

Witness Name: Duncan Rudkin

Statement No.: 1

Exhibits: DR/1 - INQ000221568 to DR/58 - INQ000221627

Dated: 15.09.2023

UK COVID-19 INQUIRY

WITNESS STATEMENT OF DUNCAN RUDKIN

I, Duncan Rudkin, will say as follows: -

1. I am the Chief Executive and Registrar of the General Pharmaceutical Council ("GPhC") and have been in this role since March 2010. I make this statement on behalf of the GPhC in relation to Module 3 of the UK Covid-19 Public Inquiry ("the Inquiry") Request for Evidence under Rule 9 of the Inquiry Rules.
2. The content of this statement is within my personal knowledge or, where it is not within my personal knowledge, I set out in this statement the source on which I rely in making this statement.
3. My statement relates primarily to activity between 1 March 2020 and 28 June 2022 ("the relevant period") for the purposes of the Inquiry and to matters which occurred within this date range, unless otherwise specified.

The role of the GPhC

4. The GPhC is the independent regulator for pharmacists, pharmacy technicians and registered pharmacy premises in Great Britain and is governed by the Pharmacy Order 2010 ("the Order").
5. Article 4 (3) of the Order sets out the principal functions of the GPhC which include:

- a. to establish and maintain a register of pharmacists and pharmacy technicians and premises where a retail pharmacy business is or is to be carried out;
 - b. to set and promote standards for the safe and effective practice of pharmacy at registered pharmacy premises;
 - c. to set requirements by reference to which registrants must demonstrate that their fitness to practise is not impaired;
 - d. to promote the safe and effective practice of pharmacy (including for example by reference to any code of conduct for, and ethics relating to, pharmacy);
 - e. to set standards and requirements in respect for the education, training, acquisition of experience and continuous professional development that is necessary for pharmacists and pharmacy technicians to achieve in order to be entered in the Register or to receive an annotation in the Register and to maintain competence; and
 - f. to ensure the continued fitness to practise of registrants.
6. Article 6 (1) of the Order states the GPhC's over-arching objective is the protection of the public. The pursuit of our over-arching objective involves pursuing the following objectives set out in article 6 (1A) (a – d) of the Order:
- a. to protect, promote and maintain the health, safety and wellbeing of the public;
 - b. to promote and maintain public confidence in the professions regulated under this Order;
 - c. to promote and maintain proper professional standards and conduct for members of those professions; and
 - d. to promote and maintain proper standards in relation to the carrying on of retail pharmacy businesses at registered pharmacies.

The registers maintained by the GPhC

7. The GPhC holds a register of pharmacists, pharmacy technicians and pharmacy premises in Great Britain. We publish this information as an online register, which

contains details of pharmacists, pharmacy technicians and pharmacy premises. It also includes current and historical fitness to practise information about individual pharmacists and pharmacy technicians, and enforcement information about registered pharmacy premises.

8. I have set out further information about temporary registration and provisional registration at paragraphs 28 to 44 below, as these were introduced specifically in response to issues arising from the COVID-19 pandemic during the relevant period.

The size of the register during the relevant period

9. The GPhC holds data on the number of registered pharmacy professionals (pharmacists and pharmacy technicians) who were eligible to work in Great Britain during the relevant period. The GPhC does not hold data on how many pharmacy professionals were actively working or which areas suffered any significantly greater reduction in the availability of community or hospital pharmacists or pharmacy technicians than other areas.
10. On 1 March 2020 there were 81,322 registered pharmacy professionals (57,630 pharmacists and 23,692 pharmacy technicians). By the end of the relevant period on 28 June 2022, there were 86,268 (61,131 pharmacists and 25,137 pharmacy technicians) or 86,706 including provisionally registered pharmacists.
11. There was a reduction in the number of pharmacists on the register between August 2020 and May 2021. The Government restrictions on social distancing and large gatherings implemented in March 2020 as a result of the COVID-19 pandemic resulted in the 2020 registration assessment dates (in June and September) being postponed.
12. To enable pre-registration trainees from the 2019/20 cohort to enter the pharmacy workforce, in May 2020, the GPhC Council approved a policy of provisional registration of pre-registration trainees as pharmacists, working under a series of restrictions related to scope of practise and supervision. Over 1,700 pre-

registration/foundation trainees were added to the register on a provisional basis from August 2020, but the numbers fluctuated during the relevant period after trainees sat the postponed registration assessment and joined the main register.

