



Consultation on amendments to *Professional standards and guidance for the sale and supply of medicines* and *Professional standards and guidance for internet pharmacy services*:

Posting of medicines

Background

Currently, two of the seven professional standards and guidance documents, supporting the Code of Ethics for Pharmacists and Pharmacy Technicians contain sections relating to the posting and delivery of medicines. The two sections of the documents are:

- *Professional standards and guidance for the sale and supply of medicines*, Section 6: Delivery Services (see Appendix 1 below)
- *Professional standards and guidance for internet pharmacy services*, Section 7: Posting and Delivering Medicines (see Appendix 2 below)

The Society has been approached by a postal courier who has requested changes to three specific statements in the above professional standards and guidance documents.

- Take adequate steps to ensure that the delivery mechanism used is secure and that medicines are delivered to the intended user promptly, safely and in a condition appropriate for use.

The proposed amendment to this standard would remove the reference to an 'intended user'. Instead, alternative wording would be used to clarify that medicines can be delivered to a third person, as requested by the patient. The standard could also be amended to enable medicines to be posted through a letter box.

- Ensure the delivery mechanism used provides a verifiable audit trail for the medicines from the point at which it is handed to the patient, or carer, or returned to the pharmacy in the event of a delivery failure.

The proposed amendment to this standard would enable a medicine to be posted through a letter box and clarify that a medicine can be left with a third party who is not the patient, or their carer, at the request of the patient.

- Wherever possible a signature should be obtained to indicate safe receipt of medicines.

This is currently a good practice requirement of both these professional standards and guidance documents. It is proposed that this requirement should be changed to enable the use of other forms of technology to confirm the safe receipt of medicines, such as a GPRS tracking system. It is important that any amendment to this continues to allow a number of postal services to be used, and also takes account of alternative delivery mechanisms.

There are a number of pros and cons to enabling medicines to be posted through letter boxes.

Pros	Cons
- Increased access to medicines by patients who are unable to collect their medicines from a pharmacy	- Medicines could be more easily accessed by children and/or pets
- Patients are not restricted in having to stay at home to 'sign for' their medicines	- Communal postal areas could cause security issues.
- Increased convenience for the patient	- Reduced face to face contact with the patient
	- Potential for a medicine to be posted through the wrong letter box.

The Royal Pharmaceutical Society of Great Britain would like to hear your views on the questions set out in the questionnaire on these proposed amendments.

The questionnaire is available both online and as a pdf.

Completed questionnaire forms should be sent to Priya Sejpal, RPSGB, 1 Lambeth High Street London SE1 7JN (e-mail priya.sejpal@rpsgb.org), to arrive by **17 October 2008**.

Appendix 1

Professional standards and guidance for the sale and supply of medicines

6. DELIVERY SERVICES

STANDARDS

A delivery service is where the medicine is handed to the patient or their carer other than on registered pharmacy premises. When providing medicines via a delivery service you still have a professional responsibility to ensure that patients or their carers know how to use the medication safely, effectively and appropriately and check that they are not experiencing adverse effects or compliance difficulties. You must ensure that:

6.1 on each occasion a delivery service is provided you use your professional judgement to determine whether direct face-to-face contact with the patient or their carer is necessary.

6.2 you obtain consent from the patient to provide the delivery service and maintain appropriate records of requests for the service.

6.3 the delivery mechanism used:

- enables the medicine to be delivered securely and promptly to the intended recipient with any necessary information to enable safe and effective use of their medicine;
- caters for any special security/storage requirements of the medicine;
- incorporates a verifiable audit trail for the medicine from the point at which it leaves the pharmacy to the point at which it is handed to the patient or their carer, or returned to the pharmacy in the event of a delivery failure;
- safeguards confidential information about the medication that a patient is taking.

GOOD PRACTICE GUIDANCE

- Wherever possible a signature should be obtained to indicate safe receipt of the medicines.
- Systems should be in place to inform a patient who is not at home that delivery was attempted

Appendix 2

Professional standards and guidance for internet pharmacy services

7. POSTING AND DELIVERING MEDICINES

STANDARDS

Your responsibility towards your patients extends to the delivery of medicines. Medicines must be delivered safely and with appropriate instructions. When delivering medicines to a patient, whether by post or other means, you must:

7.1 take adequate steps to ensure that the delivery mechanism used is secure and that medicines are delivered to the intended user promptly, safely and in a condition appropriate for use.

7.2 medicines are packed, transported and delivered in such a way that their integrity, quality and effectiveness are preserved. Care must be exercised with thermolabile products.

7.3 ensure the delivery mechanism used provides a verifiable audit trail for the medicine from the point at which it leaves the pharmacy to the point at which it is handed to the patient or carer, or returned to the pharmacy in the event of a delivery failure.

7.4 ensure that delivery mechanisms safeguard confidential information about the medication a patient is taking.

GOOD PRACTICE GUIDANCE

- Wherever possible a signature should be obtained to indicate safe receipt of the medicines.
- Systems should be in place to inform a patient who is not at home that delivery was attempted