

**General
Pharmaceutical
Council**



**Business plan
2017-20**

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Foreword

Our strategy for 2017-20 sets out our vision for how we can support and improve the delivery of safe, effective care and uphold trust in pharmacy

This document, our first business plan to cover a three-year period, sets out the programmes of work we will prioritise in the next three years to help us to achieve this.

This ambitious plan reflects our ambitious strategy. It outlines our six key programmes of work to help us to achieve our strategic aims, and our ongoing work to deliver our regulatory functions. The business plan also sets out a detailed annual plan for the delivery of work in the 2017/18 financial year.

Both our strategy and business plan have been developed at a time of significant change and uncertainty in pharmacy, in regulation, and in the wider political background in which we work.

External developments, including government policies on pharmacy, reforms to health professional regulation, a proposed second independence referendum in Scotland, and Brexit, could potentially have a significant impact on our work within the next three years and beyond.

The roles of pharmacy and pharmacy professionals in providing care and helping people to maintain and improve their health are also developing quickly in each of the three countries of Great Britain. We recognise that more will be expected of pharmacies and pharmacy teams in the future and that there will continue to be significant pressures on resources across healthcare. We have an important role in helping to make sure that the pharmacy team will have the necessary knowledge, skills and behaviours to respond with confidence to the changes and challenges they will face, and that pharmacy owners are creating and supporting an environment in which pharmacy professionals can demonstrate their professionalism and deliver person-centred care.

Within this context of change and uncertainty we need to ensure that we remain flexible in our approach, while still making sure that we deliver our regulatory functions effectively to protect the public and uphold public confidence in pharmacy. We recognise we may need to adapt our plans in response to these changes, and will identify these changes through our reports to our governing council.

And, as outlined in this plan, we are already preparing to make significant changes to the way we work in order to ensure we keep pace with external developments and are regulating in the most efficient and effective way.

We will continue to monitor our operating costs and improve efficiency in our ways of working, enabling us to keep fees at current levels for the 2017/18 financial year and to



restrict any increases in future years. We will be investing in a major programme to transform how we operate our services, using our available reserves. This programme should deliver cost savings which will help us to restrict fee increases in the future. We will continue to review both fee levels and allocation on an annual basis.

We expect that in three years' time we will be working in a very different way to how we work now. We think the changes we will make will enable us to play a much bigger part in continuously improving the quality of pharmacy and encouraging professionalism and person-centred care. And we will work alongside the people using pharmacy services, people working in pharmacy, pharmacy owners and others, to make sure that everyone can have confidence that they will receive safe and effective care from pharmacy.



Nigel Clarke
Chair



Duncan Rudkin
Chief Executive and Registrar

What we do

People receive safe, effective care and have trust in pharmacy because of the knowledge, attitudes and behaviours of people working in pharmacy

We have an important part to play. We:

- promote professionalism within pharmacy
- assure the quality of pharmacy, including its safety
- support improvement in pharmacy

We have a number of ways in which we do this. These include:

- registering and listing publicly the pharmacy professionals and pharmacies that provide care to persons and the public
- setting and promoting the standards required to enter and remain on our register
- receiving assurances, in a number of ways, that pharmacy professionals and pharmacies continue to uphold our standards – and acting appropriately when they do not

- sharing with others what we learn through our work
- investigating concerns about the people or pharmacies we register and taking proportionate action to protect the public and promote our standards





Business plan 2017-2020

The business plan 2017-20 sets out our key priorities for the next three years to help us achieve our strategic aims set out in our strategic plan 2017-20

The planning overview for the GPhC from 2017-2020 can be summarised through six key programmes of work and a number of areas of focus within the delivery of our regulatory functions.

They are:

- Developing our approach to regulating registered pharmacies to provide assurance and encourage improvement
- Promoting professionalism through the standards for pharmacy professionals and related guidance
- Providing further assurance to the public that pharmacy professionals are meeting the standards

- Setting the standards and quality assuring the initial education and training for pharmacists and pharmacy technicians
- Developing our data and insight strategy
- Transforming our services and the way we work

As part of our day to day work we will continue to improve the way in which we deliver our regulatory functions.

Delivering our strategic aims

Strategic aims



Key programmes of work



Reporting on progress

With a new approach to planning, we are changing the way we report on our performance to our governing council

In line with the council's EDI statement, the work we do to ensure we meet the requirements of our public sector duty and our own EDI agenda is embedded within our planning. Our teams will undertake equality impact assessments and produce action plans to support any areas where there may be opportunities or areas for development in relation to the EDI considerations of our work.

The new 'business report' will include:

- our performance in the delivery of our regulatory functions
- a narrative report on the annual plan to date
- a dashboard overview of the health of the organisation, including finance and resource sections

The first of these reports will be presented to the council in September 2017, reporting on the quarter April-June 2017.

