

RESPONSE FORM

Consultation on fees 2016/17

INSTRUCTIONS

This form needs to be used together with the consultation document.

Please indicate your answer to multiple choice questions by placing an **X** by your selection. You can also provide further comments in the free text field.

If possible, please send responses electronically using the response sheet below.

Responses can be sent by post, fax or e-mail to:

Consultation on fees 2016/17

Pharmaceutical Society of Northern Ireland
 73 University Street
 Belfast, BT7 1HL

Tel: 028 9026 7934
 Fax: 028 9043 9919

E-mail: Mark Neale, consultation coordinator fees2015@psni.org.uk

The deadline for consultation responses is 12noon 25 January 2016

Respondent details

I am responding: as an individual **or** on behalf of an organisation (please highlight)

Name	Gerard Greene
Job Title	Chief Executive
Organisation	Community Pharmacy NI
Address (optional)	5 Annadale Avenue, Belfast.
Email	ggreene@communitypharmacyni.co.uk
Contact tel (optional)	028 9069 0444

Information about you

**** Please complete this section if you are responding as an organisation**

Which of the following categories best describes your organisation?

Pharmacy representative body

Body representing patients or public

Government department

HSC organisation

University

Regulatory body

Other (please give details)

Responding as an individual

**** Please complete this section if you are responding as an individual**

Which of the following categories best describes you?

Pharmacist

Pharmacy student

Pre-registration student

Community pharmacy owner

Member of the public

Other healthcare professional

Other (please give details)

In our consultation summary reports we often include quotes from respondents. If we publish a quote from an individual in the consultation summary report we will not publish and link the quote to the name of the individual.

We do provide a list of the respondent's names at the end of the report.

However, if you do not wish all or part of your response including your identity to be made public, then please make that clear, otherwise we will assume that by responding to our consultation you have given consent to us publishing your name and the content (or part content) of your submission.

** If you wish your response to remain confidential, the Pharmaceutical Society NI will generally respect that request. However, the information you provide may be subject to disclosure under the Freedom of Information Act 2000.

List of Respondents

Are you content for your name to be listed in the consultation summary report?

Yes

No

Responding as an individual

Are you content for the comments you submit to be included in our consultation reports?

Yes

No

Responding on behalf of an organisation

Are you content for the comments you submit to be attributed to your organisation in our consultation reports?

Yes

No

Consultation questions

Q1. Do you agree with the Council's proposal to amend the 1994 General Regulations to the extent identified in this consultation paper and the attached draft amending regulations, pending a more comprehensive review of the overall fee charging structure?

Yes

No

Unsure

Further comments

As discussed in my accompanying letter, CPNI objects to the proposed fee increases.

Given the quantum of proposed fees for 2016/17, with further increases anticipated in future years, CPNI also disagrees with the proposal to revoke the opportunity to have lower fee bands for registrants over the age of 65 or 70 who wish to remain on the register but who may only practise in a limited capacity and also for non-residents who may wish to remain on the register but do not currently practise in Northern Ireland.

Q2. Do you accept that we have provided adequate information to explain the proposed fees and associated increases or amendments?

Yes

No

Unsure

Further comments

As mentioned in my accompanying letter, in order to make an informed response to this consultation it was necessary to review and compare the Annual Reports 14/15 (including Statements of Financial Activities) of both Pharmaceutical Society NI and GPhC.

In respect of financial projections, one key area remains uncertain, namely the legal costs which will be incurred by the Pharmaceutical Society NI to correct the legislative inconsistencies highlighted. We do not believe it is appropriate for registrants to be expected to pick up the costs associated with this work.

Q3. Do you agree that we have provided sufficient information on student registration and (pre-registration) examination fees to explain the proposed increases?

Yes

No

Unsure

Further comments

As detailed in my accompanying letter, the Pharmaceutical Society NI's student registration and (pre-registration) examination fees are currently around 10% higher than comparable GPhC fees, an increase to the proposed fee levels would increase this differential to closer to 20%. This is a significant cost differential for students and it would be helpful if this information had been disclosed to consultation respondents, with the reasons for this differential explained,.

Equally I note that while GPhC do not register students *per se*, rather they pay a fee to be enrolled into their pre-registration scheme, GPhC has agreed a student code of conduct and student fitness to practise guidelines.

While I appreciate there are likely to be economies of scale in this area it would be helpful if registrants could be assured that these processes are running as efficiently as possible. I also note the consultation document refers to benefits for students of being registered with the Pharmaceutical Society NI, it would be helpful for registrants to understand what these benefits are, aside from eligibility for the pre-registration programme.

Q4. Do you regard the overall proposals for fee increases for 2016/2017 to be fair and reasonable?

Yes

No

Unsure

Further comments

This is fully discussed in my accompanying letter.

Q5. Do you regard it as reasonable and proper for the fees charged for registration and retention to be used to cover the general running costs of the Society and to ensure the performance of its statutory functions?

Yes

No

Unsure

Further comments

As discussed in my accompanying letter, given the differentials in fees, activity and performance of the Pharmaceutical Society NI and GPhC, I believe that registrants would welcome a review of internal processes, with the findings being shared with registrants, by the Pharmaceutical Society with any improvements in efficiency and governance implemented.

Q.6 Do you regard it as reasonable and fair that the retention fee and the registration fee are the same on the basis put forward by the Council that the general costs of the Society should be borne by all fully qualified registrants equally?

