

## Welcome to update



Welcome to the second edition of our regulatory update in 2015. In this edition we take a look at raising concerns, in particular the influence an organisation's culture and policies can have on an individual's decision about whether or not to raise a concern about practices which may be negatively impacting upon public safety.

We also provide you with updates, reminders and tips on Continuing Professional Development, pre-registration and making the most of the new online retention system.

This edition also looks at the most recent learnings emerging out of Fitness to Practise hearings and where we are with the comprehensive review of the Code of Ethics.

Finally we introduce you to a new member of our staff team.

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### Review previous editions

You can read previous editions of our Regulatory Update [here](#)

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# Pre-registration update

The majority of 2015-16 pre-registration trainees have now started training and attended an induction event. To ensure trainees maximise the learning potential of the training year and are fully prepared to join the professional Register, we strongly recommend that e-portfolios are consistently updated; the required four hours of protected development time are completed; and if trainees are not receiving our emails they please contact us.

## E-portfolios

We review all trainee e-portfolios throughout the year and trainees are reminded that up to a maximum of five Performance Standards per cycle of learning will be reviewed. Trainees that have attached an excessive number of Standards to their cycles of learning will have these cycles reverted to "incomplete" and will be contacted by us in relation to addressing the issue.

We strongly recommend that trainees work on their e-portfolio consistently throughout their year to maximise their learning experience. Trainees should refer to their e-portfolio guide and induction material for reference guidance.

## Protected development time

The Standards for pre-registration training state that:

*"A tutor must ensure that the pre-registration trainee will have onsite Personal Protected Professional Development time, agreed through discussion between trainee and his tutor. Training needs should be reviewed regularly. A minimum of the equivalent of **four hours** per working week must be dedicated to Personal Protected Professional Development Time."*

As part of the annual review of pre-registration training trainees are asked if they have received four hours per week protected time for study and development.

Approximately only 50% of pre-registration trainees stated that they 'strongly agreed' or 'agreed' that they received these 4 hours throughout their training year.

***Tutors are reminded that protected development time is a mandatory part of the pre-registration year and it is expected that all trainees will receive this during their training.***

## Emails

All trainees have been emailed in relation to important pre-registration information. If any trainees have not received our emails please check that they have not been delivered to your junk folder. If any trainee has not received emails from us please contact us immediately. All emails sent throughout the training year are available via the trainee correspondence section of our website via the following link:

<http://www.psni.org.uk/pre-registration/pre-registration-correspondence/>



## The pre-registration lead

### Pre-registration lead

The pre-registration lead is Peter McKee. He is a pharmacist based in Pharmaceutical Society NI premises and can be contacted by email to [peter.mckee@psni.org.uk](mailto:peter.mckee@psni.org.uk). He is responsible for all aspects of the pre-registration programme

### Pre-registration contact details

For general enquiries about pre-registration training contact:

The Pharmaceutical Society NI  
73 University Street  
Belfast  
BT7 1HL  
Telephone No: 028 9032 6927  
Fax No: 028 9043 9919  
Email: [pre-registration@psni.org.uk](mailto:pre-registration@psni.org.uk)

Further trainee information can be found on our website [here](#)

## Raising Concerns in the workplace; protecting the public.

All pharmacists registered with us have a professional and ethical duty to raise concerns in the work place when the actions of others put the safety of patients or the public at risk. This is a position underlined by a Joint statement from the Chief Executives of statutory regulators of healthcare professionals on the [duty of candour](#).



Sir Robert Francis, QC, in his recent report *Freedom to speak up*, discovered, however, that many people who had raised concerns within the NHS “described a harrowing and isolating process with reprisals including counter allegations, disciplinary action and victimisation”, with “bullying and oppressive behaviour” being “mentioned frequently, both as a subject of concern and as a consequence of speaking up”.

Outside of the NHS these experiences are supported by the whistleblowing charity *Public Concern at work*, which has found that on occasions when concerns are raised nothing is done or when a response is made it is often in the form of a formal reprisal against the whistle blower.

These reflections make it understandably difficult for individual pharmacists to come forward when they believe the actions of others are placing patients and/or the public in danger.

### Culture and policies

As the Regulator of Pharmacists in Northern Ireland we consider it vital to promote a culture of openness, learning and professional and institutional humility to ensure that individuals come forward when they have genuine concerns about public and patient safety.

Managers and employers are leaders in the pharmacy profession and the culture they instil in an organisation or company matters.

As the regulator of pharmacists we would expect managers and employers to encourage and support a culture in which staff can speak openly and freely about their concerns; can be reassured that genuine concerns raised will be treated with appropriate confidence and sensitivity and they will be treated courteously and sympathetically throughout the process.