The new reporting regime will also include an annual overview report, the first of which will be delivered in June 2018 as part of the 2017/18 annual report.

Each of the programmes of work, and developments within the delivery of our regulatory functions, may present both risks and opportunities in terms of the delivery of our equality, diversity and inclusion (EDI) agenda.

Three year overview 2017-2020

Developing our approach to regulating registered pharmacies to provide assurance and encourage improvement

We have continued to develop and refine our approach to the regulation of registered pharmacies. Over the next three years we plan to further develop our regulatory approach to improve our ability to provide assurance that pharmacies are delivering safe, effective care.

Our focus remains on being a proportionate regulator, informed by the best available evidence, and we will be considering how to make our inspection arrangements more flexible and responsive as well as making best use of the intelligence we gather from our regulatory functions.

We will also work on sharing this intelligence widely with stakeholders to facilitate learning and improvement across the sector. We will engage with our stakeholders about these changes and implementing them.

To support the ongoing development of our regulatory model, we will work closely with the Department of Health to draft Rules (secondary legislation) to give us a framework for the new powers that will come into effect in the near future (following the commencement of the

Pharmacy (Premises Standards, Information Obligations, etc.) Order 2016). This will include developing our enforcement powers and considering how we will publish the results of our inspections.

We recognise that legislative change can take significantly longer than anticipated, because of availability of resources in government and other factors, and so we will also consider what changes we could potentially introduce in advance of legislative change.

Later during 2017-2020 we are planning to consider how as a regulator we can be assured about the training of the wider pharmacy team, who are not required to register with us.

Promoting professionalism through the standards for pharmacy professionals and related guidance

In 2016 we consulted on and approved our new standards for pharmacy professionals (the standards), the focus of which is promoting person-centred care. We believe that it is the decisions pharmacists and pharmacy technicians make in their day-to-day work which make the most significant and positive contribution to patient safety and the quality of care. These standards come into effect in 2017.



In the time frame of this business plan we will be working with pharmacists and pharmacy technicians to embed the standards within their practice. To support them in this we will be promoting the key themes within the standards and reviewing, updating and publishing our guidance that sits beneath the standards to promote professionalism and support pharmacy professionals in delivering person-centred care.

We will continue to promote awareness of pharmacy owners' responsibility to support and enable the professionalism of pharmacy staff to flourish.

We launched a consultation on religion, personal values and beliefs in pharmacy practice in December 2016 and will be reviewing the responses and asking our council to make a decision about any changes to what we say on this issue in the standards and guidance in the first year of this plan.

Providing further assurance to the public that pharmacy professionals are meeting the standards

We will continue to develop new arrangements to further assure that pharmacists and pharmacy technicians meet standards for safe and effective practice throughout their careers.

We are making these changes because it is clear that members of the public and the professions expect further assurance and because we have identified a number of improvements to our current approach which will support regulatory effectiveness and efficiency.

Following our pilot and its evaluation in 2016 we will ask our council to approve the draft consultation document so we can seek views from the sector and members of the public on our proposed changes and their impact.

We will consider what we hear through the comprehensive programme of communication and engagement planned for the consultation so that, where appropriate, we can make changes.

We will then present the proposals to our council for approval and set out a more detailed plan for phased implementation over the course of 2018 and 2019.

Setting the standards and quality assuring the initial education and training for pharmacists and pharmacy technicians

The pharmacy team plays a vital role in delivering care and helping people to maintain and improve their health, safety and wellbeing. The professionalism they demonstrate is central to maintaining trust and confidence in pharmacy.

Initial education and training must be fit for purpose to assure us that the pharmacy team has the necessary knowledge and professionalism to deliver person-centred care from day one.

In early 2017 we launched a consultation on the updated standards for the initial education and training of pharmacy technicians. The responses to that consultation will be considered by our council and, subject to any significant changes following the consultation, launched later in 2017/18.

Also in the first year of this plan, we aim to consult on changes to the initial education and training standards for pharmacists and are planning to launch these during 2018/19, informed by the outcome of the consultation.

Alongside this we plan to publish a discussion paper on revised education and training requirements for pharmacists educated and trained outside the European Economic Area, to inform our work in this area.

We will also be working to draft revised standards of education for pharmacist prescribers and considering new accreditation methodologies to support the new standards across our education regulatory function.

We will need to consider the impact of Brexit on the registration and renewal of EU qualified pharmacy professionals and we will work closely with other regulators as detail emerges from government.

Developing our data and insight strategy

In 2016, we brought together our data and research functions, to create a new team focused

on the development of insight. We believe that the insight we derive from our work can play an important part both in providing assurance about the safety of pharmacy services as well as promoting improvement in the sector.

