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PSNC Briefing 023/15: Providing pharmacy services at a distance

The General Pharmaceutical Council (GPhC) has issued guidance for registered pharmacies providing pharmacy services at a distance. This will apply to most community pharmacies, both distance selling and bricks and mortar, as many now provide collection and delivery of prescriptions as part of their dispensing process.

Services covered by the guidance

Whilst GPhC's guidance undoubtedly applies to NHS Distance Selling Pharmacies, it will also apply to most traditional pharmacies, due to parts of the dispensing process being carried out at a distance. For example, it would be relevant to the following non-exhaustive list of services:

- a pharmacy service where prescriptions are not handed in by patients but collected by pharmacy staff, or received by post or electronically – such as in the electronic prescription service (EPS);
- a delivery service from the registered pharmacy to patients in their own home or in a care home or nursing home;
- a collection and delivery service;
- a 'click and collect' service;
- a mail order service from a registered pharmacy;
- an internet pharmacy service, including ones linked to an online prescribing service whether or not the prescribing service is owned and operated by the pharmacy contractor;
- a 'hub and spoke' pharmacy service, where medicines are prepared, assembled, dispensed and labelled for individual patients against prescriptions at a central 'hub' registered pharmacy.

Details included in the guidance

It is recommended that all pharmacy contractors obtain a copy of the guidance. The GPhC allows pharmacies to not follow the guidance, but in those circumstances the pharmacy contractor would need to demonstrate how the pharmacy satisfies the Principles. The guidance can be downloaded using the link below:

[Guidance for registered pharmacies on distance and internet services](#)

A summary of some of the factors that may be particularly important to contractors follows. In all cases where clarification is needed, the GPhC should be contacted for advice.

Pharmacy contractors who provide services at a distance, including those listed above, are expected to carry out risk assessments for these activities and audit the services. Other key issues include providing patients with information they need so as to make informed decisions about the services they use, as well as ensuring patient information is held securely and in compliance with data protection legislation. Before providing any service at a distance the contractor must consider how the guidance will be followed and identify and manage any risks.

The guidance consists of the following five Principles:

Principle 1: The governance arrangements safeguard the health, safety and wellbeing of patients and the public.

Principle 2: Staff are empowered and competent to safeguard the health, safety and wellbeing of patients and the public.

Principle 3: The environment and condition of the premises from which pharmacy services are provided, and any associated premises, safeguard the health, safety and wellbeing of patients and the public.

Principle 4: The way in which pharmacy services, including the management of medicines and medical devices, are delivered safeguards the health, safety and wellbeing of patients and the public

Principle 5: The equipment and facilities used in the provision of pharmacy services safeguard the health, safety and wellbeing of patients and the public.

Following the guidance

The below points provide information on how pharmacy contractors are expected to follow the different aspects of the GPhC guidance.

Assessing the risks: Adherence to the guidance will require pharmacy contractors to carry out a risk assessment (involving relevant staff) before the service is provided at a distance in order to identify and manage risks. The risk assessment may be carried out across the contractor's business, but must also take account of the circumstances of individual pharmacies. The risk assessment should be reviewed regularly.

Auditing: The contractor needs also to carry out a regular audit of the pharmacy services to gather evidence that the pharmacy continues to provide safe services. If an audit identifies a problem the contractor should carry out a review of their services, and a review is also needed if there are changes to the NHS terms of service, other legislation or significant changes to the services provided.

Accountability: There should be clear lines of accountability, especially where parts of the pharmacy services are provided at different locations (e.g. home delivery of dispensed items or collection of prescriptions from a medical practice). If external contractors are used (for example couriers for delivery) due diligence checks are required of that contractor.

Record keeping: The pharmacy contractor should keep records where appropriate – the GPhC points out that records are not usually kept, for example, of sales of pharmacy medicines at the pharmacy, but if this service is provided at a distance, records may be needed to show that the services provided are safe. Recording and retention of records of patient consent for particular delivery methods may be needed.

Staff training: All staff should be properly trained and be competent to provide the services safely.

Location: All premises used for the purpose of providing pharmacy services must be fit for purpose and the pharmacy contractor must not mislead services users about the identity or location of the pharmacies involved in providing the services. Contractors have reported to PSNC that in response to mailshots, some patients have signed up for services provided by distance selling pharmacies, believing that they are the services offered by their local pharmacy. Contractors who promote their services should therefore take care that any promotional materials are clear as to the identity of the pharmacy and of its location.

Use of websites: Websites used for the sale of pharmacy medicines or used to provide dispensing services, must be associated with a registered pharmacy, and be secure. Websites must not be misleading. Pharmacy contractors who promote their services using a website are required to display a number of facts on their website, including their GPhC number, details of the registered pharmacy and information about how a person can check the registration status. During 2015 a new requirement to include a compulsory EU internet logo will be introduced, administered by the Medicines and Healthcare Products Regulatory Agency (MHRA). Pharmacy contractors with websites that are used to sell medicines should ensure they comply with this regulatory requirement once the MHRA has introduced the scheme.

Internet selling: Sales of medicines over the internet introduce different risks for pharmacy contractors, and the risk assessment should identify and manage these. For distance selling pharmacies the guidance specifically refers to the need to assess the suitability and timescale of the method of supply, dispatch and delivery of medicines, including controlled drugs and refrigerated medicines.

Supplying medicines: For all pharmacies that supply medicines where they do not see the patient face to face, there is a need to consider how staff can communicate any important information clearly and effectively.

Patient choice and consent: The guidance relating to Principle 4 (see above) aims to ensure that patients are given the right information to allow them to make their own choice of where they receive pharmacy services. If the pharmacy is associated with a prescribing service and orders prescriptions from a medical practice, collects prescriptions that have been issued, or the medical practice forwards prescriptions to the pharmacy, the pharmacy must ensure patients consent to the services the pharmacy is providing. The pharmacy will need to show that such arrangements with prescribers are transparent and do not cause conflicts of interest, restrict a patient's choice of pharmacy or unduly influence or mislead patients (whether deliberately or by mistake). Given the number of complaints PSNC receives about direction of prescriptions by prescribers, we recommend that all pharmacies review their arrangements for receiving prescriptions to ensure that patient's right to choose their pharmacy are not undermined.

Equipment use and contingency planning: Principle 5 (see above) covers matters such as the suitability of equipment and facilities used in the provision of services. Security of websites and electronic communications is covered, and pharmacies will be aware of many of the issues having completed their NHS IG toolkit.

If you have queries on this PSNC Briefing or you require more information please contact [Steve Lutener, Head of Regulation](mailto:Steve.Lutener@psnc.org.uk).