Collaboration with other stakeholders

13. During the relevant period, the GPhC collaborated with a wide range of stakeholders across the health and social care sector, as well as the pharmacy sector. This included the Governments across Great Britain and the relevant departments, the National Health Service (“NHS”), the Chief Pharmaceutical Officers, the Royal Pharmaceutical Society, Public Health agencies, other regulators and other pharmacy bodies, to help meet the challenge of the COVID-19 pandemic together.
14. The GPhC does not hold a list of every meeting or discussion with stakeholders during the relevant period, particularly as these were scheduled quickly, often at short notice and in response to the evolving and fast-moving external environment. In many cases, meetings or telephone calls happened weekly and helped to establish key areas of consensus and the major questions that needed to be resolved.
15. To give an illustrative example, as Chief Executive I regularly attended external meetings such as the COVID-19 primary care clinical stakeholder forum, which was set up to check and refine ideas that may be deployed as a part of the response to COVID-19. The forum comprised representatives from professional, representative and regulatory bodies across primary care, as well as senior representatives from NHS relevant organisations.

The impact of the pandemic on pharmacy

16. Through our regulatory work and discussions with stakeholders, the GPhC learned about the unprecedented impact of the COVID-19 pandemic on the pharmacy sector. Pharmacy professionals and teams, across different settings, stepped up and played a vital role in protecting the public. This was in the context of significant

challenges and pressures, including but not limited to staff shortages, winter pressures and supporting the roll out of new vaccination programmes.

17. The GPhC also heard worrying reports of pharmacy professionals and pharmacy teams working in a range of settings experiencing abuse and even violence from members of the public during this time.
18. In parallel, the GPhC worked quickly to ensure that pharmacy premises and pharmacy teams were operating to meet the needs of patients and the public. This included adopting and developing new policy and guidance, moving to a supportive approach to pharmacy inspections and regulating flexibly in response to the external challenges.

Initial preparations

19. At the outset of the COVID-19 pandemic in early 2020, the GPhC set up a corporate rapid response team within days, to ensure that intelligence collected from our pharmacy inspectors, our COVID-19 related Fitness to Practise concerns and enquiries to our Customer Contact Centre could be considered holistically and acted upon at corporate level.
20. This arrangement allowed for the development of rapid and consistent answers to the significant number of queries from the pharmacy sector. It also supported the publication of online Frequently Asked Questions, which were regularly updated and published to allow people to access this information easily. The intelligence gathered informed weekly conversations with different stakeholders across the system, which allowed us to highlight and share issues being picked up by the GPhC.
21. On 23 April 2020, the governing Council of the GPhC agreed an approach to manage and prioritise Council and Committee business during COVID-19. The Council is responsible for ensuring that the GPhC fulfils its statutory role to protect, promote and maintain the health, safety and wellbeing of members of the public by upholding standards and public trust in pharmacy. The Council has a

governance and assurance role, overseeing rather than carrying out the GPhC's regulatory work.

22. The Council also delegated its powers to the Chair of Council, in the event that it was not able to meet or was not quorate, by means of a formal resolution agreed at its meeting on 11 March 2020. This was another important governance step to help mitigate any risks or delays to decision-making in a fast-moving situation, to ensure appropriate prioritisation and continuation of work necessary to maintain statutory functions and protect the public.

Guidance issued by the GPhC during the COVID-19 pandemic

23. The GPhC issued regular guidance through a variety of different mechanisms during the COVID-19 pandemic. For the purpose of this statement, 'guidance' means any advice, information, policy or other statements issued or published by the GPhC in response to COVID-19 matters of relevance to this Inquiry. This includes press releases and other statements on our website and articles published in our online newsletter, Regulate.
24. Guidance was developed and formulated by a range of internal colleagues and teams, working collaboratively and across functions. This was signed-off or approved by our Senior Leadership Group, or by me as Chief Executive, or by our governing Council, as appropriate to the circumstances, our governance framework and taking account of the need for agile working in this period. Discussions and feedback from stakeholders as well as other insights, intelligence or information informed the development of guidance, where relevant.
25. In many cases, the guidance issued by the GPhC included links and references to relevant external advice from governments, the NHS and other bodies across Great Britain, as appropriate. This helped to raise awareness of official sources of information, across the three Countries that we regulate.
26. Below is an overview of the main guidance that we published, in different formats, during the relevant period. In some instances, this guidance was targeted at

specific groups such as pharmacy professionals, pharmacy owners or members of the public. I have indicated the target audience, where possible. However, all guidance, regardless of format, was published on our website and available for anyone to read.

