



Department of
Health

An Roinn Sláinte

Máinnystrie O Poustie

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The Introduction of Statutory Regulation of Pharmacy Technician Workforce in Northern Ireland

Consultation Summary Report

June 2022

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SECTION 1: INTRODUCTION

On the 21 March 2022, the Department of Health (the Department) launched a consultation to consider the Introduction of Statutory Regulation of Pharmacy Technician Workforce in Northern Ireland (NI). The consultation ran for 8 weeks and closed on 20 May 2022. Significant pre-consultation discussion was held with informed stakeholders and their views were appropriately incorporated into the consultation document.

This consultation sought to seek views on the proposal to regulate pharmacy technicians in NI and is the first step on a journey to bring forward this new healthcare profession.

The proposal will establish pharmacy technicians as a registered and regulated profession in NI and enable the Regulator to strengthen its role in protecting patients and promoting high standards, thereby, enhancing the public's confidence and trust in pharmacy practice.

A total of 113 responses were received during the consultation. This document presents the feedback received.

SECTION 2: OVERVIEW OF CONSULTATION RESPONSES

There were 113 consultation responses received from a broad range of stakeholders. These included pharmacists, pharmacy technicians, individuals, voluntary community/third sector bodies, professional bodies, unions, public/statutory bodies and pharmacy businesses.

A statistical breakdown of responses is provided at [Annex A](#).

On occasions respondents did not complete the questionnaire fully, but chose to provide comments in their own format. Where such additional comments were provided, these have been reflected in the summary. Not all respondents chose to answer every question or to provide additional comment.

A full list of respondents to the consultation is at [Annex B](#).

SECTION 3: SUMMARY OF RESPONSES

Introduction of Statutory Regulation (Questions 1, 2, and 3).

The consultation asked

Q1. Do you support the proposal to establish a statutory Register of pharmacy technicians for NI? If you disagree please explain why.

Response

In total 113 consultation responses were received. Of these, 111 respondents directly answered Question 1 in relation to the statutory regulation of the pharmacy workforce in NI. The majority, 90 responders, indicated a preference for regulation. There were 2 responses who did not indicate whether they supported or did not support statutory regulation.

Many respondents noted the important role played by pharmacy technicians within pharmacy teams and the disparity that technicians are regulated in Great Britain but not in NI.

Many expressed the view that pharmacy technicians have proven themselves to be a crucial component of the pharmacy health care system and that the establishment of a statutory register for pharmacy technicians will promote a culture of accountability and improve patient safety and health outcomes. Many believe that regulation will allow for further advancement in career.

Feedback was received that making the term “pharmacy technician” a protected title would help to give confidence to the public that such professionals are adequately trained. It would also bring NI colleagues in line with the rest of the UK.

A number of responses (21) did not support the regulation of the pharmacy technician workforce in NI. Reasons supporting this were; the cost of the fees for individuals, insurance and the level of salary; the time required for registration and the continuous professional development could impact negatively on individuals’ work life balance;

There were also liability concerns which refers to the fear, which some respondents, expressed at being struck off the register and being made unable to work in the case of an error; final issue raised was that individuals felt they were already doing the job and therefore regulation is not necessary.

Table 1. Reasons stated for not introducing regulation.

Cost	17
Time	11
Liability	3
No benefit	2
Current working practice	1

*Some respondents had multiple reasons, while others provided no explanation, so total does not equal 21.

Department's Response

The Department welcomes the views and the broad agreement for the statutory regulation of the pharmacy technician workforce in NI. It is the intention that regulation will provide a clear framework to enable pharmacy technicians to work with pharmacists and other pharmacy staff to support the delivery of safe, effective and efficient pharmacy services for patients.

The Department notes all of feedback received in the responses and the issues raised will be considered in the development of the policy with the regulator and all relevant stakeholders.

The consultation asked

Q2. Do you agree that the statutory register for pharmacy technicians should be maintained by the regulator for pharmacists and pharmacy premises in Northern Ireland, the Pharmaceutical Society of NI (PSNI)? If you disagree please explain why.