***It is vital to promote a culture of openness, learning and professional and institutional humility to ensure that individuals come forward when they have genuine concerns about public and patient safety***

Managers and employers must ensure that there are policies and procedures to manage concerns that are raised, which are accessible to all staff and that all concerns raised are properly investigated, with all staff - including temporary staff and locums - being kept informed of progress. Equally managers and employers must ensure that systems are in place to support pharmacy professionals who are the subject of a concern.

All individual pharmacists should make themselves aware of the raising concerns policies of the organisation they work for.

### Guidance on Raising Concerns

All pharmacists should make themselves aware of the Pharmaceutical Society NI's [Guidance on Raising Concerns](#).

All individual pharmacists and employers should also make themselves aware of how to [raise a concern](#) with us, the regulator of the Pharmacists in Northern Ireland and the other systems and professional healthcare regulators.

# Continuing Professional Development update

**98.8% of registrants completed their CPD requirements for 2014-15. The high number of portfolio submissions again demonstrates the commitment of pharmacy professionals to maintaining their skills and developing their practice.**



## Non-compliance

Out of 2236 registrants eligible to submit a CPD portfolio by the 31 May deadline, 2210 registrants engaged with the CPD process. 26 did not and were subsequently removed from the Register for CPD non-compliance in August 2015, following an extensive investigation process.

## Assessment

221 registrants had their portfolio sampled as part of our audit process. 194 registrants (88%) met standard after first assessment. Online feedback was provided for all portfolios. 27 registrants did not meet standard for first assessment and have now been entered into a process of first reassessment - due to complete, 30 October 2015. The reassessment process offers registrants an opportunity to remediate so that future CPD submissions will be successful and meet the required standard for assessment.

## Top tips for CPD recording

After the first assessment period, we looked specifically at the CPD portfolios which did not meet standard. From our analysis of the data, it is clear that the same recording issues regularly reoccur. For future CPD submissions we recommend that registrants consider the following:

- Attention to detail is important – you must clearly map each of your learning needs through each stage of the cycle.
- In the 'Action' stage, simply describing the contents of the course is not sufficient. Best practice requires that you provide a brief summary (with examples) of personal learning clearly related to each of your learning needs. This means, if you've outlined three learning needs in the reflection stage you should provide three statements of learning regarding each of these learning needs in your summary of learning.

- In the 'Reflection' stage, identify one or more specific learning needs – keep these precise and focussed. It makes filling in subsequent stages of your CPD cycle much easier.
- In the 'Planning' stage and in the 'Activity table', it is best practice to fully reference the activity. Remember that within the activity table you are required to provide sufficient information relating to the learning activity that would allow another individual to source the learning. Complete all fields in the table.
- In the 'Evaluation' stage, you need to provide a clear indication of a change in practice or implementation of learning. There must be a clear link between the original learning need(s) and the actual learning that has been recorded.
- When the assessors consider Criteria 9 - they look at all stages of the cycle and check that each stage clearly relates and maps to the identified learning need(s) specified in the 'Reflection' stage of the cycle. If no specific learning needs are specified it is not possible to determine from the cycle if your original learning needs were addressed.
- Over the course of the year you should aim to apply the learning for at least some of your cycles otherwise it brings limited benefit to you, your patients or your area of practice.

<b>Total number of registrants eligible to submit CPD portfolios</b>	<b>2236 (100%)</b>
<b>Total number of registrants administratively removed for CPD non-submission</b>	<b>26 (1.2%)</b>
<b>Number of registrant CPD reviews undertaken</b>	<b>221 (9.9%)</b>
<b>Number of registrants meeting requirements at first attempt (first assessment)</b>	<b>194 (87.7%)</b>
<b>Number of registrants entered into remediation*</b> <b>*note: the remediation process is set to complete in Jan 2016.</b>	<b>27 (12.2%)</b>

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# Fitness to Practise update

The purpose of our Fitness to Practise (FtP) process is to help protect the public and maintain public trust in the pharmacy profession.



A registrant's FtP is a measurement of whether they are suitable to be on the Register and practise pharmacy in Northern Ireland.

The main means by which a registrant's FtP could be impaired include:

- Failure to maintain required standards of professional proficiency;
- Poor physical or mental health, which impairs an individual's ability to practise safely; and
- Failure to meet the principles of good practice and conduct outlined in our Code of Ethics and subsequent Standards and Guidance documents.

To date in 2015 the Statutory Committee has instructed the removal of three registrants from the Register as an outcome of Fitness to Practise hearings. One registrant being removed and another two being suspended during the 28 day appeal period, which will cease on 1 October 2015, and 16 October 2015 respectively.