- a. **Regulate article: latest updates on Coronavirus (COVID-19), dated 2 March 2020.** This asked pharmacy professionals to keep up to date with the latest information and advice on the novel coronavirus and to encourage their colleagues to do the same. It included links to sources of public health advice and guidance published by other organisations such as the Department of Health and Social Care, Public Health England, and Health Protection Scotland. A copy of the article is attached at exhibit DR/1 - INQ000221568.
- b. **Joint statement: How we will continue to regulate in light of novel coronavirus (COVID-19), dated 3 March 2020.** This was a joint statement with other statutory regulators of health and care professionals about how the GPhC would continue to regulate in light of novel coronavirus and recognised the vital role of health and care professionals in providing care in challenging situations. A copy of the statement is attached at exhibit DR/2 - INQ000221579.
- c. **Statement: GPhC changes approach to inspections of pharmacies in response to COVID-19 pandemic, dated 17 March 2020.** This confirmed that we wrote to all pharmacy professionals and pharmacy owners on 17 March 2020 to update them on our approach to regulation during the pandemic. At that point, we had stopped routine inspections of pharmacies and moved to a supportive phase, working differently with pharmacy owners and pharmacy teams. A copy of the statement is attached at exhibit DR/3 - INQ000221581. A copy of the email to all pharmacy professionals and pharmacy owners dated 17 March 2020 is attached at exhibit DR/4 - INQ000221582.

- d. **Joint Statement: Regulatory approach in challenging circumstances - GPhC and Pharmaceutical Society of Northern Ireland joint statement, 18 March 2020.** This reminded pharmacy professionals that in highly challenging circumstances they may need to depart from established procedures in order to care for patients and their families and provided advice on specific scenarios relevant to COVID-19. A copy of the statement is attached at exhibit DR/5 - INQ000221583.
- e. **Statement: Profiteering in difficult times, 19 March 2020.** This was published in response to reports of some instances of raised prices and locum rates during the COVID-19 pandemic and reminded pharmacy professionals that profiteering to take selfish advantage of the challenging situation, whether with prices of shortage products or locum rates, risked bringing the profession into disrepute. A copy of the statement is attached at exhibit DR/6 - INQ000221584.
- f. **Statement: Official sources of information on coronavirus, 19 March 2020.** This reminded pharmacy professionals about where to find official sources of advice and guidance and provided relevant links to external sources. A copy of the statement is attached at exhibit DR/7- INQ000221585.
- g. **Statement: COVID-19 pandemic, 20 March 2020.** This directed people to the GPhC's dedicated COVID-19 information page. A copy of the statement is attached at exhibit DR/8 - INQ000221586.
- h. **Statement: Postponement of 2020 revalidation submissions, 20 March 2020.** This confirmed that due to the challenges and pressures on the pharmacy sector, and the increasing number of cases of COVID-19, the GPhC postponed the revalidation submission date for those pharmacists and pharmacy technicians who were due to submit between 20 March and 31 August 2020. A copy of the statement is attached at exhibit DR/9 - INQ000221587.

- i. **Statement: Pharmacy closures during the Covid-19 pandemic, 23 March 2020.** This reminded the public that some pharmacies needed to adjust their opening hours or close for periods during the day to ensure that prescriptions were dispensed safely and that all staff were able to take necessary breaks. It also highlighted increasing numbers of reports about pharmacy staff experiencing abuse, disorder and even violence at the hands of some of the members of the public and condemned this as unacceptable. A copy of the statement is attached at exhibit DR/10 - INQ000221569.
- j. **Statement: Letter to trade associations on emergency situations, 27 March 2020.** This highlighted a letter from the GPhC to the Company Chemists Association, National Pharmacy Association and the Association of Independent Multiple Pharmacies following our previous joint statement with the PSNI on our regulatory approach in challenging circumstances, including the current COVID-19 pandemic. A copy of the statement is attached as exhibit DR/11 - INQ000221570. A copy of the letter is attached as exhibit DR/12- INQ000221571.
- k. **Statement: Covid-19: Social Distancing. Protecting yourself and your teams, 30 March 2020.** This highlighted a joint statement on the importance of social distancing during the COVID-19 pandemic, alongside the Royal Pharmaceutical Society, Association of Pharmacy Technicians UK, Pharmaceutical Society of Northern Ireland and Pharmacy Forum NI. A copy of the joint statement is attached as exhibit DR/13 - INQ000221572.
- l. **Statement: Examples of notable practice in pharmacy during the COVID-19 pandemic, 31 March 2020.** This highlighted examples of good and excellent practice by pharmacies on areas such as managing delivery services, supporting vulnerable patients and working effectively with other local organisations during the pandemic. A copy of the statement is attached at exhibit DR/14 - INQ000221573.

