

**Response to the Department of Health and Social Care consultation on the proposal for the use of patient group directions by pharmacy technicians.**

The Pharmaceutical Society NI is the Regulatory body for pharmacists and registered pharmacies in Northern Ireland. Our role, powers and responsibilities are set out in The Pharmacy (Northern Ireland) Order 1976 and related Regulations. Our primary objectives are to:

- protect the public;
- maintain public confidence in the pharmacy profession; and
- uphold professional standards.

Our main work includes:

- Setting standards for the education and training of pharmacists and accredit their qualifications and training.
- Setting standards for Continuing Professional Development (CPD) making sure that pharmacists keep their skills and knowledge up to date.
- Maintain a publicly accessible Register of pharmacists, Foundation Training Year Trainees and pharmacies in Northern Ireland.
- Set and monitor compliance with professional standards:
- Setting the Standards for registered pharmacies, requiring them to provide for the safe and effective practice of pharmacy. We work with the Pharmacy Inspectorate to check pharmacies are meeting the Standards.
- We investigate concerns that a pharmacist or pharmacy premises is not meeting our Standards and act when necessary to protect patients and the public.

## Response

We welcome this opportunity to respond to the consultation on proposals for the use of patient group directions (PGDs) by pharmacy technicians.

Pharmacy technicians in NI are not regulated healthcare professionals, unlike their counterparts in Great Britain (GB) so the proposed amendments to the HMRs cannot currently allow pharmacy technicians in Northern Ireland to use PGDs.

On 29 June 2022, the Health Minister Robin Swann announced he has approved work to begin to bring Pharmacy Technicians in Northern Ireland under statutory regulation by the Pharmaceutical Society of Northern Ireland.

A Steering Group has been established to progress this proposal, co-chaired by the Chief Pharmaceutical Officer and this organisation's Chief Executive. Working closely with Departmental Officials and others, the group is working on three key strands - Education, Legislation Regulation & Consultation and Workforce Development with a target completion date in 2024.

Registering Pharmacy Technicians will provide enhanced public safety and is vital in relation to delivering wider service provision reforms planned for pharmacists and pharmacy in Northern Ireland. However, the continued lack of a Northern Ireland Executive may impact upon the legislative aspects required to deliver this work on schedule.

In principle, we support legislation that enables the most effective contribution of registered pharmacy technicians allowing for the most effective use of pharmacists and a wider skill mix in pharmacy teams.

### Question 1

Do you agree or disagree with the proposal to amend the Human Medicines Regulations (2012) to enable pharmacy technicians to supply and administer medicines to patients using PGDs?

- agree
- disagree
- don't know

If you have any additional information to support your answer, please provide details (maximum 150 words).

### Comment

As the Pharmacy regulator in Northern Ireland, patient safety is our highest priority. The addition of pharmacy technicians with appropriate training and governance arrangements to supply and/or administer medicines to a pre-defined group of people under a PGD would be of benefit to the capacity of the health service to deliver care.

However, it is important to strike the right balance between optimizing the capacity and capability of Pharmacy Technicians to undertake this role and ensuring patient safety.

#### Question 2

Do you agree or disagree that the 2-year pre-registration training equips pharmacy technicians with the appropriate knowledge and skills to complete the training requirements which allow them to use PGDs?

- agree
- disagree
- don't know

If you have any additional information to support your answer, please provide details (maximum 150 words).

#### Comment

We have no specific comment at this time. Education and training requirements for Registered Pharmacy Technicians is being considered by the Pharmacy Technician Steering group.

#### Question 3

Do you agree or disagree that allowing pharmacy technicians to supply and/or administer under a PGD will enable safe access to medicines for patients?

- agree
- disagree
- don't know

If you have any additional information to support your answer, please provide details (maximum 150 words).

#### Comment

Each deployment of pharmacy technicians, like any other health professional, must be subject to an assurance that the provision of appropriate training and supervision / governance arrangements for the specific PGD has been made. All professionals working under a PGD must recognise and work within the limits of their knowledge and skills and refer to others as required.

#### Question 4

This proposal is to allow registered pharmacy technicians to supply and administer medicines using a PGD.

Do you have additional information in support of this proposal? (maximum 150 words)

Do you have additional information for why this proposal should not go ahead? (maximum 150 words)

Comment

We have no specific comment at this time.

Question 5

Do you agree or disagree that the consultation stage impact assessment gives a realistic indication of the likely costs, benefits and risks of the proposal?

- agree
- disagree
- don't know

If you have any additional information to support your answer, please provide details (maximum 150 words).

Comment

As the registration of Pharmacy Technicians will not be realised for at least a year with an embedding period required, we can make no specific comment in respect of Northern Ireland in relation to the proposals beyond the general benefit of increasing capacity in the health service.

**NI respondents: equality and rural screening**

In Northern Ireland new policies must be screened under Section 75 of the [Northern Ireland Act 1998](#), which places a statutory duty on public authorities to mainstream equality in all its functions so that equality of opportunity and good relations are central to policy-making and service delivery. In addition, new or revised policies must be rural-proofed in line with the [Rural Needs Act \(NI\) 2016](#), which requires public authorities to have due regard to rural needs.

Question 6

We do not consider that our proposals risk impacting different people differently with reference to their protected characteristics or where they live in NI.

If you agree or disagree, we welcome views on this point (maximum 150 words).

No comments

### Question 7

Do you agree or disagree that our proposals risk impacting different people differently with reference to their protected characteristics or where they live in NI?

- agree
- disagree
- don't know

If you agree or disagree and have evidence to support your answer, please provide details (maximum 150 words).

No comments

### Question 8

Do you agree or disagree that the proposal risks impacting people differently with reference to their (or could impact adversely on any of the) protected characteristics covered by the public sector equality duty set out in section 149 of the Equality Act 2010 or by section 75 of the Northern Ireland Act 1998?

- agree
- disagree
- don't know

Please explain your answer (maximum 150 words).

No comments