



APTUK response to the Department of Health and Social Care's consultation on Pharmacy Supervision

Proposal 1 is to amend the Medicines Act 1968 and Human Medicines Regulations 2012 to enable pharmacists (should they wish) to authorise a registered pharmacy technician to carry out, or supervise another person to carry out, the preparation, assembly, dispensing, sale and supply of POMs and P medicines.

Do you agree or disagree with proposal 1?

Agree

Neither agree nor disagree

Disagree

If you have any additional information to support your answer, please provide details (maximum 350 words).

I strongly believe that the government's proposal for enabling Pharmacy Technicians to carry out or supervise the preparation, assembly, dispensing, sale and supply of POMs and P medicines is a long overdue and positive step which will benefit patients and the wider profession.

Pharmacy Technicians have the knowledge, skills and expertise to enhance patients' access to pharmaceutical care. Through extensive pre-registration and post-registration training and experience, Pharmacy Technicians are perfectly placed to safely and effectively undertake the role described in this proposal.

The proposal will support the NHS Workforce and Recovery Plans across the UK, enabling the skills and knowledge of registered Pharmacy Technicians to assist in the safe supply of medicines. Skill mix in pharmacy will be enhanced and barriers to effective implementation of new services and novel ways of working will be removed.

In addition, the proposal is a critical enabler in attracting people to the pharmacy professions, advancing professional practice and enhancement of the role of the wider pharmacy team. I am acutely aware of the challenges in recruitment and retention of Pharmacy Technicians in community pharmacy and as such enhanced roles such as that outlined in this proposal, and in the recent PGD consultation will increase training, recruitment and retention.

Following any changes to legislation, Pharmacy Technicians should be provided with appropriate training and support to enable them to effectively utilise the opportunities such a change would bring. As my professional leadership body, APTUK will work to support Pharmacy Technicians through the production of professional guidance and will encourage all Pharmacy Technicians to always utilise their professional judgment.

Proposal one offers an exciting opportunity for Pharmacy Technicians to safely expand their scope of practice to widen patient access to medicines.

Proposal 2 will enable a pharmacist to authorise any member of the pharmacy team to hand out checked and bagged prescriptions to patients or patient representatives. This is to align 'bricks and mortar' pharmacy premises with current practice for home delivery, locker box and other delivery services.



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Do you agree or disagree with proposal 2?

Agree

Neither agree nor disagree

Disagree

If you have any additional information to support your answer, please provide details (maximum 350 words).

I believe that as with proposal one, this proposal will enhance patient access to pharmaceutical care whilst maintaining safety and as such support this proposal.

Our non-registered colleagues in pharmacy, such as dispensing assistants or medicines counter assistants, are recognised as vital members of the team who work hard for the communities in which they work. As such I support utilising their skills to increase the availability of medicines for patients.

Non-registered staff operating under any changed legislation should be provided with appropriate training, support and standard operating procedures to ensure that patient safety is maintained.

Proposal 3 is to allow a registered pharmacy technician to be responsible for a hospital aseptic facility in the same way that a pharmacist is under the current law.

Do you agree or disagree with proposal 3?

Agree

Neither agree nor disagree

Disagree

If you have any additional information to support your answer, please provide details (maximum 350 words).

Aseptic units are built on experienced and highly skilled teams of Pharmacy Technicians and Pharmacists. Increasingly, Pharmacy Technicians are the most skilled and experienced pharmacy professionals in these units, safely providing vital services to some of the most vulnerable patients.

This proposal would enable Pharmacy Technicians to utilise the specialist skills and knowledge they have, to take responsibility for the safe and effective operation of aseptic units. Many Pharmacy Technicians practicing in aseptics have extensive post-registration training and qualifications and are well placed to take this responsibility with the support of the correct framework.

I would support a framework outlining the skills, qualifications and experience required by Pharmacy Technicians undertaking the role outlined in proposal three.



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The recruitment and retention of Pharmacy Technicians in aseptic units is a challenge across the UK. The additional responsibility outlined in this proposal will support development of Pharmacy Technician roles and career frameworks in aseptics, helping to encourage training, recruitment, and retention.

We propose that Regulation 220 of the Human Medicines Regulations 2012 is brought into line with the changes already made to other legislation concerning the supply of medicines 'at or from' a registered pharmacy premises. This is to better reflect current practice, particularly in the provision of delivery services from a registered premises.

Do you agree or disagree with this proposal?

Agree

Neither agree nor disagree

Disagree

If you have any additional information to support your answer, please provide details (maximum 350 words).

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Do you think there any other barriers to modernising pharmaceutical practice in government legislation that we should consult on removing in the future?

Yes

No

Don't know

If you answered yes, please provide details of these barriers to support your answer (maximum 350 words).

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If you have any further information to inform the consultation-stage impact assessment on the costs and benefits of each option, please provide it here (maximum 350 words).

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If you have any further comments on any aspect of the draft statutory instrument, please provide it here (maximum 350 words).

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