In 2017/18, we will move forward with our plans to develop our technological capability to deliver insight. We will implement a new data warehouse, to bring together data from across our regulatory functions and from external sources, and invest in analytical tools to help us better understand the data that we hold.

We will continue our work to improve the quality and consistency of data that we hold, and in line with our commitment to equality, diversity and inclusion, we will continue to encourage pharmacy professionals to share data about their protected characteristics with us.

We will use this data to better understand the make-up of our registers, and improve the development of our equality impact assessments.

As we move towards the publication of inspection reports, we will work with stakeholders to understand how they will use this information in practice, and design approaches that enable more access to the information we hold. We will also lead the development on an inter-regulatory insight group, to ensure that best practice is shared within the sector.

We will also conclude our initial research into factors affecting quality in pharmacy, using our findings to help us shape our research priorities for the next three years.

Transforming our services and the way we work

In 2016, as part of our strategic aim to ensure that we are an efficient and effective regulator, we undertook a scoping exercise to consider what areas of our operations could be re-designed to make processes better for our registrants and other stakeholders.

Part of this work included commissioning a review of our IT architecture and the findings from that review will start to be implemented in the first year of the business plan.

We also identified two other projects, where work is underway and due to be completed in the first year of the plan. A new case tracker is being developed in-house to enable more streamlined monitoring of our concerns caseload, from the point at which a concern is received, through to a decision being made by one of our panels.

The other area is the development of a new portal for the submission and recording of continuing professional development (CPD) requirements which will aim to address feedback from registrants.

In 2017/18 we will develop a detailed plan for the service transformation programme and begin to implement this plan.

Delivering our regulatory functions

The GPhC has six regulatory functions:

- Registration
- Education (standards and accreditation)
- Standards (for professionals and registered pharmacies)

- Fitness to practise
- Inspection
- Continuing professional development

A number of these functions have specific programmes of work over the three years of the business plan, as shown on page 8. In line with our strategy we will be continuing to develop our other functions to ensure they are efficient and effective and delivering proportionate regulation.

One source of assurance of the performance of our regulatory functions is the review carried out by our oversight body, the Professional Standards Authority. In 2016/17 we achieved all the standards of good regulation and we plan to sustain that position as we head into 2017-2020.

We recognise that the public sees fitness to practise as one of our key roles as a regulator of pharmacy professionals. We will be continuing our work to ensure that we conduct timely investigations into the concerns that we receive and ensure that our approach remains proportionate especially for cases referred to a fitness to practise panel.

Controlling access to the register for pharmacists, pharmacy technicians and pharmacy premises is a significant responsibility.

We will be reviewing our processes to ensure that we meet our commitment to processing registration applications efficiently, make the process for renewal and payment simpler, and protect the public by promptly removing registrants and premises where appropriate.

We will continue to improve the quality and consistency of inspection reports and judgements, ensuring that the evidence to support judgements is clear, with robust

evidence to demonstrate good practice, areas of improvement or failed standards. We will refine our quality assurance mechanisms, including peer review, to focus on and address areas of actual or perceived inconsistency.

We are going to build on the collecting, sharing and promoting of learning from our regulatory activities, for example, through articles on inspection outcomes in Regulate.

In order to achieve the greatest efficiencies and to be a more effective regulator we will be looking to work with the other health professions regulators on issues and areas of shared interest. We will continue to work with the wider health sector and will review and maintain our memoranda of understanding with these bodies. We will be reviewing the data we generate from our regulatory activity and planning how to use this to become a more intelligence-led regulator and to share our learning with stakeholders.



Annual plan 2017/18: key programmes of work

Developing our approach to regulating registered pharmacies to provide assurance and encourage improvement

In 2017/18 we will:

- develop and consult on detailed rules once parliamentary legislation has been approved and our powers are commenced
- publish and consult on updates to our regulatory model for registered pharmacies including:
 - the introduction of further improvements to our inspection model
 - our proposals for publication of reports
 - developing further our intelligence work stream
- implement the statutory framework (enforcement powers) dependent on Rules timelines
- carry out a consultation on new guidance for owners covering unregistered staff working in registered pharmacies, including pharmacy staff and managers

Equality diversity and inclusion implications

Objectives

- Guidance must take into account the outcomes of consultation and engagement with diverse groups of registrants, the public and their representative organisations
- Inspection arrangements must be flexible and responsive in terms of equality and diversity
- Our inspection reports must be easily accessible and published in a variety of formats

Actions

- Conduct an EIA for the plans developed to provide more flexibility in inspection arrangements
- Carry out an analysis of potential impact of the regulatory model for registered pharmacies at an early stage
- Explore EDI considerations for inspection reports, including accessibility for different audiences and managing requests for reports in alternative formats

