# Royal Pharmaceuticals Case Study

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The Royal Pharmaceutical Society of Great Britain (RPSGB) is a professional body for pharmacists and the regulatory body for pharmacists and pharmacy technicians in England, Scotland and Wales. The RPSGB investigates complaints and, in some cases, recommends criminal proceedings against pharmacists or pharmacy technicians.

The RPSGB is guided and controlled by a series of laws that regulate pharmacists and pharmacy technicians in England, Scotland and Wales, including: The Pharmacists and Pharmacy Technicians Order of 2007, The Medicines Act of 1968, The Poisons Act of 1972, the Shipman Inquiry of 2007, and The Pharmacy Order of 2009. While most complaints are either dismissed or handled by a RPSGB committee, some proceed to a Disciplinary Committee that relies on a legal (adversarial) court process that can impose criminal punishments. Thus, all aspects of a case need to be handled with care to assure that if the case does become a criminal case that everything done will conform with applicable legal requirements that require a carefully documented evidentiary trail and the protection of an accused rights.

### The Problem

In essence there are two types of processes that the RPSGB is concerned with. There are the generic management processes that the Secretariat undertakes and there is a specific process for dealing with a complaint. In previous automation efforts the RPSGB had created an Access database in which it tried to organize all the documentation resulting from responses to complaints. This approach provided relief for awhile but by 2006 the RPSGB felt that they were being overwhelmed by a growing number of complaints and by the associated problems in managing all the resulting paperwork.

In July the RPSGB decided they should launch an effort to introduce a new software system to help them manage their efforts. The team that was set up quickly decided that they did not really face an IT automation problem, but, instead, really faced a business problem. There was considerable disagreement about exactly what steps were to be followed and what documentation needed to be maintained. At the same time, there were things that were not being done at the moment that everyone agreed needed to be included in any process they defined and sanctioned. Thus the team quickly decided that the place to begin was to define exactly what they were doing, and consider how they might improve what they were doing before they considered how to automate their efforts.

### The Approach

As they became more sophisticated in thinking about defining and improving their processes, the team decided to use a process modeling tool – and ended up choosing Metastorm's process modeling product.

Figure 1 provides an overview of the processes that the RPSGB team decided to formalize.
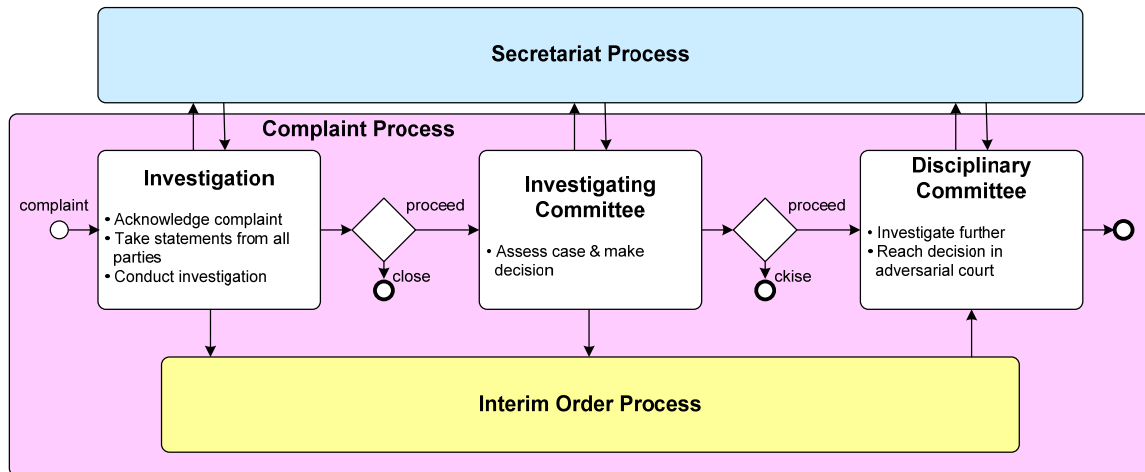
**Figure 1. An overview of the process to be managed**

All of the processes involved in managing the RPSGB and accepting and documenting its actions are included in the blue Secretariat Process.  The specific process that is set in action when a complaint was received is shown in pink.  A new process that could result in an immediate interim order to require or disallow some action is shown in the yellow box.  The older process for responding to complaints is shown in white boxes, although the team changed many specific steps within that flow.  The yellow process, on the other hand, is new, and a response to recent legislation that empowers the investigators and committees to issue immediate, interim orders in some cases to assure the public's safety.

