



APTUK Position Statement

Supervision – An enabler for modern patient-centred Pharmacy Services

Aim

This paper is intended to provide a clear statement of the APTUK position on supervision. It is not intended to provide detailed arguments and evidence but will provide a principle based approach based on logic and common sense

Background

Under the Health Act 2006, the Department of Health (DH) took powers to establish the concept of a Responsible Pharmacist (RP) which were brought into force through the Responsible Pharmacist Regulations 2008. The Health Act also gave powers to enable certain aspects of supervision of the dispensing, sale and supply of medicines to be delegated to other registered and suitably trained health professionals; for example pharmacy technicians.

The 'Supervision' debate is well under way with organisations setting out their views on this change. Since pharmacy technicians will be affected by such changes, APTUK, as the recognised professional leadership body for pharmacy technicians needs to have a clear and publicly stated position.

Supervision is part of a wider process in pharmacy designed to maximise the clinical skills of pharmacists and improve services for patients and the public.

Accountability

There is a widely held view that that the RP (or the pharmacist with personal control as it was known previously) remains accountable for work carried out by pharmacy technicians and other pharmacy support staff. There is a degree of logic in this view in that the RP does, indeed, carry responsibility to ensure that staff are trained and competent to carry out delegated tasks. However, pharmacy technicians are now registered healthcare professionals and with that status comes responsibility and accountability for their own actions. So where does that leave the RP? The Crown Prosecution Service (CPS) have published guidance on this matter which can be seen at: http://www.cps.gov.uk/legal/l_to_o/medicines_act_1968/. This guidance makes clear that, providing the RP has exercised all due diligence, then they have a defence in law against errors or omissions made by pharmacy technicians working under their supervision. This position ensures the RP is held responsible for the overall safety of the pharmacy and also holds individual pharmacy technicians to account for the quality of their work.

Registration

Mandatory registration of pharmacy technicians commenced on 1 July 2011. The title 'Pharmacy Technician' is now protected in law and standards have been set for initial entry to the register as well as for professional conduct helping to ensure that registrants are competent and safe to practice. It also means that, as registered healthcare professionals in their own right, they must accept responsibility and accountability for their work. It also provides a fitness to practice framework for those whose fitness to practice is impaired. Through education and practice standards patients and the public are protected from poor practice. All registrants are required to make an annual declaration that they have appropriate indemnity cover in place.



Association of Pharmacy Technicians UK (APTUK)

The Professional Leadership Body for Pharmacy Technicians

Delegation

Before listing any task that may be delegated only to a registered pharmacy technician, it is important to understand that every decision on delegation should be preceded by a risk assessment. The level of the risk assessment should be determined by the nature of the task; some will need to be formal and written others may need on-the-spot professional judgement. A further principle of delegation is that pharmacy technicians must recognise the limits of their competence and refer to a pharmacist when necessary. This already happens in practice and this should be reinforced by embedding, as a behavioural principle, in all pharmacy technician pre registration training.

APTUK considers that the following tasks could be delegated to pharmacy technicians and be undertaken in the absence of a pharmacist:

- Assembly of prescriptions
- Final accuracy checking of prescriptions
- Sale of GSL medicines
- Sale of Pharmacy (P) medicines (under rigid protocols) – A supermarket assistant can process the sale of packs of up to 16 paracetamol tablets – it seems sensible and logical that a trained pharmacy technician could be trusted to sell the same product but in larger packs. On this basis, further sales of P medicines should be possible subject to appropriate risk management.
- Processing and handing out of repeat prescriptions – where a patient is stable, understands their medicines well, no new medicines have been prescribed and the patient has no questions about their medicine; we believe that, providing a clinical check has taken place, there is no risk in a pharmacy technician undertaking this task.
- Elements of the pharmacy contract services, such as preparation for MURs, smoking cessation and other developing services such as roles in 'healthy living pharmacies'

The list above is not exhaustive and other tasks should be considered but subject to that most important principle – understanding and applying the limits of competence. Robust and fully implemented Standard Operating Procedures are also an important part of delegation.

Risk Management

It is clear that delegating tasks to staff with a different skill set will involve risk. Risk management is a critical process which must be understood by all pharmacy professionals and applied in a rigorous and consistent way. The importance of this process cannot be underestimated. We believe that there are two separate broad areas of risk from delegation that need to be managed:

- 1. Risk to Patients** – This is a key risk and one which can generate a lot of emotion, however, a well conducted and robust risk assessment will determine the level of risk. Once risks have been identified and understood plans can be developed to manage them. As mentioned earlier in the paper, a personal approach to risk management through recognising one's limits of competence is absolutely crucial and needs to be understood and applied by every pharmacy professional
- 2. Risk to service standards** – It seems obvious that there will be occasions when pharmacy technicians will come across situations that requires them to refer to a pharmacist (or other healthcare professional such as a GP). If this situation happened frequently and a pharmacist were not readily



Association of Pharmacy Technicians UK (APTUK)

The Professional Leadership Body for Pharmacy Technicians

available then patients will perceive this as a reduction in service level. Conversely, at busy times, if pharmacy technicians were able to undertake tasks normally undertaken by pharmacists, this would help to alleviate pressure and improve service levels. It is the view of APTUK that sensible risk management, the development of local protocols and the application of professional judgement can help counter any reduction in service level.

APTUK position

There is already strong evidence that pharmacy technicians can take on a range of roles including final accuracy checking, medicines management and pharmacy management in a controlled way and without increasing risk. APTUK supports changes to supervision and greater delegation of tasks to pharmacy technicians who are now all registered. Personal and organisational risk management must be in place and rigorously applied.

Ensuring that pharmacy technicians do have the required level of competence is a critical part of the risk management strategy. If there is variation in the standards then this becomes a local issue which will influence the level of delegation that can occur and this falls within the role of the Responsible Pharmacist. If, following the introduction of the statutory register, it becomes clear that there are large variations in pharmacy technician levels of competence, this will need to be addressed at both a local and national level. Whilst national systems and processes can help, local employers will play the biggest part in recruiting and training pharmacy technicians to the right standard.

All pharmacy stakeholders need to work together to develop a strong and safe model of supervision. APTUK, as the professional leadership body for pharmacy technicians, needs to be actively involved in the supervision debate and any consultations. APTUK will work with key individuals and organisations on the development of supervision.

APTUK October 2011