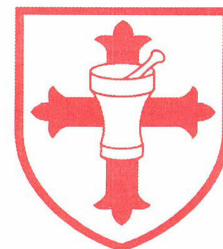

GHP

*Guild of
Healthcare
Pharmacists*



Mrs Diana Kenworthy
Floor 4D
Skipton House
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9th October 2008

Dear Diana

Department of Health Consultation: The Registration of Pharmacy Premises: Fees

Response from the Guild of Healthcare Pharmacists

Thank you for the opportunity to respond to this consultation. The Guild of Healthcare Pharmacists represents UK wide around 4,000 pharmacists including the majority of hospital pharmacists, pharmacists employed by Primary Care Trusts (PCTs) and pharmacists employed by other public bodies such as the Commission for Social Care Inspection and the Healthcare Commission. The Guild is part of the health sector of the union Unite-Amicus section.

We support the Royal Pharmaceutical Society's request for an increase in fees for registration of pharmacy premises of 13% for the annual retention fee to make it £183 and a 4.4% increase on the initial and restoration fees to make them £532.

The new regulator, the General Pharmaceutical Council, must not start to operate with a deficit on premises inspection cost recovery. The above rate of inflation rise in premises retention fees, will go some way towards this so we feel it is fully justified. Any deficit has to be made up from members' fees, and this falls heavily on the managed NHS pharmacists, as many community pharmacists have their fees paid by their employer. Although the NHS pharmacists, in common with other registered health care professionals, are getting £38 for 3 years towards their professional registration fees, provided they are below band 8b, this is now less than 10% of the annual registration fee and 8b an above get no help at all, even though many community pharmacists on similar salaries will get their fees paid.

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Inflation in July when the request was made was 4.4% and is probably set to rise further. This has to be taken into account.

The cost of petrol has risen steeply in the last year inspectors have to use their cars to visit premises during the course of their work.

Although we may have reservations about the previous handling of the pension scheme for RPSGB staff we understand the need to double the RPSGB contributions to keep the scheme alive.

In summary, we feel that the RPSGB request is reasonable and should be implemented.

We hope these comments are of assistance

Our reply may be made freely available.

Yours sincerely

Jean Curtis

Jean Curtis
Professional Secretary