Response

The majority, 86 responses, indicated a preference that a NI arrangement for pharmacy technician regulation would be best delivered by the Pharmaceutical Society of Northern Ireland (PSNI). Two respondents neither agreed nor disagreed and the remaining 25 disagreed with the register being maintained by the PSNI.

The reasons stated for not supporting the PSNI to hold the register were; the cost of fees (respondents stated that PSNI's fees for pharmacists were higher than those charged in the rest of the UK by the GPhC); concern over making errors and being held accountable in court resulting in loss of employment; there should be another body performing this function; transfer between UK comparative pharmacy regulators and registration criteria should be in line with the rest of the UK.

Table 2. Reasons stated for the register not being maintained by the PSNI.

Cost	5
Liability	1
No benefit	2
No pharmacy technicians on PSNI board	1
Not enough information	1
Other body	7
UK comparative	4
Unsure	2

*Some respondents had multiple reasons, while others provided no explanation, so total does not equal 25

Department's Response

The Department welcomes the views and the broad agreement that the statutory register for pharmacy technicians should be maintained by the regulator for pharmacists and pharmacy premises in Northern Ireland, the Pharmaceutical Society of NI.

The Department notes all of feedback received in the responses and the issues raised will be considered in discussion with the regulator and all relevant stakeholders.

The consultation asked

Q3. Do you agree with the proposal that to enable a pharmacy technician to be registered in NI, they must have completed one of the recognised competency based qualifications or a combined competency qualification accredited by the regulator. If you disagree please explain why.

Response

There was an overwhelming support, 94 responses, for the requirement for registered pharmacy technicians to have completed recognised competency based qualifications. Some comments agreed that required training and standardised qualifications would help to improve patient safety. It was also acknowledged that in order for the regulator to manage the register efficiently and safely, minimum knowledge and educational standards must be met before an individual can be registered as a pharmacy technician. It was also stated that entry and continuous professional development requirements are kept in line with those in the rest of the UK.

A number of respondents highlighted the need for clear identification and consideration of issues impacting upon education and training and continuing professional development.

The majority of respondents agreed that public confidence and assurance in pharmacy regulation would be enhanced through UK-wide standards. Some believed this was important to facilitate movement of pharmacists and believed that consistent standards seem logical as medicines legislation is often UK-wide.

Three respondents neither agreed nor disagreed with the proposal and the remaining 16, disagreed.

Table 3. Reasons stated for opposing education requirements for pharmacy technicians.

Already qualified	11
No Benefit	1

Employers' decision	1
Time	1

*Some respondents had multiple reasons, while others provided no explanation, so total does not equal 16

Department's Response

The Department welcomes the responses received. The views submitted will be considered as part of the development of the qualifications recognised for pharmacy technicians in NI.

SECTION 4: EQUALITY IMPLICATIONS

The consultation asked

Question 4: Are there any considerations and evidence that you think the Department should take into account when assessing the extent of the likely impact of the policy on groups of people within each of the Section 75 categories of the Northern Ireland Act 1998 or The Human Rights Act 1998 arising as a result of the proposed changes?

Response

The Department invited views on an initial equality screening of the proposals in the consultation document. This initial screening did not identify any adverse impacts on any of the Section 75 groups. Of the 113, 28 respondents felt there could be adverse impacts on the section 75 groups. However 81 respondents felt there would be no adverse impact on these groups. There were 4 questionnaires that left this section blank. Of the 113 that answered the question related to equality implication, 21 provided comment.

Table 4.Reasons stated for 'Yes' Response to Qu 4.

Cost	1
Cost/Time	1
Ensure Inclusivity	1
Equality - Age	2
Equality - Gender	2
Equality - Part-Time	1
Equality - Pay	3
Equality - Religious	1
Equality Screening	1
Other Qualifications	1
Pharmacy Students	1

*Some respondents had multiple reasons, while others provided no explanation, so total does not equal 28

Department's Response

The Department welcomes the comments received and will fully consider all comments in progressing this work.

The consultation asked

Question 5: Are the proposed changes likely to have an adverse impact on rural areas? If yes, please provide comment on how these adverse impacts could be reduced or alleviated?