Promoting professionalism through the standards for pharmacy professionals and related guidance

In 2017/18 we will:

- launch our new standards for pharmacy professionals and support registrants to embed the standards in their practice through a comprehensive programme of communications and engagement
- agree, following consultation, new guidance on religion, personal values and beliefs
- develop and consult on draft guidance on raising concerns and whistleblowing

Equality diversity and inclusion implications

Objectives

- Standards for pharmacy professionals must be easily accessible using a variety of formats
- Guidance supporting the standards for pharmacy professionals must benefit from consultation and engagement with diverse groups, registrants, the public and their representative organisations and take into account their responses

Actions

- Review and update the existing equality impact assessment (EIA) associated with the standards and ensure the accessibility of the standards and supporting resources
- Produce an EIA summary and continually update it
- Conduct an EIA and resulting action plan for the guidance on religion, personal beliefs and the guidance on raising concerns and whistleblowing and update at all stages of implementation



Providing further assurance to the public that pharmacy professionals are meeting the standards

In 2017/18 we will:

- consult on proposals which will further assure the public that pharmacy professionals are meeting the standards, following these steps:
 - the draft consultation document is approved by our council
 - the consultation takes place
 - we analyse and report on the outcomes of the consultation
 - the council reviews the responses to the consultation
 - the council agrees the revised approach to continuing professional development framework (subject to the consultation response)
- prepare for the implementation of the revised arrangements working with pharmacy representative groups
- develop a detailed communications and engagement plan to promote understanding and support involvement and compliance with the new model
- promote the learning and evidence we have received from the pilot and evaluation studies with other regulatory bodies

Equality diversity and inclusion implications

Objectives

- The framework must reflect the diverse needs of pharmacy professionals
- The framework must reflect the needs of the countries of Great Britain by being adaptable to the different practice settings in those countries
- An inclusive approach to engagement and consultation in the policy development phases

Actions

- Review and update the EIA developed in previous phases of testing, piloting and evaluation, using information drawn from the consultation and engagement with people and organisations affected by the proposals

Setting the standards and quality assuring the initial education and training for pharmacists and pharmacy technicians

In 2017/18 we will:

- publish new standards for the initial education and training of pharmacy technicians
- carry out further engagement with the sector and begin a formal consultation on new standards for the initial education and training of pharmacists
- review and consult on changes to the education standards for pharmacist independent prescribers
- working with others, establish a new work stream looking at our role in relation to the quality assurance of pharmacist and pharmacy technician pre-registration training in Great Britain. We are planning to:
 - analyse research on key issues across pre-registration pharmacy training
 - engage with funders, commissioners and providers of education and training
 - publish a discussion paper and draft proposals
- begin our review of the accreditation methodology for both pharmacist and pharmacy technician initial education and training, including:
 - carrying out an evaluation of our MPharm interim events
 - carrying out research and analysis of distance-based learning for pharmacy technicians
 - engaging with national awarding bodies, pharmacy schools and FE Colleges

Equality diversity and inclusion implications

Objectives

- Standards for initial education and training of pharmacy professionals must benefit from consultation and engagement with diverse groups, registrants, the public and their representative organisations and take into account their responses

Actions

- Provide evidence of early EDI considerations in development of the consultation
- Develop an EIA for standards
- Complete a summary EIA for circulation and updates



Developing our data and insight strategy

In 2017/18 we will:

- implement our new data warehouse and invest in new analytical tools
- build on the initial work of our data quality and governance group to build a consistent approach to how we collect , manage and analyse our data
- continue the roll out of a standardised approach to collecting data on protected characteristics
- work with stakeholders to co-design our approach to sharing data and analysis arising from our regulatory functions
- establish an inter-regulatory insight group
- conclude our initial research on factors affecting quality in pharmacy
- working with colleagues in the inspection team, develop and publish insight reports into key themes within pharmacy, drawing on data from our own inspections as well as other sources (where possible and appropriate)

Equality diversity and inclusion implications

Objectives

- Our work must benefit from and must take into account baseline EDI data

Actions

- Continue the roll out of a standardised approach to collecting data on protected characteristics
- Develop a portal for a suite of GPhC EDI data accessible to staff

Transforming our services and the way we work

In 2017/18 we will:

- revise and update the IT strategy
- implement the governance arrangements for the IT architecture delivery plan
- implement the revised case tracker
- implement the revised CPD portal
- develop the wider service transformation plan

Equality diversity and inclusion implications

Objectives

- The service transformation project must make sure new services are accessible and meet the needs of everyone using them

Actions

- Undertake an EIA of the revised IT strategy and the service transformation plan
- Complete summary EIAs for circulation and updates