- m. **Statement: Update on new legislation relating to controlled drugs during the COVID-19 pandemic, 29 April 2020.** This provided an update on three temporary emergency measures introduced by the UK Government into legislation (The Misuse of Drugs (Coronavirus) (Amendments Relating to the Supply of Controlled Drugs During a Pandemic etc.) Regulations 2020). The statement highlighted Government advice that these amendments were enabling and would only be used in limited circumstances following an announcement by the Secretary of State and under conditions specified by the health service in the area(s) to which the announcement applied. A copy of the statement is attached at exhibit DR/15 - INQ000221574.
- n. **Statement: testing and tracing services across Great Britain, 8 June 2020.** This reminded pharmacy professionals and pharmacy teams to follow advice from governments and the NHS in each country and from the professional leadership bodies within pharmacy, specifically in relation to self-isolation and to review their business continuity plans and risk assessments. A copy of the statement is attached at exhibit DR/16 - INQ000221575.
- o. **Statement: Reviewing risk assessments during the COVID-19 pandemic, 19 June 2020.** This highlighted the findings of Public Health England's report on Disparities in the risk and outcomes of COVID-19 and the recommendations set out in the second part of that report on understanding the impact of COVID-19 on Black, Asian and Minority Ethnic (BAME) groups. It also reminded pharmacy owners of their important responsibility to identify and manage the risks associated with providing pharmacy services, to identify at-risk and vulnerable people. A copy of the statement is attached at exhibit DR/17 - INQ000221576.
- p. **Regulate article: Emergency legislation: provision for the supply of controlled drugs, dated 18 June 2020.** This further informed pharmacy professionals about three temporary emergency measures relating to

controlled drugs that were introduced by the UK Government into legislation at the end of April and provided additional information about these measures. A copy of the article is attached at exhibit DR/18 - INQ000221577.

- q. **Regulate article: Providing Safe Spaces in pharmacies for victims of domestic abuse, dated 18 June 2020.** This encouraged pharmacies across Great Britain to provide Safe Spaces for victims of domestic abuse, particularly during Covid-19 lockdown restrictions. A copy of the article is attached at exhibit DR/19 - INQ000221578.
- r. **Regulate article: Examples of good practice in registered pharmacies during the COVID-19 pandemic, dated 18 June 2020.** This highlighted how pharmacies and pharmacy professionals were adapting the way they worked to ensure that their patients continued to receive the care and medicines they needed and included good practice examples on topics such as governance, staff and pharmacy services, including medicines management. A copy of the article is attached at exhibit DR/20 - INQ000221580.
- s. **Statement: Joint letter with the Competition and Markets Authority: pricing during the COVID-19 pandemic, 29 June 2020.** This highlighted our joint letter to pharmacy owners and superintendent pharmacists in Great Britain regarding a minority of pharmacies that were seeking to benefit from the pandemic by charging unjustifiably high prices for essential products. A copy of the statement is attached at exhibit DR/21 - INQ000221588. A copy of the joint letter is attached at exhibit DR/22 - INQ000221589.
- t. **Statement: GPhC position on COVID-19 rapid antibody tests, 21 July 2020.** This highlighted our letter to all pharmacy owners and superintendent pharmacists about the provision and sale of COVID-19 rapid antibody tests from community pharmacies. This stated that in light of public health advice, the GPhC considered that it was not appropriate for them to be sold

in community pharmacies or recommended by pharmacy professionals at that point in time. A copy of the article is attached at exhibit DR/23 - INQ000221590. A copy of our letter dated 21 July 2021 is attached at exhibit DR/24 - INQ000221591.

