 14.4 CPNI reiterated its consideration that the issue of removing bands is dependent on the fee level and that under the current proposals, it “*would seem appropriate and fair to accommodate lower fee bands, for pharmacists over 65 or 70 wishing to remain on the register, consequently CPNI believes the legislative facility for this should be retained*”

Figure 8

Council’s response to question 7

Council noted that there was almost unanimous support for this.

Council also noted the comment around the need for those registered to be subject to the full rigour of the registration and retention processes, bringing with it the attendant fee.

15. Question 8:

Do you regard it as reasonable and fair that there should be no distinction made, on the basis of location to the fee charged to registrants for retention on the Register?

| | Yes | No | Not sure | Didn’t answer |
|-------------------|------------|-----------|-----------------|----------------------|
| Number | 23 | 1 | 2 | 1 |
| Percentage | 88% | 4% | 8% | |

- 15.1 Of the 23 respondents that answered ‘yes’ to question 8, nine provided additional comments outlining their general support for the proposal that there should be no distinction made, on the basis of location to the fee charged to registrants for retention on the Register.

- 15.2 For example one individual pharmacist stated:

“Anybody who is registered with the Society is legally allowed to practise as a pharmacist in Northern Ireland. Therefore, I regard it as reasonable and fair that all registrants are charged the same annual retention fee”.

- 15.3 The one respondent who answered ‘no’ to question 8, did not provide an additional comment. Of the two respondents who answered ‘unsure’ one provided an additional comment outlining the contention that: *“If someone is not resident in the country, but hopes to return to work at a later date, and so keep their name on the register, there should be a reduction of fees as there will be no requirement for them to submit CPD, resulting in a reduced cost to the society”*.

Figure 9

Council’s response to question 8

Again Council noted significant support for this – turning to the comment around reduced costs through CPD exemption Council was reminded that all registrants are under the same obligations, irrespective of their place of residence and all are entitled to practice in NI subject to compliance with the obligations.

16. Question 9:

Do you regard it as reasonable and fair that the same fee structure should apply to all registrants seeking to be retained on the Register?⁶

| | Yes | No | Not sure | Didn’t answer |
|-------------------|-----|-----|----------|---------------|
| Number | 20 | 3 | 1 | 3 |
| Percentage | 83% | 13% | 4% | |

- 16.1 Of the 20 respondents who answered ‘yes’ to question 9, seven provided additional comments outlining their general support for the proposal that it is reasonable and fair that the same fee structure should apply to all registrants seeking to be retained on the Register.
- 16.2 For example an individual pharmacist stated:
- “Anybody who is registered with the Society is legally allowed to practise as a pharmacist in Northern Ireland. Therefore, I regard it as reasonable and fair that all registrants are charged the same annual retention fee”*.
- 16.3 Of those respondents who answered ‘no’ to question 9, two provided an additional comment. One comment related to Students, which is not relevant to the Register of Pharmacists and the other comment stated that the removal of bands depended on a reasonable level of fee being set.
- 16.4 The one respondent who answered that they were ‘unsure’ did not provide an additional comment.

⁶ N=24

Figure 10

Council's response to question 9

Again significant support was noted – the comments which were not supportive again referenced the comparison with GPhC or related to students, who are not included in the group considered in this question.

17. Question 10:

Do you agree that the Council should amend the Pharmaceutical Society of Northern Ireland (General) Regulations (Northern Ireland) 1994 to revoke Regulation 4(2)(a) to remove the non-resident retention fee category?⁷

| | Yes | No | Not sure | Didn't answer |
|-------------------|-----|-----|----------|---------------|
| Number | 21 | 3 | 1 | 2 |
| Percentage | 84% | 12% | 4% | |

17.1 Of the 21 respondents to question 10 who answered 'yes' six provided additional comments outlining their general support for the proposal to revoke Regulation 4(2)a to remove the non-resident retention fee category from the Northern Ireland (General) Regulations (Northern Ireland) 1994.

17.2 Of the three respondents who answered 'no' two provided additional comments, one stating the proposal depended on the level of fee being set, whilst the second response outline asked the Regulations to be changed to provide a register for non-practising pharmacists.

17.3 The Pharmacy Forum stated:

"We would ask for this regulation be changed to non-practising pharmacists. There may be occasions in the course of a pharmacist's career when it would be preferable not to be required to meet the mandatory of CPD whilst remaining registered e.g. during a career break, maternity leave, retirement or in a non-practising role.

The Pharmacy Forum NI advocates that consideration be given to creating a non-practising register to create clarity on the grounds of public safety for patients and employers and in addition to offer choices to registrants.

A non-practising register would create opportunity for non-practising pharmacists to remain associated to their profession without the unnecessary burden of trying to identify learning needs and demonstrate improvement or development of practice for CPD cycle completion.