The three core processes that constitute an investigation are triggered by a complaint.  This results in a case being defined and a team being assigned to investigate the complaint. Interviews are conducted and data is gathered.   Complaints can range from the trivial – when a customer thought a pharmacist was rude – to the serious – in which a pharmacist was drunk and delivered the wrong drug which then seriously harmed the patient.  In 2007 the RPSGB received 503 complaints. In some cases the complaint does not require further action and is dismissed.  In cases where the complaint does require action, after the investigation is complete the case is passed to the Investigating Committee which is empowered to negotiate with the accused and to reach certain conclusions and issue certain directives.  In most cases this resolves the complaint, the case is closed and the process is concluded.   In cases that are more serious, or where the accused refuses to cooperate with the Investigating Committee, the case is passed to a Disciplinary Committee that functions as a court, involves lawyers, and reaches a legal decision which may involve criminal penalties.

Once the process team had developed an overview, it proceeded to define the steps involved in each high-level process in considerable detail.  In each case they found it important to keep track of both the Secretariat and the Case processes to assure that they knew how they interacted. Thus, for example, complaints were originally submitted to the Secretariat which then took steps to define a case and assign a team to investigate.  The actual investigation of a specific case, on the other hand, fell in the Investigation process that was undertaken by the assigned case team. Figure 2 shows a diagram that covers the Secretariat and the Investigation process, showing the steps that occur within the Secretariat and then those undertaken by the case team.  Note that in this diagram the red boxes show the key processes in the flow and the boxes above or below the red boxes describe other steps that might occur at that time, depending on the nature of the specific case.
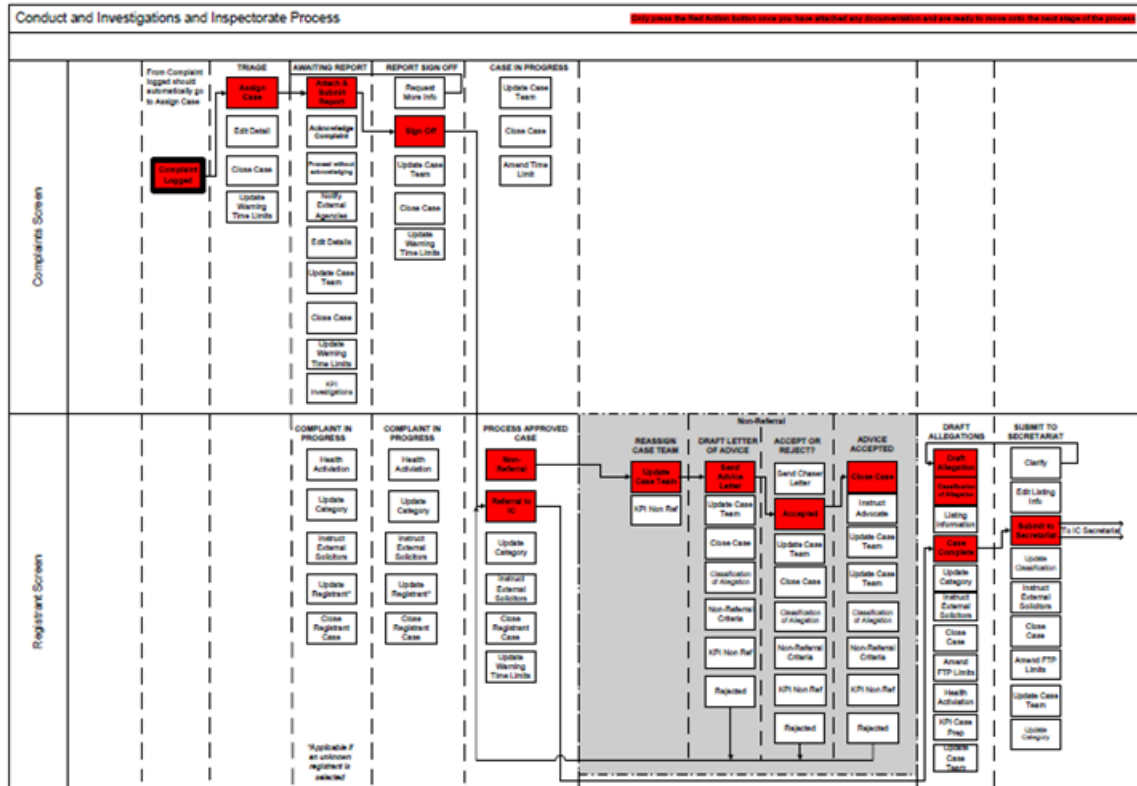
**Figure 2. Steps within the Secretariat and the Investigation processes.**

Eventually, once the BPM team had defined and improved their processes, they began to consider how to automate it. As the team had already built the in a process modeling environment and the organization was now conscious of their work as the implementation of a process, the team decided to use the Metastorm BPMS tool to manage the process and the data resulting from the process.