- u. **Regulate article: Protecting patient safety when managing high demand for flu vaccinations and other services, dated 22 October 2020.** This provided advice to pharmacy professionals and pharmacy teams on how to manage and provide care in challenging circumstances, in line with regulatory standards. This also highlighted key resources from other relevant bodies across England, Scotland and Wales. A copy of the article is attached at exhibit DR/25 - INQ000221592.
- v. **Regulate article: “A Safe Space has saved my life”: how pharmacies are helping people find a way out of domestic abuse, dated 22 October 2022.** This highlighted how Safe Spaces in pharmacies were being used by people experiencing domestic abusive or other coercive or controlling behaviour during the relevant period. A copy of the article is attached at exhibit DR/26 - INQ000221593.
- w. **Regulate article: Reporting COVID-19 exposure in the workplace, dated 22 October 2020.** This reminded pharmacy employers to comply with health and safety reporting requirements and highlighted guidance from the Health and Safety Executive on the expectations and duties in relation to reporting cases of Covid-19 transmission in the workplace under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013. A copy of the article is attached at exhibit DR/27 - INQ000221594.
- x. **Statement: Supply of tests for COVID-19 from pharmacies, 16 November 2020.** This highlighted updated to our website Q&A page about the supply of different types of COVID-19 tests from pharmacies in Great Britain. This confirmed that it was not appropriate for community pharmacy pharmacies to sell or recommend rapid COVID-19 antibody test kits at that

point in time. This included Q&A online pages for pharmacy owners, pharmacy professionals and members of the public. A copy of the statement is attached at exhibit DR/28 - INQ000221595.

- y. **Statement: Supporting pharmacy professionals and teams through the second COVID-19 wave, 27 November 2020.** This highlighted our joint letter with the UK Chief Pharmaceutical Officers and the PSNI, which thanked everyone working in pharmacy for their remarkable work to reduce the impact of the COVID-19 crisis on the lives of our fellow citizens and their tireless efforts to support patients. A copy of the statement is attached at exhibit DR/29 - INQ000221596. A copy of the joint letter dated 26 November 2020 is attached at exhibit DR/30 - INQ000221597.
- z. **Statement: Understanding COVID-19 outcomes for ethnic minority healthcare workers, 7 December 2020.** This statement encouraged health professionals to take part in an urgent public health study, backed by the UK Government, to help understand why people from certain ethnic minorities were more likely to have severe COVID-19. A copy of the statement is attached at DR/31 - INQ000221598.
- aa. **Statement: COVID-19 vaccination programme: key information, 9 December 2020.** This highlighted our online guide for pharmacy professionals and pharmacy owners who wished to support the COVID-19 vaccination programme in England and signposted to key resources. The statement highlighted that updates from other countries would be included as relevant. This also highlighted our COVID-19 Q&A for patients and the public with answers to key questions about COVID-19 vaccinations and pharmacy. A copy of the statement is attached at exhibit DR/32 - INQ000221599.
- bb. **Regulate article: COVID-19 vaccination programme: key information, dated, 17 December 2020.** This referred pharmacy professionals and pharmacies to our online guide about the Covid-19 vaccination programme (which was updated throughout the relevant period) and provided

information about how to deliver vaccinations as an individual pharmacy professional, how to support the local Primary Care Networks to deliver vaccinations at or from a registered pharmacy, how to set up a temporary pharmacy in a larger setting in order to deliver vaccinations and other key links and resources about the vaccination programmes. A copy of the article is attached at exhibit DR/33 - INQ000221600. The online guidance referred to was updated throughout the relevant period.

cc. **Statement: Supporting pharmacy professionals throughout the COVID-19 pandemic, 21 January 2021.** This highlighted our joint letter with the UK Chief Pharmaceutical Officers and the PSNI, which thanked pharmacy colleagues for their work throughout the COVID-19 pandemic. This also highlighted that frontline pharmacy workers were among the high priority groups identified by the JCVI for receiving a vaccine. A copy of the statement is attached at exhibit DR/34 - INQ000221601. A copy of the joint letter dated 21 January 2021 is attached at exhibit DR/35 - INQ000221602.

dd. **Statement: All frontline pharmacy workers encouraged to get their COVID-19 vaccination, 4 February 2021.** This encouraged pharmacists and pharmacy technicians providing frontline healthcare services to get vaccinated at the earliest opportunity, and to encourage other members of their teams to do the same. A copy of the statement is attached at exhibit DR/36 - INQ000221603.

ee. **Statement: Update supply of COVID-19 tests from pharmacies, 15 February 2021.** This represented an update on our previous position on supplying different types of COVID-19 tests from pharmacies in Great Britain in light of developing guidance from the public health bodies. In light of the updated Public Health England guidance, we confirmed that we would no longer ask community pharmacies not to provide rapid/ point of care/ near-person antibody tests for COVID-19. Instead, we expected any pharmacy owner or pharmacy professional to carefully consider the Public health England guidance and other relevant guidance if deciding whether it was appropriate to offer this type of test, or other type of COVID-19 test,

and to carry out full risk assessments. A copy of the statement is attached at exhibit DR/37 - INQ000221604.

