

About you

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2 How your response will be published

I would like my response to be published in its entirety

3 What is your name?

Name:
Royal Pharmaceutical Society

4 What is your email address?

Email:
ross.barrow@rpharms.com

5 Are you responding as an individual or on behalf of an organisation?

Organisation

Organisation details

6 Name of organisation

Name of organisation:
Royal Pharmaceutical Society

7 Information about your organisation

Please add information about your organisation in the box below:

RPS is the professional leadership body for pharmacists working in all sectors across Scotland, England and Wales.

Our mission is to put pharmacy at the forefront of healthcare.

Our vision is to become the world leader in the safe and effective use of medicines.

We champion the profession, and are internationally renowned as publishers of medicines information.

We promote pharmacy in the media and government, lead the way in medicines information, and support pharmacists in their education and development.

Question page 1

8 What are your views on the establishment of a Patient Safety Commissioner to scrutinise safety issues, deliver systematic improvements and amplify the patient voice in the provision of health care?

Please provide your response in the box provided.:

Royal Pharmaceutical Society (RPS) in Scotland supports the establishment of a Patient Safety Commissioner (PSC), for the purposes laid out in the policy memorandum.

Despite there being multiple ways patients can make their voices heard, RPS Scotland is of the view that most people will not use these for multiple reasons, including:

- Lack of awareness about how to make their voice heard
- Not empowered to make their voice heard
- Systems are too complex to navigate
- Do not feel they are qualified to question or challenge situations
- Lack of awareness of an issue or that they have not been heard until too late

- Reluctance to speak badly of a clinician they have an existing relationship with or like as a person
- Fear of impact on their care or the care of a family member
- Do not understand or do not want to take on bureaucracy
- Do not want to make a fuss
- 'Them' and 'us' situation in some organisations

It is imperative that the PSC acts as an enabler for patients, by providing an opportunity for people to make their voice heard and changing the culture to empower people to make their voices heard. In order to do this, it is essential that the PSC engages with all stakeholder groups with an interest in patient safety, including:

- Patients
- Families
- Professional Bodies
- Researchers

9 What are your views on the proposed role and responsibilities of the Patient Safety Commissioner?

Please provide your response in the box provided.:

The scale of the role is potentially very large, therefore setting initial priorities is useful to help public understanding of what the PSC is able to do.

RPS is of the belief that the PSC should prioritise patient safety in a medicines and medical devices context, using the lessons already learned, to make improvements to patient safety and minimise the risk of harm.

It should then be up to the PSC to work flexibly and set their own priorities as they see fit to ensure it can be directed to areas where patient safety is at risk and respond to issues the public raise.

Expansion to the PSC role should be guided by the information received by them from stakeholder groups (i.e. patients, families, professional bodies, research, etc.) raising concerns over patient safety issues, where a trend has been identified or where an individual incident may give rise to the suspicion of a broader issue.

It will have to be clear from that start how the role will work with and integrate into the existing Scottish Patient Safety Programme and Healthcare Improvement Scotland more widely.

The main functions of the PSC should be:

- A listener and patient advocate.
- A straightforward patient contact.
- To investigate concerns and hold systems to account where necessary
- To promote patient safety.
- To develop 'Principles of Core Patient Safety' as a benchmark for patient safety.
- To encourage organisational reflection, evaluation and change where necessary in line with the Principles.
- To highlight concerns about delays or failures to act to improve patient safety, it will be vital to ensure that the use of outcome measures is in place to evidence the value and impact of the PSC and the work they are doing.

Finally, given that much of the legislation and regulation around medicines is reserved, a mechanism will be required which links the Scottish Patient Safety Commissioner into appropriate UK bodies, such as the Medicines and Healthcare Products Regulatory Agency. One example of this would be any actions taken in relation to prescribing of valproate in pregnancy, as regulation of prescribers and dispensing pharmacies is undertaken at a UK level.

10 What are your views on the proposed powers of the Patient Safety Commissioner?

Please provide your response in the box provided.:

As outlined in the Bill, the Commissioner will have no power to make awards or seek redress, assist individuals in seeking redress. However, they will have the power to require a Health Board to provide information. It would need to be made clear how the PSC would resolve issues highlighted by investigations and how health board should be compelled to make these changes. It is important that any investigation carried out by the commissioner is not duplicating any other investigations being carried out by interested parties.

11 What are your views on the appointment process for the Commissioner and the funding being provided to enable them to carry out their role?

Please provide your response in the box provided.:

It is very important that the PSC can act independently, and RPS Scotland welcomes the reference to the PSC's independence in part one of the Bill's schedule. It was suggested in the Cumberlege report that the PSC should report directly to the Health Committee to ensure this independence. RPS Scotland is of the belief this is a sensible recommendation, and therefore proposes that the PSC for Scotland would report directly to the Health, Social Care and Sport Committee. This would also provide a direct link to the Committee, allowing the PSC to receive appropriate referrals from the Committee to investigate where appropriate.

RPS Scotland agrees with the provisions made in the Bill for funding so the PSC can carry out their role and welcomes the provision for the PSC to appoint staff. To ensure the PSC's functions can be carried out, the PSC would need the support of a team behind them to focus on investigations, analysing data, interviewing, and building relationships with organisations. RPS Scotland would like to see a staff team who could support the PSC to carry out these

functions, as they are clearly too broad to be carried out by one individual.

12 Would you like to see any changes to the Bill? If so, what?

Please provide your response in the box provided.:

It is very important that there are clear outcome measures in place to evidence the impact and value of the PSC. RPS Scotland would like to see a section on outcome measures added to the Bill so the public can understand what the objectives of the role will be and how these will be measured and reviewed. This will be critical to ensuring transparency and public confidence in the post.