



Community Pharmacy Wales response to the Welsh Government's Welsh Language & Communications Committee request for advice on

**The National Health Service (Welsh Language in Primary Care Services)(Miscellaneous Amendments) (Wales) Regulations 2019**

Date 20 May 2019

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## Part 1: Introduction

Community Pharmacy Wales (CPW) represents community pharmacy on NHS matters and seeks to ensure that the best possible services, provided by pharmacy contractors in Wales, are available through NHS Wales. It is the body recognised by the Welsh Assembly Government in accordance with *Sections 83 and 85 National Health Service (Wales) Act 2006* as 'representative of persons providing pharmaceutical services'.

Community Pharmacy Wales is the only organisation that represents every community pharmacy in Wales. It works with Government and its agencies, such as local Health Boards, to protect and develop high quality community pharmacy based NHS services and to shape the community pharmacy contract and its associated regulations, in order to achieve the highest standards of public health and the best possible patient outcomes. CPW represents all 716 community pharmacies in Wales. Pharmacies are located in high streets, town centres and villages across Wales as well as in the major metropolitan centres and edge of town retail parks.

In addition to the dispensing of prescriptions, Welsh community pharmacies provide a broad range of patient services on behalf of NHS Wales. These face to face NHS Wales services, available from qualified pharmacists 6 and sometimes 7 days a week, include, Medicine Use Reviews, Emergency Contraception, Discharge Medicines Reviews, Smoking Cessation, Influenza Vaccination, Palliative Care Medicines Supply, Emergency Supply, Substance Misuse and the Common Ailments services.

CPW is relaxed about the requirements on the new Regulations relating to the use of the Welsh Language in Primary Care however it has some concerns over the way in which the Regulations have been drafted.

## Part 2: Observations on the proposed Regulations

CPW is fully supportive of the desire to improve the provision of primary care services to those citizens that use Welsh as their first language and to do so in a practical and deliverable manner.

With the diverse nature of community pharmacy ownership and the lack of direct management links with community pharmacy contractors, CPW is supportive of the proposed delivery mechanism where the requirements of the Regulations fall, in the main, on the health boards to implement and see this as a pragmatic way forward.

CPW is also content with the proposed requirements that will fall directly on the community pharmacy network in Wales from the draft Regulations and recognise them as a reasonable step in improving the use of Welsh in the provision of primary care services.

CPW would however not want to see any significant increase in requirements that fall on the network to provide services through the medium of Welsh, not only in relation to the practicality of delivery but also on the willingness of pharmacists to come to work in Wales. CPW is aware that concerns over not being able to speak Welsh have been stated as reasons why pharmacists and trainee pharmacists do not feel that they are able to work in Wales. Increasing this perceived barrier would negate the benefits derived from the Welsh Government's own *Train, Work, Live* campaign.

CPW does however have concerns about the way that the Regulations have been drafted and believe that the proposed Regulations may not achieve the required improvements.

The requirements in the Regulations fall on a NHS pharmacist delivering '*pharmaceutical services*'. The Regulations state that the definition of *pharmaceutical services* is as stated in regulation 2(1) of the 2013 Regulations. The 2013 Regulations are the *National Health Service (Pharmaceutical Services) (Wales) Regulations 2013*. In these Regulations it states that the definition of *pharmaceutical services* is '*pharmaceutical services that fall within section 80 of the 2006 Act and do not include directed services*'. CPW is of the opinion therefore that the requirements of the Regulations may only apply to the dispensing of prescriptions and the supply of medicines. CPW may not have interpreted the Regulations correctly and therefore CPW would recommend that the Committee seek clarification on this matter as the Regulations will only produce meaningful change if they cover the supply of medicines together with the provision of both NHS Advanced and Enhanced Services.

In relation to the dispensing of NHS prescriptions and the supply of medicines, CPW would wish to ensure that the provision of these services through the medium of Welsh only applies to the conversation between the pharmacist and the patient and not to the provision of patient information leaflets provided with the medicines or the labelling of prescribed medicines, as one would be totally impractical and the other would impact significantly on patient safety.

The Regulations as drafted require NHS Pharmacists to encourage appropriate people to attend health board training courses on Welsh language provision. CPW would recommend that, if this is to be successful, monies are made available to health boards so that pharmacy contractors can be reimbursed for the costs of attending any courses as CPW believe it is unreasonable for the cost of meeting these new regulatory requirements to fall on pharmacy contractors.

### Part 3: Conclusion

CPW agree that the content of this response can be made public.

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CPW welcomes communication in either English or Welsh.

For acknowledgement and further Contact:

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