



**UNISON response to
the
consultation on the
draft 2011 fees rules
for the General
Pharmaceutical Council**

Introduction

- UNISON is the largest public sector union in health with 450,000 members employed across the service. We are pleased to have the opportunity of responding to the consultation on the draft 2011 fees rules. UNISON has over 2,500 pharmacy staff in membership, the vast majority of which are Pharmacy Technicians. In addition UNISON, by far the largest health service trade union has an extensive membership across the other health professions.
- As the largest trade union and the voice of the healthcare team, we are instrumental at influencing policy at regional, national and international level. We work with Government and other international unions to shape healthcare. In addition we work collaboratively with other trade unions on healthcare issues. UNISON has a long history of working with organisation and individuals who work and campaign in these areas of practise and care. UNISON works closely with each of the regulators to establish standards & policies in both patient care and education. We are a key stakeholder and value the opportunity in our collaborations to improve patient care
- As part of our consultation process, we have sought the views of our members, using a variety of methods including extensive feedback from our science, technical and therapy sector.
- UNISON welcomes this opportunity to respond to the GPhC consultation on setting fees. We hope that the General Pharmaceutical Council will take into account the weight of UNISON's views as a major stakeholder and the strength of feeling that our members have expressed regarding these proposals.

Executive Summary

- The Councils proposed annual registration fee charged to technicians of £142 is exorbitant especially when compared to the fees charged by other comparable regulators, such as the Health Professions Council and Nursing and Midwifery Council (£76).
- Members are deeply concerned that council gave no alternatives in the consultation outlining only a single figure.
- UNISON believes that whatever body is charged with regulating pharmacy technicians it should be able to properly function without charging more than other, comparable regulators.
- We would like the GPhC to reveal in greater detail how it reached the figure of £16.9 million needed to cover expenditure.
- We also would like the GPhC to commit to monitoring its reserve and reduce it if it is found to be larger than needed.

- UNISON believes that registration rates should be based on individual income in order not to discriminate against part-time and lower paid workers.
- There should be continuity between at least the GPhC and Health Professions Council on registration fees.
- With regard to setting fees for pharmacists and pharmacy technicians UNISON believes that basing the fee on the number of fitness to practice cases is flawed. We deem that the reason why a lower fee for technicians should be considered is because the salary of a technician is far lower than a pharmacist.

Question 1- Do you agree with the principle that the premises fees we set should cover the costs associated with the regulation of pharmacy premises?

- UNISON agrees that the premises fees should cover the costs associated with their regulation and pharmacists and pharmacy technicians registrants should not subsidise premises regulation.

Question 2- Do you agree with the proposed increase in premises fees which will enable us to apply a consistent approach to Controlled Drug monitoring in Great Britain?

- UNISON has no view on this question.

Question 3- Do you agree with our intention for the fees we set to be more closely related to the cost of the activity?

- UNISON would like the GPhC to reveal in greater detail how it reached the figure of £16.9 million needed to cover expenditure and we also would like the GPhC to commit to monitoring its reserve and reduce it if it is found to be larger than needed.
- UNISON members have rejected the proposals for the fee to be £142 for pharmacy technicians. There appears to have been no consideration as to the implication part time workers, nor to the plight of newly qualified or retiring members.
- The consultation document also refers to the cost of other professional regulation. Whilst we accept that there is a related link with some practitioners in the Health Professional Council, we do not accept that the same link can be justified with others, for example the salary of a pharmacy technician in comparison with a dentist. It is not consistent nor is there future earning power of the same magnitude.

- Council have given no indication on how secure they believe the estimate on the registration fees to be. There are no re-assurances offered in the consultation that there will not be increases for a period of time.
- UNISON also believes that there may be other ways of looking at the registration fees and applying it to earnings. Whilst such a system may be complex, it is deeply disappointing that council do not from this consultation appear to have considered it.

Question 4- Do you agree that we should not offer a low income fee?

- UNISON does not agree with the proposed actions of the GPhC. We are disappointed that the council decided not to extend the RPSGB practice of offering a low income fee for pharmacists to pharmacy technicians as well. The majority of pharmacy technicians are women and many are part time workers and they will be disproportional affected by this decision. UNISON feels that there have been no special measures considered for part timers, new or retiring registrants, many of whom will struggle to fund such an increase. UNISON would be pleased to participate in shaping any proposals in this area.

Question 5- Do you agree with the proposed additional fee for those pharmacy professionals who choose to pay by quarterly direct debit?

- UNISON does not agree with the proposed additional fee for those pharmacy professionals who chose to pay by quarterly direct debit. For a pharmacy technician, who is on a lower income, or who works part time, £142 is a large sum of money. Spreading the cost quarterly will help financially yet the GPhC is proposing to bring in a fee that would penalise those who need to spread the cost. This additional fee is in fact in contradiction to what many organisations carry out with regards to direct debit as they give a discount for paying by direct debit as the administrative costs are lower. UNISON is completely opposed to this additional fee.

Conclusions

- UNISON members have rejected calls for the registration fee to be £142 per year
- They are deeply concerned that council gave no alternatives in the consultation outlining only a single figure.
- UNISON opposes the additional cost associated with paying a quarterly direct debit.
 - UNISON is concerned that council have identified monies to cover the future shape of regulation, without knowing what it will be.
 - There should be continuity between at least the General Pharmaceutical Council and Health Professions Council on registration fees.

- UNISON does not believe that the GPhC has done enough to be able to justify and demonstrate such a large fee, double that of the NMC and HPC.
- There have been no special measures considered for those on low income including part timers, new or retiring registrants.