Response

The Department presented findings from its Initial Regulatory Impact Assessment (Initial RIA) in the consultation document. The consultation invited comment from respondents on the Initial RIA in an effort to gather further evidence on potential impacts likely to arise from the options outlined. Many respondents took the opportunity to provide further comment and the Department is grateful for the insight and detail provided.

Many respondents stated that they agreed with the preliminary conclusions indicated in the Initial RIA, with 27 providing further comment. Areas identified for further analysis included: more detailed assessment of the cost and impact of regulating pharmacy technicians; further detail regarding costs to registrants and businesses; costs to the public purse (for example to the Department and to the NI Assembly).

Table 5. Responses provided on the potential adverse impact on rural areas.

Attracting staff	5
Cost	3
Travel to complete CPD	7

Department's Response

The Department welcomes all responses and the comments received will be fully consider in progressing this work.

SECTION 5: NEXT STEPS

The primary purpose of this consultation was to seek opinions and to invite feedback regarding the proposal to introduce statutory regulation of the pharmacy technician workforce in Northern Ireland.

The provision of further evidence from stakeholders is important to assist the Department's efforts to develop an evidence base, on which to further consider and progress the various strands of this work. The Department welcomes all responses and evidence received and will identify any further work necessary to take forward the next steps in the short, medium and longer term to bring about this new healthcare profession in Northern Ireland.

The consultation feedback will be considered by the Minister of Health, the Department will then develop a detailed project plan with PSNI to take this issue forward.

Statistical breakdown of responses

Question	Response			
	Yes	No	Blank	Total Respondents
Question 1: Do you support the proposal to establish a statutory Register of pharmacy technicians for NI?	90	21	2	111
Question 2: Do you agree that the statutory register for pharmacy technicians should be maintained by the regulator for pharmacists and pharmacy premises in NI, the Pharmaceutical Society of NI (PSNI)? If you disagree please explain why.	86	25	2	111
Question 3: Do you agree with the proposal that to enable a pharmacy technician to be registered in NI, they must have completed one of the recognised competency based qualifications or a combined competency qualification accredited by the regulator. If you disagree please explain why.	94	16	3	110
Question 4: Are there any considerations and evidence that you think the Department should take into account when assessing the extent of the likely impact of the policy on groups of people within each of the Section 75	28	81	4	109

categories of the Northern Ireland Act 1998 or The Human Rights Act 1998 arising as a result of the proposed changes?				
Question 5: Are the proposed changes likely to have an adverse impact on rural areas? If yes, please provide comment on how these adverse impacts could be reduced or alleviated.	<p>19</p>	<p>91</p>	<p>3</p>	<p>110</p>

Annex B List of Respondents

Organisations that responded to the consultation:

Association of Pharmacy Technicians UK
Belfast Health & Social Care Trust
Boots
Community Pharmacy Northern Ireland
Gordons Chemist
National Pharmacy Association
National Pharmacy Technician Group, Scotland
Northern Health & Social Care Trust
NIPSA
Pharmaceutical Society of Northern Ireland
Pharmacy Forum Northern Ireland
Police Service of Northern Ireland
South Eastern Health & Social Care Trust
Southern Health & Social Care Trust

List of Consultation questions

Q1. Do you support the proposal to establish a statutory Register of pharmacy technicians for NI? If you disagree please explain why.

Q2. Do you agree that the statutory register for pharmacy technicians should be maintained by the regulator for pharmacists and pharmacy premises in NI, the Pharmaceutical Society of NI (PSNI)? If you disagree please explain why.

Q3. Do you agree with the proposal that to enable a pharmacy technician to be registered in NI, they must have completed one of the recognised competency based qualifications or a combined competency qualification accredited by the regulator. If you disagree please explain why.

Q4. Are there any considerations and evidence that you think the Department should take into account when assessing the extent of the likely impact of the policy on groups of people within each of the Section 75 categories of the Northern Ireland Act 1998 or The Human Rights Act 1998 arising as a result of the proposed changes?

Q5. Are the proposed changes likely to have an adverse impact on rural areas? If yes, please provide comment on how these adverse impacts could be reduced or alleviated.