



**Royal
Pharmaceutical
Society**
of Great Britain

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Dear colleague

As the pharmacy profession will be aware the Responsible Pharmacist Regulations come into force on 1 October 2009 and includes within the responsible pharmacist requirements a replacement of the concept of 'personal control'.

One of the major issues that has come to the fore as pharmacists, superintendents and pharmacy owners have commenced their own personal and organisational planning in preparation for 1 October is: "What activities can take place in a registered pharmacy when a responsible pharmacist is not in charge of the premises, or when the responsible pharmacist is absent from the registered pharmacy premises?"

The guidance issued by the Society today has been developed in collaboration with the UK Health Departments and the Pharmaceutical Society of Northern Ireland (PSNI) and in accordance with the prevailing national or country specific legislation, and case law.

The new guidance clearly sets out a list of key relevant activities and clarifies whether they:

- 1) Require a responsible pharmacist to be in charge of the premises (s/he may be absent for up to two hours per day) and will need to take place under the supervision of a pharmacist and who will need to be present at the premises;
- 2) Require a responsible pharmacist to be in charge of the premises (s/he may be absent for up to two hours per day) and take place under the supervision of a pharmacist who may not need to be physically present at the premises;
- 3) Require a responsible pharmacist to be in charge of the premises (s/he may be absent for up to two hours) but does not require the supervision of a pharmacist;
- 4) Do not require a responsible pharmacist to be in charge of the premises but does require the pharmacy support staff undertaking the activity to be appropriately trained and for the activity to be done under standard operating procedures.

The guidance does not attempt to provide an exhaustive list of activities that a pharmacy may undertake and there is no substitute for reference to the law itself as to what the law says or how it applies in particular circumstances. However, the RPSGB hopes that this guidance will assist the profession in its final preparatory work and in the first weeks following the 1 October 2009.

In preparing this guidance it has been necessary to refer to case law, particularly that relating to supervision. As a result of the discussions between the Society, the Department of Health and other UK health departments it has been agreed that further work will be undertaken to review and if necessary clarify the Responsible Pharmacist Regulations. In doing so we will seek to future proof the regulations as far as possible. We are also aware of other changes in practice, for example the electronic transfer of prescriptions, which might necessitate a review of the guidance, as a result of NHS requirements.

Jeremy Holmes
Chief Executive & Registrar