⁷ N=25

Acknowledgement is given to the view that it could initially create a difficulty in perception for the public, in that to date, registration of a pharmacist equates to 'qualified to practise' however other professional Regulators illustrate successful administration and communication of non-practising registers. E.g. the General Medical Council model allows doctors to be registered but not have a licence to practise and similarly the Royal College of Veterinary Surgeons allows a non-practising declaration to be made".

Figure 11

Council's response to question 10

Again significant support was noted – one respondent suggested the creation of a non-practising register – this matter was considered previously by Council and it was decided then that the purpose of registration is to permit practice – it was acknowledged then that such a register could be confusing for the public and employers.

18. Question 11:

Do you agree that the Council should amend the Pharmaceutical Society of Northern Ireland (General) Regulations (Northern Ireland) 1994 to revoke Regulation 4(2)(b) to remove the over 65s retention fee category?⁸

| | Yes | No | Not sure | Didn't answer |
|-------------------|-----|----|----------|---------------|
| Number | 23 | 1 | 1 | 2 |
| Percentage | 92% | 4% | 4% | |

- 18.1 Of the 23 respondents who answered 'yes' seven provided additional comments which outlined general support for the proposal to revoke Regulation 4(2)(b) to remove the over 65s retention fee category. One respondent who answered 'yes' did ask if there should be a separate category for those pharmacists who are retired and no longer practising, so that they can remain on the register, as a pharmacist who is not on the register cannot be nominated for a fellowship, or attend the AGM.
- 18.2 The respondent who answered 'no' stated again that the removal of bands in relation to fees was dependent on a reasonable retention fee being charged by the Pharmaceutical Society NI and that at present at present the legislative facility should be retained.

⁸ N=25

Figure 12

Council's response to question 11

Again overwhelming support was noted, the only comment not supportive referred again to the retention of the ability in the future to have fee banding, dealt with under question 6.

19. Question 12:

Do you agree that the Council should amend the Pharmaceutical Society of Northern Ireland (General) Regulations (Northern Ireland) 1994 to revoke Regulation 4(2)(c) to remove the 70s retention fee category?⁹

| | Yes | No | Not sure | Didn't answer |
|------------|-----|----|----------|---------------|
| Number | 23 | 1 | 1 | 2 |
| Percentage | 92% | 4% | 4% | |

- 19.1 Of the 23 respondents who answered 'yes' to question 12, seven provided an additional comment outlining their general support for the proposal to revoke Regulation 4(2)(c) to remove the 70s retention fee category. One individual who answered 'yes' repeated the question as to whether a separate category for those pharmacists who are retired and no longer practising, so that they can remain on the register, as a pharmacist who is not on the register cannot be nominated for a fellowship, or attend the AGM.
- 19.2 The CPNI which answered 'no' reiterated the point that the removal of bands in relation to fees was dependent on a reasonable retention fee being charged by the Pharmaceutical Society NI and that at present at present the legislative facility should be retained.
- 19.3 The respondent who answered 'unsure' did not provide an additional comment.

Figure 13

Council's response to Question 12

Again overwhelming support was noted. The issues raised around non-practicing were dealt with under the response to question 10.

⁹ N=25

20. Question 13:

Do you regard it as reasonable and fair that students registering with the Society should pay a reduced registration fee for the reasons set out in this consultation document?

| | Yes | No | Not sure | Didn't answer |
|-------------------|-----|-----|----------|---------------|
| Number | 18 | 7 | 1 | 1 |
| Percentage | 69% | 27% | 4% | |

- 20.1 Of the 18 respondents who answered 'yes' six provided additional comments, outlining general support for the proposal that students registering with the Society should pay a reduced registration fee for the reasons set out in this consultation document.
- 20.2 The CPNI, which answered 'yes' to question 13 did raise the issue of the benefits to students of being placed on a student register, stating:
- “Aside from enrolment in the pre-registration programme, it is unclear what benefits students receive from being registered with Pharmaceutical Society NI and as the Society does not have any regulatory function it would seem right and proper that the registration fee is substantially lower than that of fully qualified pharmacists.*
- CPNI reiterates that the cumulative Northern Ireland student fees are currently over 10% higher than those in GB, this would rise to 20% should the proposed increases be actioned, consequently CPNI does not support this increase”.*
- 20.3 Of the seven respondents who answered 'no' to question 13, seven provided additional comments. Four repeated their query regarding the meaning of the term 'student'.
- 20.4 Two members of the public suggested that the consultation document *“failed to provide a reasonable explanation or evidence as to why students should not be charged full fee or that fee charged actually covers to full cost of administering students”*.
- 20.5 The respondent who answered 'unsure' to question 13 also raised questions as to the benefits associated with student registration.

