

Mr Edward Steele
Assistant Coroner
East Riding of Yorkshire and City of Kingston Upon Hull

[REDACTED]

1 September 2023

Dear Mr Steele

Regulation 28 Report to Prevent Future Deaths – Harold Wilberforce (Ref: 2023-0235)

Thank you for sharing the recent Regulation 28 Report relating to the death of Mr Harold Wilberforce. We are very sorry to hear about this and we would like to pass on our sincere condolences to Mr Wilberforce's family.

We note your concerns about a lack of clarity in respect of the roles and responsibilities of persons (such as delivery agents/drivers) attending upon the home addresses of elderly service users, particularly in the context of what action should be taken when someone is found to have fallen.

It may be helpful if I provide some background and context to our role as the independent regulator for pharmacy in Great Britain.

The GPhC has a statutory purpose to protect patients by setting and upholding the **standards for registered pharmacies** and the **standards for pharmacy professionals** to ensure that registered pharmacies are safe to provide services, and that pharmacy professionals are fit to practise. We also publish guidance and other good practice, to support pharmacy owners and pharmacy teams to meet our standards. In addition, we inspect pharmacies to make sure they are meeting our standards, and we investigate concerns about the people and pharmacies we register, taking proportionate action to protect the public.

Through our inspections, we look at a pharmacy's activity and the way it operates as well as the services it provides. When a registered pharmacy provides a delivery service, this is one aspect of the pharmacy services that we would look at and assess against the requirements of our standards for registered pharmacies.

When reviewing services that involve the transportation of medicines to a patient's home, we consider a number of different areas. This includes our **Inspection decision making framework**, the **Findings**

framework and our **guidance** for registered pharmacies providing pharmacy services at a distance, including on the internet.

One of the core requirements in our standards is for pharmacy owners to ensure that risks associated with the services they provide are identified and managed.

Inspectors will look at the systems and processes for secure delivery to people receiving care, for example, how medicines are transported and who provides the service. This includes looking at standard operating procedures (SOPs) and arrangements for indemnity insurance. They will also look at how pharmacy owners are assessing and managing risks, for example, risks associated with the suitability and timescale of the method of delivery or managing unexpected interruptions in delivery. Inspectors will also check the training provided to delivery agents/drivers and the pharmacy team. They will also usually ask about delivery arrangements and service level agreements with transportation providers.

We note your concerns about the actions of the delivery driver in this case and the pharmacy's lack of training for staff about what to do if a service user is found to have had a fall at their home address by a pharmacy delivery agent.

Delivery drivers themselves are not registered or directly regulated by us; nevertheless we have published **guidance to ensure a safe and effective pharmacy team** and we set **requirements for the training of unregistered staff** (which includes delivery drivers).

Our guidance states that pharmacy owners are responsible for making sure that the whole pharmacy team – both registered pharmacy professionals and all unregistered staff – provide safe and effective care and pharmacy services. Staff members, and anyone involved in providing pharmacy services, must be competent and empowered to safeguard the health, safety and wellbeing of patients and the public in all that they do.

Pharmacy owners are also accountable for making sure their unregistered staff meet our requirements for training. The scope of work of pharmacy support staff is hugely diverse, so we do not mandate specific detail about particular scenarios. We specify a set of learning outcomes which **all** support staff must achieve. These include outcomes relating to:

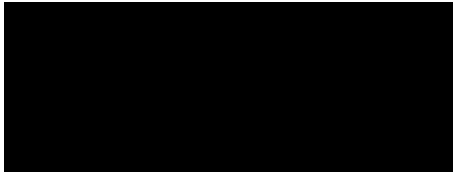
- Acting to maintain the interests of individuals and groups, making patients and their safety their first concern;
- Listening to and communicating effectively with users of pharmacy services;
- Recognising and raising concerns about safeguarding people, particularly children and vulnerable adults;
- Referring issues and/or individuals as appropriate to another member of the pharmacy team, other health and social care staff, organisations and services.

In this case, the Superintendent Pharmacist (SI) for the pharmacy has advised our inspector that all team members, including the delivery drivers, across the company had been made aware of the incident. The SI explained the SOPs had been updated to make it clear for the delivery drivers how to respond to an emergency which may arise when delivering medication. This included contacting the emergency services and informing the pharmacist on duty. The updated SOPs had been shared with all the delivery drivers and other team members across the company. The SI informed the inspector that all the drivers were enrolled on to a specific training course provided by an accredited pharmacy training provider and they were being supervised by the pharmacy managers across the company as they completed the training.

We will also remind our inspectors to make sure that they include, through our ongoing inspections, discussions about whether a pharmacy has SOPs in place to support delivery agents/drivers and wider teams to know what to do and who to contact if they find that a service user has had a fall or is at risk in other ways. The inspectors do currently routinely ask about how pharmacies ensure that children and vulnerable adults are safeguarded. This means that we can check if pharmacies are proactively considering how to manage the risks associated with these situations.

I hope this is helpful and please do not hesitate to get in touch if you need anything further at this stage.

Yours sincerely,

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Chief Executive