ff. **Regulate article: Running Covid-19 vaccination services, dated 25 May 2021.** This set out examples of notable practice in providing vaccination services as identified by our pharmacy inspectors, to support shared learning across the pharmacy sector. A copy of the statement is attached at exhibit DR/38 - INQ000221605.

gg. **Statement: Pharmacy owners' ongoing responsibilities for COVID-19 safety measures after 19 July, dated 13 July 2021.** This highlighted updated Government advice in relation to social distancing and wearing face masks in certain settings and reminded pharmacy owners to carefully consider the relevant guidance from governments, health and safety requirements and the GPhC's standards to help them to provide COVID-19 safe environments. In this statement, we also asked the public to continue to follow COVID-19 safety measures that remain in place in pharmacies to protect themselves, their communities and pharmacy staff. A copy of the statement is attached at exhibit DR/39 - INQ000221606.

hh. **Statement: Revalidation requirements from December 2021, dated 4 October 2021.** This confirmed that pharmacists and pharmacy technicians who were due to submit their revalidation records from December 2021 to February 2022 would only need to submit a reflective account on renewal. The GPhC extended changes to its revalidation requirements in recognition of the continuing pressures linked to the COVID-19 pandemic. A copy of the statement is attached at exhibit DR/40 - INQ000221607.

ii. **Statement: GPhC responds to Government announcement on mandatory COVID-19 vaccinations for NHS frontline staff, dated 10 November 2021.** This urged pharmacists and pharmacy technicians to get COVID-19 and flu vaccinations at the earliest opportunity, unless they were medically exempt, and asked them to encourage other members of their

team to get vaccinated. A copy of the statement is attached at exhibit DR/41 - INQ000221608.

jj. **Joint statement from the regulators of health and social care professionals, dated 8 December 2021.** This reiterated our support for staff working together to tackle the pandemic and seasonal pressure on services and confirmed that the context was understood and would be considered by regulators. This recognised that individuals on our register may feel anxious about how context is taken into account when concerns are raised about their decisions and actions in very challenging circumstances and that specific circumstances and factors relevant to the environment would be taken into account. A copy of the statement is attached at exhibit DR/42 - INQ000221609.

kk. **Statement: Revalidation requirements until May 2022, dated 22 December 2021.** This confirmed that the GPhC had extended changes to its revalidation requirements in recognition of the continuing pressures linked to the COVID-19 pandemic and in particular the Omicron variant until at least 1 June 2022. A copy of the statement is attached at exhibit DR/43 - INQ000221610.

ll. **Statement: Thank you message to pharmacy staff, dated 22 December 2021.** This statement thanked pharmacy teams and owners for their hard work in challenging times. It also highlighted the need for pharmacy owners to ensure infection prevention and control principles were followed at all times in the pharmacy, to help prevent transmission of COVID-19, keep staff safe and help minimise disruption to pharmacy services for the public. A copy of the statement is attached at exhibit DR/44 - INQ000221611.

mm. **Statement: GPhC responds to UK Government announcement on vaccinations for health and care staff, dated 1 February 2022.** This set out our response to the UK government's decision not to proceed with requiring vaccination as a condition of deployment for health and care staff providing CQC-regulated activities in England. This stated that the GPhC

would continue to underline the case for taking up COVID-19 vaccination in all pharmacy settings. A copy of the statement is attached at exhibit DR/45 - INQ000221612.

nn. **Statement: COVID-19 vaccination for pharmacy professionals, 11 February 2022.** This set out our position on pharmacy professionals being vaccinated against COVID-19. It reiterated that pharmacists and pharmacy technicians working in all settings across Great Britain should be vaccinated against COVID-19, unless they were medically exempt. A copy of the statement is attached at exhibit DR/46 - INQ000221613.

oo. **Regulate article: Covid-19 vaccination for pharmacy professionals, dated 16 February 2022.** This updated pharmacy professionals about the UK government's announcement on 31 January 2022 that it would not proceed with requiring vaccination as a condition of deployment for health and care staff providing CQC-regulated activities in England. Following the announcement, we reiterated our position on Covid-19 vaccination for pharmacy professionals in Great Britain. A copy of the article is attached at exhibit DR/47 - INQ000221614.

pp. **Regulate article: Panoramic study, help find effective early treatments for Covid-19, 17 February 2022.** This raised awareness about PANORAMIC – a UK-wide clinical study looking at new antiviral treatments for COVID-19, to help make sure everyone had the opportunity to take part in the trial. A copy of the article is attached at exhibit DR/48 - INQ000221615.