Figure 14

Council's response to Question 13

The issue of the definition of a 'student' was again raised and was dealt with under the response to question 3. The actual cost of administration of the student / preregistration programme was provided on page 11 of the consultation document. In relation to comparison to the GPhC programme principles 2 and 3 (Figure 1) apply, recognising that the pre-registration programme is run independently of the GPhC and has many differences

21. Question 14:

Do you regard it as reasonable and fair that the pre-registration examination fee should be set at a level broadly commensurate with the cost of holding that examination?

| | Yes | No | Not sure | Didn't answer |
|------------|-----|-----|----------|---------------|
| Number | 19 | 5 | 2 | 1 |
| Percentage | 73% | 19% | 8% | |

- 21.1 Of the 19 respondents who answered 'yes' to question 14, nine provided additional comments generally outlining support for the proposal that the pre-registration examination fee should be set at a level broadly commensurate with the cost of holding that examination. With Boots further stating that "*this should not diminish the Society's responsibility to operate efficiently and to hold the costs of holding the examination down to the most appropriate level*".
- 21.2 Of the five respondents who answered 'no', five provided additional comments. The majority of comments stated that the pre-registration examination fee should be set at the same level as that of the GPhC.
- 21.3 For example an individual pharmacist stated:
- "It seems unfair that N. Ireland pre-regs are disadvantaged by higher examination fees, particularly given that many are paid significantly less than counterparts in other areas of the UK. The PSNI should charge the same fee as the GPhC, currently £182 and consider how to administer the examination within the budget available"*.
- 21.4 The two respondents who answered 'unsure' stated that the consultation document failed to provide a reasonable explanation or evidence to show that the proposed fee to be charged actually covers the full cost of administering student examination.

Figure 15

Council's response to Question 14

Significant support for this proposal was noted. Council discussed the rigour required in the running of the pre-registration programme, in particular the exam, the fact that successful completion gave access to the register of pharmaceutical chemists, the QA processes in place and were satisfied that the current fee, which was based upon cost recovery, was appropriate. Council did note that this element, like all others, would be subject to cost reviews and efficiencies would be introduced provided they did not undermine the quality or integrity of the programme.

22. Question 15:

Do you regard it as reasonable and fair that the repeat pre-registration examination fee should not exceed the fee for the substantive examination and remain consistent with it?

| | Yes | No | Not sure | Didn't answer |
|------------|-----|----|----------|---------------|
| Number | 25 | 1 | 0 | 1 |
| Percentage | 96% | 4% | | |

- 22.1 Of the 25 respondents who answered 'yes' to question 15, 11 provided additional comments. The majority of comments outlined general support for the proposal that it is reasonable and fair that the repeat pre-registration examination fee should not exceed the fee for the substantive examination and remain consistent with it. However, a member of the 'public' who answered 'yes' to question 15 stated that the Society "*Must ensure that repeat examination fee continues to cover all costs incurred in providing the pre-registration examination and that registrants do not have to fund any potential shortfall*".
- 22.2 The one respondent who answered 'no' to question 15 provided an additional comment, the individual pharmacist stated: "*No- fee should reflect costs- the inability of a pre-reg to successfully complete the exam on a first attempt should not be reflected in subsidised repeat exam costs. If a subsidy is needed who would be paying- other pre-regs, registrants*".

Figure 16

Council's response to question 15

Overwhelming support was noted. Council considered that as both examination papers are produced at the same time and re-sits are normally taken alongside late entrants to the programme there was no apparent justification in charging more for re-sits.

23. Timing of Consultation

- 23.1 In its response to question one the Guild of Healthcare Pharmacists NI raised concerns in relation to the timing of the notice and beginning of the consultation over the Christmas and New Year period, stating:

"The timing of the notice and beginning of the consultation over the Christmas and New Year period is of serious concern to GHPNI. We believe that the consultation period has been too short and that the timing of the consultation over a prolonged

holiday period (at the busiest time of year for healthcare staff) will damage the credibility of the consultation and should be reconsidered’.

23.2 No other respondents raised this issue.

Figure 17

Council’s response to timing of consultation

Whilst not a specific question, one respondent questioned the timing of the consultation, both in terms of overall duration and period of consultation.

Council considered the comments and noted that the respondent had made a comprehensive response.

Council noted that the prospect of consultation on fees had first been promoted in a letter to all registrants in September 2015 concerning fees, when launched a letter was sent to every registrant, notice was placed on the website and the pharmacy press carried articles on the consultation.

Recognising the legislative timetable Council was of the view that eight weeks was appropriate.

Figure 18

Recommendation

Council, following careful consideration of the consultation report and all attendant responses to the consultation concludes that nothing in the responses warrants an amendment to the draft regulations.

It subsequently recommends that draft regulations, as set out in the consultation document and attached (Appendix B), be made and forwarded to the DHSSPS for approval.

