



Community Pharmacy
Cheshire and Wirral



Self-Declaration of Competence

You will be aware that, since the abolition of PCTs, there has been no single body who could accredit pharmacy professionals to deliver locally-commissioned services. This meant that the Harmonisation of Accreditation Group (HAG) process had to change to allow self-declaration. A similar group to HAG has been set up in the North West to develop self-declaration documents which are known as Declarations of Competence or DoCs.

Community Pharmacy Cheshire and Wirral vice chairman, Stephen, is the Chairman of the group developing DoCs and the LPC is therefore easily able to give feedback on the process. An increasing number of our commissioners are now using the self-declaration process on an increasing number of services. It is important therefore that you understand the process.

NB. The term pharmacy professional is used in the self-declaration process to refer to pharmacists and registered pharmacy technicians. Technicians may be allowed to undertake some services and this will be highlighted in the service specification/agreement. It does NOT mean that technicians can undertake all of the services that pharmacists can.

A number of questions have arisen regarding the DoCs process and we hope to answer them below:

1. Why has there been a change from accreditation to self-declaration?

PCTs used to develop services and then determine the training (usually via HAG) to allow pharmacists to deliver them. With the demise of PCTs the commissioning of local services was transferred to Local Authorities and CCGs. Many of these bodies had neither the knowledge nor the capacity to deliver training and accreditation. As a consequence, these local commissioners were looking for help to ensure that pharmacists were competent to deliver services. The group behind HAG recognised that this was an issue and began to look for a solution.

You'll know that to register to be able to deliver the NMS service you had to complete a self-declaration form. Because this precedent had been set the group explored whether a self-declaration process for locally-commissioned services would work. Feedback suggested that commissioners and pharmacists liked the idea and work began to develop the DoCs.

Community Pharmacy working together for patients across
Cheshire, Wirral and Warrington

2. Is the self-declaration process recognised by commissioners?

Yes. An increasing number of commissioners across the country (but particularly in the North West) are now stating that the use of the self-declaration process and the use of the DoCs is required to demonstrate competence. The roll-out of the process is therefore gathering pace.

3. Who else recognises the process?

Currently, the RPS, Pharmacy Voice, PSNC and APTUK formally recognise the process. Work is ongoing to gain national recognition from NHS England, Public Health England and Health Education England. The work is already recognised and works under the auspices of Health Education North West.

4. What do I have to do to declare myself competent?

It's important to bear in mind that you are making a professional declaration that you are competent to deliver the service. You should work through the questions (are you/ do you) in the DoCs paperwork. If you cannot answer any of the questions to your satisfaction (e.g. you do not understand the pharmacotherapy for the full range of emergency contraception and appropriate clinical guidance relating to these (e.g. NICE)?) then you should undertake some extra training.

To help you know where to look, each of the questions is mapped to a training source so, in the example above, this could be undertaken by completing either or both of the CPPE Contraception e-learning and assessment and/or open learning and assessment.

It's important to note that it is not compulsory to complete CPPE training. If your employer has provided training or you have received training from another source (e.g. a Pharma manufacturer) and provided that the training you've received still allows you to confidently answer the 'are you/do you' questions then you should write this onto the declaration form.

If you have been delivering the service for years to a consistent high standard then you may feel that you can quickly answer the majority of the questions. It's important to bear in mind that you do not need to complete CPPE packs (or other training) at each time you self-declare *unless you want to*.

Once you feel that you are confident to answer yes to all questions and have recorded the evidence then you will need to print and sign the declaration.

5. Do I need to attend a workshop?

Not necessarily. The point about self-declaration is that you are certifying that you are competent to deliver a service. If you feel the need to attend a workshop to, for example, refresh your consultation skills then that is your choice.

However, some commissioners may insist that a workshop is attended as part of the service specification/agreement and you should ensure that you are aware if this is the case.

6. Does the GPhC recognise the process?

The GPhC have had input in the process but, given the regulations that they work under, are unable to endorse the model. However, they recognise that the self-declaration process sits within both the Standards of Conduct, Ethics and Performance and the Standards for Registered Pharmacies.

The group working on the DoCs have been advised that the GPhC would view a false declaration by a pharmacy professional as a breach of the standards of Conduct, Ethics and Performance and therefore this would become a GPhC disciplinary matter.

NB. If you make a false declaration you may also find yourself in trouble with your employer as you will have assured them that you are competent when you are not and this could lead to disciplinary procedures.

7. Do I get a certificate?

When you print and sign the declaration form this, effectively, becomes your certificate.

8. What do I need to do with my declaration?

You should:

- Keep a copy for your own records
- Keep a copy securely in the pharmacy so that if you have a GPhC or commissioner inspection you will have a copy of the certificate to hand. We recommend keeping this in a file alongside copies of the service specification/ agreement and any other paperwork associated with the service.
- If you work for a multiple you should ensure that your employer is aware that you have signed the declaration. Each multiple will have a different process for doing this so you should check with your field team.
- If you are a locum then you should ensure that each owner that you work for is aware that you have signed the declaration for that service. This may involve sending a copy to the owner or leaving a copy in each pharmacy, for example.

9. How long does the declaration last for?

Most declarations last for 3 years (some declarations for services such as vaccinations only last a year) with the details stated on the DoC paperwork. If, during the 3 years, you feel that you need to complete further training then you should refer back to the DoC and review the competencies again – remember you are declaring that you are competent to deliver the service.

10. I employ pharmacy professionals (or contract locums) to deliver services, what do I need to do?

Contracts are now written so that the contractor needs to assure the commissioner that they have staff who are competent to deliver the service. Often this is a simple declaration on the part of the pharmacy contractor on a service level agreement. The pharmacy contractor, however, is likely to want to keep a copy of the self-declaration form that the pharmacy professional has completed as part of their clinical governance procedures. The self-declaration is a portable document so that the pharmacy professional only has to complete one declaration but can supply copies of the document to any or all of their employers.

Pharmacy Contractors will also need to make sure that they have a process in place to highlight when a new self-declaration is required because the current form has expired.

11. Where do I find out more information?

All the documentation relating to self-declaration is stored on the CPPE website. This includes a more detailed briefing document for pharmacy professionals which includes a 'What Good Looks Like' (WGLL) document embedded in it so that you can see the types of answer that are expected in response to each question. You can use this link

www.cppe.ac.uk/myservices

If you have any further detailed questions which cannot be resolved by reading the briefings on the CPPE website or the DoCs themselves then you can email Stephen at sthomas@rowlandspharmacy.co.uk or Lesley Grimes lesley@cppe.ac.uk