27. The GPhC also published guidance on temporary and provisional registration during the relevant period. This is set out in more detail below and follows the overview of our work in relation to these matters.

Temporary registration

28. The GPhC has powers under Articles 34 and 35 of the Pharmacy Order 2010 to temporarily register fit, proper and suitably experienced people to act as pharmacists and pharmacy technicians to help protect public health in the event of an emergency declared by the Secretary of State.
29. The temporary register was first set up in March 2020 after the Secretary of State for Health and Social Care wrote to the GPhC to advise that the UK was in an emergency situation, with the threat of loss of life and serious illness arising from the Covid-19 pandemic, and to confirm, as a result of the advice, that the GPhC was able to act under its temporary emergency powers.
30. The temporary register was set up to include all pharmacists and pharmacy technicians that had come off the register no more than three years previously, and without any fitness to practise issues. Those eligible for temporary registration, and that we could contact through the last email address we held on file, were given the option to opt-out before the register went live (this was later changed to an opt-in system from May 2020, so anyone who wanted to join the temporary register would email us to request this). The availability of existing legal powers meant that there were no specific legislative barriers to setting up the temporary register in this period.
31. On 19 March 2020, we issued a statement **"Protecting the public and supporting pharmacy professionals during the COVID-19 pandemic"**, to explain how those powers were being used and to ask individuals to determine whether they wished to work as a pharmacy professional during the emergency. The statement confirmed that those choosing to return to practise should only do so if they were fit to do so; considering their health, skills, knowledge, experience and personal circumstances. A copy of the statement is attached at exhibit DR/49 - INQ000221616. Around the same time in March 2020, we also produced guidance for employers on their responsibilities if they employed a pharmacy professional on the temporary register. A copy of the guidance is attached at exhibit DR/50 - INQ000221617.

32. On 27 March 2020, we issued a further statement **“Over 6000 former pharmacy professionals given temporary registration for COVID-19 emergency”**. This confirmed that on 27 March 2020, 3332 pharmacists and 2909 pharmacy technicians were given temporary registration, enabling them to return to work during the COVID-19 pandemic. A copy of the guidance is attached at exhibit DR/51 - INQ000221619.
33. In April 2020, we conducted a survey to help us understand how many pharmacy professionals on the temporary register would be working during the height of the pandemic, and what settings they were planning to work in. We received 1,309 responses to the survey (a 21% response rate). A copy of the report is attached at exhibit DR/52 - INQ000221620.
34. Two years later, on 16 March 2022, we issued a statement **“GPhC temporary register to close on 30 September”**. This was in response to the Government’s announcement that its intention was for the healthcare professions temporary registers, including the GPhC temporary register, to close on 30 September 2022. At that point, we invited those on the temporary register to consider applying to rejoin the main register if they wanted to continue practising after the end of September. A copy of the statement is attached at exhibit DR/53 - INQ000221622.
35. Later, on 26 September 2022, we issued a further statement **“Temporary register to remain open until 2024”**. This confirmed that the Secretary of State for Health and Social Care had asked the GPhC and the other relevant health professional regulators to keep our temporary registers for a further two years. We also wrote to all pharmacists and pharmacy technicians on our temporary register to let them know that it would remain open for the next two years and reminded them of the need to meet the Standards for Pharmacy Professionals and have the appropriate indemnity insurance in place, if they chose to practise while on the temporary register. A copy of the statement is attached at exhibit DR/54 - INQ000221623.
36. There were 27 concerns raised about those on the temporary register between 1 March 2020 and 28 June 2022 (25 unique registrants were identified from these concerns). By comparison, there were 2,281 unique concerns raised about those

on the main register in the same period (1,774 unique registrants were identified from these concerns.). There were 90,953 pharmacy professionals on the main register at any time during this relevant period and over 6,000 on the temporary register.

37. In terms of lessons learned and whether anything should have been carried out differently in respect of the temporary registers, I would highlight one specific point.