Appendix A

| Name ¹⁰ | Category |
|----------------------------|-----------------------|
| 1. Laura O'Loan | Individual Pharmacist |
| 2. Kathy Burnett | Individual Pharmacist |
| 3. Dr Fran Lloyd | Individual Pharmacist |
| 4. Ruth Coalter | Individual Pharmacist |
| 5. TM Nelson | Individual Pharmacist |
| 6. Paul Nixon | Individual Pharmacist |
| 7. Cathy Wilkinson | Individual Pharmacist |
| 8. Catherine Collins | Individual Pharmacist |
| 9. Helen Daly | Individual Pharmacist |
| 10. Stephen Toner | Individual Pharmacist |
| 11. Norman Morrow | Individual Pharmacist |
| 12. Catherine Stephenson | Individual Pharmacist |
| 13. Professor Collin Adair | Individual Pharmacist |
| 14. Heather Davison | Individual Pharmacist |
| 15. Judith Taylor | Individual Pharmacist |
| 16. Dr Heather Bell | Individual Pharmacist |
| 17. S Dobbin | Member of public |
| 18. D Nelson | Member of public |

| Organisation Name | Organisation type |
|--|------------------------------|
| 19. Community Pharmacy NI (CPNI) | Pharmacy Representative Body |
| 20. The Pharmacy Forum | Pharmacy Representative Body |
| 21. The Guild of Healthcare Pharmacists NI (GHP(NI)) | Pharmacy Representative Body |
| 22. Boots Plc | Pharmacy Business |

¹⁰ Four individual respondents requested that their name not be listed in the report, one respondent did not stipulate whether their name could be listed and subsequently it has not been.

Appendix B

Regulations

The Pharmaceutical Society of Northern Ireland (General) (Amendment) Regulations (Northern Ireland) 2016

Made - - - -

Coming into operation - 1st June 2016

The Council of the Pharmaceutical Society of Northern Ireland, in exercise of the powers conferred by Article 5 of the Pharmacy (Northern Ireland) Order 1976(a), makes the following Regulations with the approval of the Department of Health, Social Services and Public Safety(b)

Citation, commencement and interpretation

1.—(1) These Regulations may be cited as the Pharmaceutical Society of Northern Ireland (General) (Amendment) Regulations (Northern Ireland) 2016 and shall come into operation on 1st June 2016.

2. In these Regulations “the principal regulations” means the Pharmaceutical Society of Northern Ireland (General) Regulations (Northern Ireland) 1994(c).

Amendment of the principal regulations

3. In regulation 2 of the principal regulations (registration fees) for “£372” there shall be substituted “£398” and for “£145” there shall be substituted “£206”.

4. In regulation 4 of the principal regulations (retention fees) in paragraph (1)(a) for “£372” there shall be substituted “£398”.

5. In Schedule 2 to the principal regulations (Conditions applicable to Registration Examination):-
(a) in paragraph 3 (a) for “£75.00” there shall be substituted “£174”;
(b) in paragraph 5 for “£40.00” there shall be substituted “£174” .

Revocation

6. Regulation 4(2) of the principal regulations shall be revoked.

(a) S.I.1976/1213 (N.I.22) as amended by 1981 c.55, S.I.2004/429 (N.I.2), S.R.2004 No.78, S.R.2008 No. 192, S.R. 2012 No. 1916,, S.I. 2012/308, S.I. 2013/258 and S.R.2013 No 3036.

(b) S.I.1999/283 (N.I.1), Article 3(6)

(c) S.R.1994 No.202,as amended by S.R.1996 No.187, S.R.1999 No 217, S.R.2002 No.206, S.R.2003 No.356, S.R.2005 No.63, S.R.2006 No.207, S.R.2007 No.287 and S.R.2008 No 222 and S.R. 2009 No. 166.

Sealed with the Common Seal of the Pharmaceutical Society of Northern Ireland on of
2016
(L.S.)

Jim Livingstone
President

Brendan Kerr
Registrar

The Department of Health, Social Services and Public Safety hereby approves the foregoing

Regulations.

Sealed with the Official Seal of the Department of Health, Social Services and Public Safety on of
2016.

(L.S.)

A Senior officer of the Department of Health, Social Services and Public Safety

Explanatory Note

(This note is not part of the Regulations)

These Regulations amend the Pharmaceutical Society of Northern Ireland (General) Regulations (Northern Ireland) 1994 (S.R. 1994 No. 202) by

1. increasing the fees payable in respect of
 - a. registration as a pharmaceutical chemist and as a student (regulation 2)
 - b. retention as a member of the Society (regulation 4)
 - c. registration examination and re-examination for students (schedule 2)
2. revoking regulation 4(2) of the principal regulations to remove distinct categories of retention fee for non-residents, over 65s and over 70s.