

## Managing Pharmacy Performance Concerns

NHS England and NHS improvement are responsible for managing performance concerns.

Pharmacists are not on a performers list in the same way as Dentists or GP's but the body corporate (superintendents and directors), partnership or sole trader can be held to account for the clinical performance of their pharmacy as they are on the pharmaceutical list which is the pharmacy equivalent of a performers list.

NHS England and NHS Improvement can put conditions on the practitioner, which if not met could lead to removal from the pharmaceutical list.

There are three committees that manage the process at different stages, these committees and stages are explained below.

Contractors may ask for guidance or support from their LPC at any stage of the process.

### Concern Raised

Could come from a number of sources including the contracts team, patient complaints, CD Accountable Officer, CCG's and regulatory bodies. A case manager is allocated.



### First Committee – Professional Practitioner's Practice Review Group (3PRG)

The case manager will collate information which can include asking the pharmacy for a factual account.

If the original concern was a patient complaint or the incident is serious a pharmacy specific advisor will review the complaint and give a professional opinion on whether there is an outstanding performance concern.

3PRG will review cases weekly and make a risk assessment based on all information provided.

3PRG will then

- 1) Close the case or
- 2) Hand over to the contracts team for management
- 3) Refer the case to PAG
- 4) Urgently escalate the case for suspension



**Second Committee – Performance Advisory Group  
(PAG)**

PAG meets monthly to review cases. Decision makers include a lay member, an NHS England Chair, senior manager with patient safety responsibility and a pharmacist. They may ask the contractor to provide more information to the committee. A representative from the LPC can attend PAG.

PAG will then

- 1) Close the case
- 2) Ask the pharmacist advisor to visit the pharmacy to review progress or gain more information
- 3) Set remedial tasks
- 4) Refer to the PLDP



**Third Committee – Performers List Decision Panel  
(PLDP)**

PLDP meet every three weeks to review cases. Decision makers include a lay Chair, a senior manager with patient safety responsibilities, a pharmacist advisor and a decision maker acting on behalf of NHS England's Medical Director.

PLDP will then

- 1) Impose conditions on the contractor and refer back to PAG to monitor conditions imposed
- 2) Refer to the GPhC
- 3) Start the process to remove the pharmacy from the pharmaceutical list

## Notes:

The main concern of the process is to ensure patient safety.

The key test is to assess what an average member of the public would believe is proportionate to provide a safe service and take action to provide assurance.

Providing as much information as possible at the initial stage of the process can stop the case being escalated further.

If you're not sure what information is being asked for speak to the case manager.

Correctly recording and reporting patient safety incidents will allow you to have good records to refer to if necessary.

You can ask the LPC for guidance and support at any stage of the process – don't assume they have been informed.