38. The temporary registers enabled additional pharmacy professionals to work during the pandemic if they chose to do so. On several occasions during this period, the GPhC raised the question about whether NHS communications were effective in signposting opportunities for deployment. Effective and clear communication about deployment opportunities across the system needs to happen alongside the operational and regulatory mechanisms, to make initiatives such as temporary registration as impactful as possible during a period of national emergency.

Provisional registration

39. As highlighted above, and in parallel to developments in relation to the temporary register, the GPhC also engaged in collaborative discussions with representatives from student and trainee representative bodies, universities, employers, education and training bodies and others from across the UK to discuss the key issues in relation to pre-registration training during the COVID-19 pandemic, particularly about the registration assessment. On 25 March 2020, we published a statement highlighting that during the pandemic trainees were not able to follow training plans or complete activities and objectives within their training plans and that they were concerned about whether the GPhC registration assessment would go ahead. We confirmed that we would provide updates as soon as possible and encouraged everyone to focus on the important role they were playing in supporting patients. We then issued a further joint statement with the Pharmaceutical Society of Northern Ireland on 26 March 2020. This confirmed our decision to postpone the registration assessments until later dates and that we would work quickly to develop plans for the interim period, including the possibility of a form of provisional registration for current pre-registration trainees. Copies of these statements are attached at exhibit DR/55 - INQ000221624 and exhibit DR/56 - INQ000221625.

40. On 21 May 2020, we published a statement “**Criteria for pharmacist provisional registration agreed**”. Provisional registration was introduced in response to the COVID-19 pandemic, which affected the ability of trainees completing the pharmacist pre-registration scheme in 2020 to finish their training as planned, and to sit the registration assessment as originally scheduled. A copy of the statement is attached at exhibit DR/57 - INQ000221626.
41. In terms of guiding principles, provisional registration was designed to maintain standards for entry to the register to protect patient safety and the quality of care given to patients and the public both now and over the long term; support the NHS and community pharmacy by strengthening the workforce at the critical time; minimise blockages or gaps in the pipeline for qualified new registrants to join the profession in 2020 and in coming years too; and, safeguard the welfare of students and trainees whilst also ensuring that their hard work, and that of their tutors, over many years was given suitable recognition at this key stage in their professional lives.
42. Provisional registration enabled people who had completed their training to support NHS services and provide patient care effectively as provisionally-registered pharmacists, while they waited to sit the registration assessment. Provisional registration was also implemented successfully by the GPhC outside of the relevant period in response to other issues related to the registration assessment. These were not directly related to the COVID-19 pandemic.
43. In January 2021, the GPhC commissioned Keele University to investigate the impact of the pandemic on pre-registration training and provisional registration from the perspectives of trainees, provisional registrants, and pre-registration tutors. The research included a series of semi-structured interviews, and the sample included a diversity of demographic characteristics and sectors of training. The final report highlighted a number of findings about the effect of the pandemic including patchy availability of personal protective equipment (PPE) in the early stage of the first wave; changes to training plans, linked to the use of PPE and social distancing restrictions; increased working hours in community placements linked to increased workload in that sector; cancellation of cross-certain training and training days; and, that many interactions (particularly within hospital pharmacy) moved online albeit tutor/tutee interactions remained regular and

robust. The report also found that pre-registration trainees did not report any significant effects of the pandemic on their confidence or outcomes. There were a number of recommendations for the GPhC, specifically around the best methods of communication with trainees and feedback on the future of the registration assessment. The full impact report is attached at exhibit DR/58 - INQ000221627.

44. The GPhC also worked collaboratively with other health and care regulators on issues relating to revalidation and registration in this period.

Recommendations to improve the response of the regulatory system in the event of a future pandemic

45. From the perspective of the GPhC, the main learning points for the wider system include:

- a. The value of agility and timely communication, to provide clarity and assurance, given the natural anxiety and uncertainty that professionals and the public feel during a pandemic or other crisis.
- b. The need for consistent approach, as far as possible, on major issues by organisations across the system, so that registrants and the public have clear and unambiguous answers to key questions. To give a specific example, the GPhC had to change its position on the provision of rapid/ point of care /near-person antibody tests for COVID-19 from community pharmacies at different times during the relevant period, in order to remain aligned with evolving Public Health England guidance.
- c. The importance of bringing together a wide range of stakeholders (virtually), to quickly establish key areas of consensus and the major questions that need to be resolved, particularly for any major policy or operational change.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false

statement in a document verified by a statement of truth without an honest belief of its truth.

Personal Data

Signed: _____

Dated: ____15.09.2023____