



Consultation on cases for non-referral to the RPSGB Investigating Committee

We welcome the opportunity to respond to your consultation. Our comments are:

- A1 The emphasis of the proposed new process seems to be that, providing the individual pharmacist (and the Superintendent Pharmacist and/or Pharmacy owner where relevant) accepts a mistake has happened and is prepared to learn from the experience, their case will not be referred to the Investigating Committee. This seems to us to be a positive step, being more akin to a PCT Performance Review process, ie. positive and supportive rather than confrontational and negative. It seems to us that pharmacists are much more likely to respond positively from the outcome than would otherwise be the case and would therefore support the principle.
- A2 Whilst pharmacy practice is not our area of expertise, the criteria appear to be in proportion and certainly deal with the generic issues. We do not feel there are any obvious gaps and do not feel the table needs additional criteria.
- A3 We see no reason why single one-off dispensing errors should not encompass errors in the whole supply chain, as proposed.
- A4 Again we feel the proposed course of action is reasonable and in keeping with the overall aims of the proposal.
- B1 We do not feel we have the expertise to comment on question, but do feel that, if possible, as much use as possible should be made of this non-referral process.
- B2 The proposed additions to the process as described in Panel 4 seem reasonable to us.
- B3 If the proposal to extend the process from single one-off dispensing errors to encompass mistakes made during the whole dispensing process then we believe it may be necessary to modify some of the non-referral criteria, ie. bullet points 3, 4, 5, 6 and 7.
- B4 Yes we feel that the proposed course of action is appropriate.
- C1 Yes, but only where allegations have been admitted or are proven.

C2 Yes, however it may be appropriate for this function to be transferred to the General Pharmaceutical Council in due course, so that Public confidence in the independence and fairness of the process is maintained.

Further Comments We support the aims of the Society in trying to move the process for dealing with minor misdemeanours, that cause no substantial harm to the patient, away from the highly stressful and confrontational nature of a “traditional” FTP process. We feel the proposals make it much more likely that pharmacies and individual pharmacists will find the process positive and should encourage a learning culture to develop from critical incidents for the ultimate benefit of patients.



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For and on behalf of

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