## Fitness to Practise Learnings published

In the case of the removed registrant, the Statutory Committee inquired into the retail supply of a Prescription Only Medicine by a pharmacist to a vulnerable individual over a period of five years, without a prescription and in addition to her prescribed sleep therapy, without the consequential updating of the individual's patient records - actions which are in contravention of a number of pieces of legislation.

The Chair of the Statutory Committee provided the following learnings following the conclusion of the case:

- A pharmacist has a duty of care to clinically and legally check the authority for all medicines dispensed, and this includes medicines dispensed under a private prescription.
- Every pharmacy should have a procedure for monitoring and cross checking the ordering, receipt, dispensing and recording of medicines dispensed under a private prescription, and, in particular, medicines that may be 'blacklisted' by the NHS.

- Pharmacies should have in place enhanced procedures for medicines which are controlled under the Misuse of Drugs Act 1971 (or similar legislation) to ensure the proper processing of prescriptions in the interests of patient safety.
- Medicines requiring entries in pharmacy registers should be carefully considered and a contemporaneous record should be made in every case.
- If a pharmacy is asked to dispense a private prescription the request should be checked with the patient's GP (unless the GP is the prescriber) or in any case if there is any doubt about the clinical appropriateness of the supply.
- Where necessary existing pharmacy procedures (SOPs) should be amended to ensure that these points of learning are adequately recorded.

You can find out more information about our Fitness to Practise processes here: <http://www.psni.org.uk/about/fitness-to-practise/>

You can find out more about Statutory Committee determinations here: <http://www.psni.org.uk/about/fitness-to-practise/determinations-of-statutory-committee/>

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## Code of Ethics review - where we are

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Five years after its publication in 2009, we commenced a review of the Code of Ethics for all pharmacists practising in Northern Ireland. The objective of the review was to ensure that the Code remained fit for purpose and relevant to modern pharmacy practice and reflected external developments in the wider context of health care. To date we have made significant progress and plan to publish a revised Code later this year.

### Why it matters

The [Code of Ethics](#) sets the standard of professional conduct for all pharmacists and is regarded as governing the conduct of all pharmacists both within and outside the practice of pharmacy so it is vital we get it right.

### Review process

A Task Group, involving lay and registrant members of the Council of the Pharmaceutical Society NI, worked closely with staff to review the existing Code of Ethics and draft a new Code.

### Engagement with registrants and the public

To help us review the current document and develop proposals, we engaged extensively with stakeholders early in the process, through a series of focus groups and meetings.

Upon completion of a new draft Code we held a full public consultation from February to May 2015.

Responses to the public consultation have been analysed and a consultation report produced.

### Next steps

Based on the feedback from the public consultation, an updated Code is being prepared for final approval by Council before publication later this year.

The new Code will set the standard of professional conduct, ethics and professional performance for every pharmacist both within and outside the practice of pharmacy.

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## New member of staff

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On 1<sup>st</sup> September 2015 Katie Quinn joined the Pharmaceutical Society NI as a Legal Officer. Katie's role will involve conducting Fitness to Practice investigations and preparing documentation for consideration by the Registrar and the Society's conduct committees. She will also review and advise on legislative change which impacts upon pharmacy regulation.

A graduate of Trinity College Dublin and Edinburgh University, Katie has over 20 years experience of working in differing legal environments. She was a Lecturer in Law in Queen's University Belfast and a Senior Lawyer at the Northern Ireland Law Commission. Most recently she has practised as a barrister at the Northern Ireland bar.

## Online retention – faster, simpler and more convenient.

In 2015 we introduced the option for pharmacists to renew their registration online. In what was a successful and smooth process, some 40% of you, (800plus), chose to use the online system. We hope to increase this number next year and we strongly encourage all registrants to avail of this opportunity to reduce your paper work and administrative burden.

### Important to note

- The online registration process is only complete when we receive your fee payment in full. If you process your fee payment online you will receive an email receipt exclusively acknowledging this payment. Only at this point will you be registered. If you have any issues with the online payment system, please contact us immediately.
- To reduce any potential complications and to provide an opportunity to address any issues, we encourage you to process online retention in a timely manner. Payment is due on 1 June each year and the system will be opened on 18 May 2016.

Further information about annual retention can be found here: <http://www.psni.org.uk/registration/annual-retention/>

### Annual Survey of Registrants

**Initial** findings from our Annual Survey of Registrants show that:

- Over **98%** of respondents who renewed their registration online found the process **easy to understand and use**.
- Over **80%** of those respondents who renewed their registration online found the process **more convenient** than the paper based process.

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### Contact us:

Please get in touch with any feedback you may have or issues you would like us to cover in the newsletter.

We would like to hear your views, please email :[Peter.hutchinson@psni.org.uk](mailto:Peter.hutchinson@psni.org.uk)

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