



**British
Pharmaceutical
Students'
Association**

Dear Reader,

The British Pharmaceutical Students' Association (BPSA) is the official representative body of pharmacy students and pre-registration pharmacists in Great Britain. Established in 1942, the Association aims to support, advocate for and represent students and trainees within the pharmacy profession

The GPhC have drafted new guidance with regards to fitness to practise and we the BPSA Executive have created a response to this guidance and highlighted are views surrounding this.

Thank you for reading,

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Part 1

As an Executive we tend to agree on the GPhC's definition of fitness to practise. As pharmacy professionals we need to make sure that that our conduct represents the profession. However, there are mixed feelings about the wording used to describe one's professionalism. This may cause some students not to talk freely about issues e.g. mental health concerns. There should be more awareness on how wording of this document can affect individuals with any fitness to practice concerns

As an Association we strongly believe that mental health concerns should be addressed and the stigma around this. Note in our policy "This Association believes that supporting the mental health of pharmacists, pre-registration trainees and pharmacy students is of the utmost importance". (2018). We do not want this process to be harsh on students with mental health, therefore there needs to be clarity on the de-stigmatization of this.

Each group has responsibility in the fitness to practise process relevant to their work and experience. We believe and urge the GPhC to support students going through this process as this can impact one's life significantly. This should be a fair process and the regulator must make sure that all the requirements are fair.

As the term is so broad, the examples of the fitness to practise issues are adequate enough to give students and professionals an idea about what to raise as an issue. We also agree



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that there are various different organisations to help students, such as ourselves from students, the RPS, pharmacy support, etc.

There is not a great deal of guidance within the mental health issues as briefly highlighted above. We agree that there should be more guidance within this topic as this is very important within the pharmacy profession and amongst pharmacy students. Charities like Pharmacist Support and other organisations should be listed as a source of help for students to seek if need be.

Part 2

We agree to a great extent the fairness and robustness of the process people have to go through with fitness to practice. There should however be more detail on where to seek further help as mentioned previously. This may be a very stressful time for students and professionals, so a great deal of care and support is needed. Signposting is of utmost importance in this case.

The question was asked if there should be a time limit on the length of investigations and any other process, here are varying views on this. There is agreement that hearings and investigations are a very stressful period and any time constraints or prolonged length will put more stress on an individual. We recommend that there should be adequate amounts of communication to individuals involved to have piece of mind during these times.

We agree to an extent with the appeal process of any fitness to practise issues, with this being detailed, transparent and fair. It is important that individuals are aware of procedures and their options. It is important to note that if there is a more successful appeal process, any decision making processes may need to be reviewed

Part 3 and case studies

There is agreement with part 3 of this guidance as many of the comments of communication and support through process is vital for any individual. Furthermore, it is highlighted that disclosure and confidentiality is given a lot of importance



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The case studies given were seen to be quite helpful in aiding examples of different types of fitness to practise issues that may occur. Although there is an agreement that these should be more accessible and highlighted more clearly. This may be more helpful within the guidance itself.

We asked the question as to whether any specific groups of individuals may be impacted negatively, however as each case is different from the next, this may not be an issue

In summary, we as an Executive view the GPhC fitness to practise guidance important to use if an individual needs a resource to help with the process and any procedures. We see that any issues, including ones regarding mental health, should be taken with great precaution. Signposting and communication with individuals should be the first point of call in certain instances.