Yes

No

Unsure

Further comments

As previously discussed, this is wholly dependent on the fee level. If fees were set at a reasonable level such as the £250 retention fee of GPhC, then in that case CPNI could support the principle of one fee structure for fully qualified registrants, however given the current fee differential between regulators with further increases anticipated from the Pharmaceutical Society it would seem appropriate and fair to retain the legislative facility to accommodate lower fee bands,.

Q7. Do you regard it as reasonable and fair that there should be no distinction made, on the basis of age, to the fee charged to registrants for retention on the Register?

Yes

No

Unsure

Further comments

As previously discussed, this is wholly dependent on the fee level. If fees were set at a reasonable level such as the £250 retention fee of GPhC, then in that case CPNI could support the principle of one fee structure, however given the current fee differential between regulators with further increases anticipated from the Pharmaceutical Society it would seem appropriate and fair to accommodate lower fee bands, for pharmacists over 65 or 70 wishing to remain on the register, consequently CPNI believes the legislative facility for this should be retained.

Q.8 Do you regard it as reasonable and fair that there should be no distinction made, on the basis of location to the fee charged to registrants for retention on the Register?

Yes

No

Unsure

Further comments

As previously discussed.

Q.9 Do you regard it as reasonable and fair that the same fee structure should apply to all registrants seeking to be retained on the Register?

Yes

No

Unsure

Further comments

As previously discussed, this is wholly dependent on the fee level. If fees were set at a reasonable level such as the £250 retention fee of GPhC, then in that case CPNI could support the principle of one fee structure for fully qualified registrants, however given the current fee differential between regulators with further increases anticipated from the Pharmaceutical Society it would seem appropriate and fair to accommodate lower fee bands, as outlined, consequently the legislative facility for these should be retained.

Q10. Do you agree that the Council should amend the Pharmaceutical Society of Northern Ireland (General) Regulations (Northern Ireland) 1994 to revoke Regulation 4(2)(a) to remove the non-resident retention fee category?

Yes

No

Unsure

Further comments

As previously discussed, CPNI does not support this action given the upward trend in retention fees projected by Pharmaceutical Society NI. If fees were set at a reasonable level such as the £250 retention fee of GPhC, then CPNI could support the principle of one fee structure for fully qualified registrants, however given the current fee differential between regulators with further increases anticipated from the Pharmaceutical Society it would seem appropriate and fair to accommodate lower fee bands, such as those for non-residents who wish to remain on the register, consequently CPNI believes the legislative facility for these should be retained.

Q11. Do you agree that the Council should amend the Pharmaceutical Society of Northern Ireland (General) Regulations (Northern Ireland) 1994 to revoke Regulation 4(2)(b) to remove the over 65s retention fee category?

Yes

No

Unsure

Further comments

As previously discussed, CPNI does not support this action given the upward trend in retention fees projected by Pharmaceutical Society NI. If fees were set at a reasonable level such as the £250 retention fee of GPhC, then CPNI could support the principle of one fee structure for fully qualified registrants, however given the current fee differential between regulators with further increases anticipated from the Pharmaceutical Society it would seem appropriate and fair to accommodate lower fee bands, such as those for pharmacists over 65 who wish to remain on the register, consequently CPNI believes the legislative facility for these should be retained.

Q12. Do you agree that the Council should amend the Pharmaceutical Society of Northern Ireland (General) Regulations (Northern Ireland) 1994 to revoke Regulation 4(2)(c) to remove the 70s retention fee category?

Yes

No

Unsure

Further comments

As previously discussed, CPNI does not support this action given the upward trend in retention fees projected by Pharmaceutical Society NI. If fees were set at a reasonable level such as the £250 retention fee of GPhC, then CPNI could support the principle of one fee structure for fully qualified registrants, however given the current fee differential between regulators with further increases anticipated from the Pharmaceutical Society it would seem appropriate and fair to accommodate lower fee bands, such as those pharmacists over 70 who wish to remain on the register, consequently CPNI believes the legislative facility for these should be retained.

Q13. Do you regard it as reasonable and fair that students registering with the Society should pay a reduced registration fee for the reasons set out in this consultation document?

Yes No Unsure

Further comments

CPNI notes that GPhC do not “register” students as such, rather students pay a fee to enrol in their pre-registration scheme. While GPhC have agreed a student code of conduct and fitness to practise guidelines they also state:

“Most regulators do not have a system of undergraduate student registration in place. It is the Government’s view that education and training providers are ideally placed to identify and deal with student fitness to practise by carrying out pre-education checks to discover any factors which might either indicate prospective students’ unsuitability for training as a pharmacist or pharmacy technician, or which might identify areas where they may need extra support.”

Aside from enrolment in the pre-registration programme, it is unclear what benefits students receive from being registered with Pharmaceutical Society NI and as the Society does not have any regulatory function it would seem right and proper that the registration fee is substantially lower than that of fully qualified pharmacists.

CPNI reiterates that the cumulative Northern Ireland student fees are currently over 10% higher than those in GB, this would rise to 20% should the proposed increases be actioned, consequently CPNI does not support this increase.

Q.14. Do you regard it as reasonable and fair that the pre-registration examination fee should be set at a level broadly commensurate with the cost of holding that examination?

Yes

No

Unsure

Further comments

CPNI is of the opinion that, assuming Pharmaceutical Society NI pre-registration processes are found to be running efficiently, then the cumulative fees of student registration and the pre-registration examination should be set at a level broadly commensurate with the cost of enrolment and examination processes, we believe this to be consistent with the approach taken by GPhC.

Q. 15. Do you regard it as reasonable and fair that the repeat pre-registration examination fee should not exceed the fee for the substantive examination and remain consistent with it?

Yes No Unsure

Further comments

This is reasonable and is consistent with the approach taken by GPhC.