

December 2023

Code of Conduct

Purpose

This Code of Conduct sets out the values and behaviours that Community Pharmacy England and Local Pharmaceutical Committees (LPCs) expect of their Committee members to best support their work and the long-term success of community pharmacy in England.

All Committee members are required to commit to these values and behaviours on accepting their role on the Committee and to demonstrate their commitment throughout their tenure. The Code operates within the context of the General Pharmaceutical Council (GPhC) professional standards, with which all GPhC members are expected to comply.

The Code of Conduct details arrangements to support the Values and Behaviours, and should be read in conjunction with the following:

- Constitution and Rules
- The Governance Framework
- Committee member role descriptions
- Policy and guidance for members covering confidentiality, conflicts of interest, Bribery Act and Competition Law Compliance

Values & Behaviours

The personal behaviour of all Committee members must be consistent with the following Values and Behaviours agreed by the Community Pharmacy England and LPC Committees.

Respectful – We:

- Are present and engaged in meetings
- Listen and enable all contributions to be heard and understood
- Value each other's contributions, recognising similarities and not judging differences
- Appreciate the broad range of pharmacy owners' business models, views and circumstances

Collaborative – We:

- Are generous with our own time and knowledge, participating fully and ensuring that the Committee is inclusive and makes best use of all members' skills and experience
- Work together as a Committee to make the tough decisions necessary for the overall best interest of community pharmacy
- Are curious and engage with a wide range of members, seeking their input and explaining the Committee's work
- Are open-minded, innovative, and willing to embrace change and new ways of working

Honest and open – We:

- Speak up, providing informed and evidence-based opinions, and say if we disagree in a constructive tone and manner
- Are open to changing our opinions and acknowledge mistakes or disappointing outcomes as a Committee
- Call out bad behaviour or breaches of our agreed ways of working
- Are accountable and as transparent as possible about the Committee's work and decisions, explaining our position and the basis for it, and setting out plans and reporting progress against them.

Integrity – We:

- Unite and take collective responsibility for all Committee decisions and adhere to agreed messaging
- Put the needs of community pharmacy as a whole first and above those of ourselves, our businesses and our own constituency
- Respect the confidential nature of all information
- Declare any relevant interests or circumstances including those that could (or could be perceived to) compromise the Committee's work
- Are committed to upholding the spirit of Seven Principles of Public Life (the Nolan Principles) (see Appendix)

Tenacious – We:

- Are assertive and ambitious, negotiating with authority and confidence to secure the best possible outcome for community pharmacy
- Plan for the future – building evidence and working strategically towards our goals
- Are resilient, focused on overcoming challenges and finding solutions, always seeking the right approach to achieve the best outcomes for community pharmacy

Supporting the Values & Behaviours

Committee members are expected to support the Values and Behaviours at all times. This includes living and demonstrating them personally, by encouraging and enabling others to do the same, and through facilitating, when necessary, the sanction mechanisms detailed below.

Examples of how Committee members can support the Values & Behaviours:

- Providing visibility of the Values and Behaviours as a collective reminder (in discussion, or on walls/screen at start of meetings)
- Reminding colleagues of the Values and Behaviours in meetings in advance of or during difficult discussions
- Being open about personal tensions and challenges, seeking advice and support from others
- Encouraging and contributing to feedback discussions about how well the Values and Behaviours are being demonstrated and suggesting opportunities to strengthen support for these
- Sharing the Code of Conduct with other key stakeholders to build understanding and awareness of the expectations of Committee members, including trade bodies and employers
- Highlighting and questioning (“calling out”) potential instances of non-compliance whether in a meeting or elsewhere (eg on social media), either:
 - Ideally at the time, if able to do so sensitively and respectfully and in accordance with the Values and Behaviours
 - In private later, again if able to do so sensitively and respectfully and in accordance with the Values and Behaviours
 - By seeking informal advice/support from another Committee member
 - For more serious matters, reporting to the Chair/Independent Chair (or the Vice Chair if the complaint concerns the Chair) who will make an initial assessment about whether to deal with the matter themselves, or to refer it for formal review and investigation.

Enforcing

The Committee takes any potential breaches of the Code seriously. Any instances of potential non-compliance with the Code of Conduct will be reviewed and investigated.

This responsibility has been delegated to the Governance Subcommittee. The Subcommittee determines the nature of the investigation required and how it should be undertaken. Its aim is to understand the circumstances and identify any action needed to enable the effective operation of Community Pharmacy England and LPCs in the long-term best interest of community pharmacy in England.

If following investigation, the Subcommittee concludes that there has been a breach of the Code of Conduct, it may determine:

- a) To give informal advice or support to the member
- b) To give a formal rebuke, which is reported in confidence to the Committee
- c) To recommend one of the following actions to the Committee for its consideration:
 - i. To give a formal, public rebuke
 - ii. To exclude the member from attendance at one or more meetings of the Community Pharmacy England/LPC Committee or its subcommittees (or other action appropriate to the breach) for a fixed period, while ensuring that the sanction avoids prejudicing the interests of pharmacy owners represented by the individual
 - iii. To exclude the member from the Committee; a new member would be appointed to their position and they would be ineligible to rejoin the Committee for a period of three years from the date of the determination.

Determinations made by the Subcommittee or Committee will be communicated in writing together with the reasons for the determination.

Any appeal regarding determinations a and b (above) would be considered by the Committee. There is no appeal in respect of determinations made by the Committee (c, above).

Adopted 1 April 2024

Review 2025

Appendix: Nolan Principles

- **Selflessness** – Holders of public office should act solely in terms of the public interest.
- **Integrity** – Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- **Objectivity** – Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- **Accountability** – Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- **Openness** – Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- **Honesty** – Holders of public office should be truthful
- **Leadership** – Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.