The team proceeded to define databases and to create interface screens so that users could use the workflow that they had defined as they redesigned the basic process.

The RPSGB team did not conceptualize their processes in terms of business rules, although a heavily legalistic process like theirs necessarily involved defining the decisions and the criteria to be used at each point along the way. It also depended on specifying things that investigators could and could not do at each step in the process to assure legal requirements were met.

An interesting example of how rules played a role in their process development effort occurred because the RPSGB was engaged in working with the government on new legislation that would further define the requirements placed on pharmacists and pharmacy technicians. Anticipating changes that would result in their processes, the team pulled out certain "rules" and set them up in a screen that managers could use to easily modify any of several items that they anticipated might change in the near future. Figure 3, for example, shows some of the items and shows how easy it would be for a manager to change the items. Any change would be automated incorporated in the process which would be adjusted as needed.

## SLAs

| | | |
|---|---|---|
| High Court Appeal can be lodged within | 28 | days of outcome completion |
| CHRE can be lodged within | 90 | days of outcome completion |

### DC SLAs

| | | |
|---|---|---|
| LQ must be served on registrant | 14 | days after the referral date. Send warning emails [ 7 ] days before this date |
| Initial time estimate must be provided | 28 | days after the referral date. Send warning emails [ 7 ] days before this date |
| Society case must be served | 210 | days after the referral date. Send warning emails first [ 90 ] days and then [ 28 ] days before this date |
| Registrant serves revised TE and completed LQ | 0 | days after society case served |
| Registrant serves case | 180 | days after Society case served (warning email will be sent if not received by this date) |
| Bundles must be served no later than | 14 | days before Monday of the hearing week. Send warning emails [ 7 ] days before this date |

### HC/Fast Track DC SLAs

| | | |
|---|---|---|
| LQ must be served on registrant | 14 | days after the referral date. Send warning emails [ 7 ] days before this date |
| Initial time estimate must be provided | 28 | days after the referral date. Send warning emails [ 7 ] days before this date |
| Society case must be served | 120 | days after the referral date. Send warning emails first [ 28 ] days and then [ 14 ] days before this date |
| Registrant serves revised TE and completed LQ | 0 | days after society case served |
| Registrant serves case | 120 | days after Society case served (warning email will be sent if not received by this date) |
| Bundles must be served no later than | 14 | days before Monday of the hearing week. Send warning emails [ 7 ] days before this date |

### Interim Order SLAs

| | | |
|---|---|---|
| Bundle must be served no later than | 14 | days before Monday of the hearing week. |
| Case documents must be served no later than | 7 | days before Monday of the hearing week. |

**Figure 3.  A series of rules that apply to cases set up so that specific requirements can be changed if the law changes.**

The Metastorm BPMS tool also allowed the process team to tailor aspects of the process to conform with legal rules about who could access what information and to provide users with online documentation that helped standardize terms.

## The Results

The initial project was launched in July of 2006 and finished in January of 2008.  From July 2006 to April 2007 the team focused on defining the project, analyzing their needs and selecting the tool.  The actual application was developed between April 2007 and January of 2008.

In May of 2008 the initial BPMS application was in place and working and the team set off on Version 2 of the application that incorporated the latest legal changes.  It went live in June of 2009.

When Andy Langer, the Assistant Director of Resources at the RPSGB discussed the effort he made several points.  First, he noted that developers should not assume that the people understood their existing process.  It took time to reach an agreement on what was or should be done.  And there was a considerable amount of discomfort with the idea that people would have to change the way they worked.  He stressed how important it was to assure that there was a complete buy-in from all levels of the organization.  This was made a little easier in this instance, because everyone knew that new legislation was coming and that it would require changes in procedures.

Mr. Langer went on to say that it was important not to think of an effort like this one as an IT project.  It's a business project and the key is getting the business to lead and to buy into what you are doing.  He suggested that you always organize one more meeting than you think you will

need to assure that all the requirements are captured and that all the problems or concerns are discussed.

The entire system is now online and this has helped the RPSGB reduce its dependency on paper and to make access to case data much more efficient.

A main goal of the project was to assure that 80% of the cases that are investigated are passed to the Investigating Committee within 3 months of the completion of the investigation. The project achieved this goal.  In addition, since the RPSGB application has been in operation the RPSGB has significantly reduced the number of investigations that remained incomplete beyond six months.

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