

# Draft guidance for registered pharmacies providing internet and distance sale, supply or service provision

## A consultation report

### About this consultation

Between the dates of 17 September and 10 December 2014 we consulted on the GPhC's *Draft Guidance for registered pharmacies providing internet and distance sale, supply or service provision*.

The draft guidance describes the factors that should be considered before deciding whether any parts of a pharmacy service can be safely and effectively provided in a different way to the traditional manner normally found in a registered pharmacy. This guidance applies in all cases where one or more parts of the sale or supply of medicines or pharmacy services are provided over the internet or in other forms of distance service provision. In particular, it applies in all cases where the pharmacy staff providing any part of the service, and the patient, carer or member of the public receiving that service, are not both present together in the registered pharmacy.

The document should be read alongside the standards for registered pharmacies<sup>1</sup>, which aim to create and maintain the right environment, both organisational and physical, for the safe and effective practice of pharmacy. Following this guidance will help the pharmacy to:

- meet our standards, and
- provide assurances that the health, safety and wellbeing of patients and the public are safeguarded.

### How we consulted

The consultation was designed in the form of a questionnaire and was based on the Survey Monkey web platform<sup>2</sup>. The questionnaire was distributed in an electronic format only and consisted of questions divided in two parts:

- Background information on the respondents;
- Views on the *Draft Guidance for registered pharmacies providing internet and distance sale, supply or service provision*.

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<sup>1</sup> <http://pharmacyregulation.org/standards/standards-registered-pharmacies>

<sup>2</sup> A copy of the questionnaire is included as part of the Appendix to this report (Appendix 1).

## Using this report

This report summarises what we heard through the consultation process, by presenting some key statistics and drawing out some key themes that have been identified. It also includes our response to the issues raised and outlines the next steps in the development and implementation of the draft guidance for registered pharmacies providing internet and distance sale, supply or service provision.

We have taken a systematic approach to capturing feedback and ensuring we take full account of all responses. Responses to the quantitative (multiple choice) questions have been analysed and are presented throughout the report. All responses to the qualitative (open-ended) questions were considered and coded to identify themes.

Responses submitted by email which specifically addressed any of the quantitative questions have been included in the counts for that particular question. All responses have been included in the counts for the total number of individual and organisational respondents.

A list of the organisations which responded to this consultation is presented in the Appendix section of the report (Appendix 2).

As a result of the feedback received through the consultation process, we have made a number of changes to our guidance. These have been reflected in the 'our response' sections throughout this report, while the updated guidance was published in April 2015.

## Who we heard from

We received a total of 86 valid responses via Survey Monkey, 9 more responses via email, and one which was handed over to us in person. All responses that answered at least one of the core consultation questions (i.e. the questions asking for views on the guidance) were included in the analysis. Please note that the total number of responses is small and, where included, percentages are best read in conjunction with the total numbers.

<b>Total number of responses</b>	<b>96</b>
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## Background information

### Responding as an individual

Individual respondents	
Pharmacy professionals	53
<i>Of whom</i>	
<i>Pharmacists</i>	53
<i>Pharmacy technicians</i>	0
Members of the public	3
Other*	3



<b>Total individual respondents</b>		<b>59</b>
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\*The 'other' respondents included a patient and a contracts manager.

<b>Individual respondents – country of residence</b>	
England	47
Scotland	7
Wales	4
NI	0
Other / not specified	1
<b>Total individual respondents</b>	<b>59</b>

<b>Pharmacy professionals – settings</b>	
Community pharmacy	47
Pharmacy education, training and research	2
Hospital pharmacy	1
Primary care organisation / provider	1
Pharmaceutical industry	0
Other / not specified	1
<b>Total pharmacy professionals</b>	<b>52</b>

<b>Type of community pharmacy professionals worked in</b>	
Independent	43
Multiple	4
<b>Total working in community pharmacy</b>	<b>47</b>

<b>Community pharmacists – roles</b>	
Superintendent	21
Pharmacy owner	20
Employee / locum	6
Other / not specified	0
<b>Total working in community pharmacy</b>	<b>47</b>

<b>Whether their organisation currently provided any form of internet or distance sale, supply or service provision<sup>3</sup></b>	
No	35
Yes	10
No, not at the moment, but there are plans to do this	5
<b>Total respondents</b>	<b>50</b>

### Responding on behalf of an organisation

<b>Pharmacy / non pharmacy organisation</b>	
<i>Responding on behalf of</i>	
<i>A pharmacy organisation</i>	<b>30</b>
<i>A non-pharmacy organisation</i>	<b>3</b>
<b>Total respondents (org.)</b>	<b>37<sup>4</sup></b>

<b>Organisations – countries of operation</b>	
England	31

<sup>3</sup> Only respondents who indicated that they primarily worked in either “community pharmacy”, “hospital pharmacy”, “primary care organisation” or “other” were asked this question.

<sup>4</sup> Inconsistencies in the sum of responses are due to the fact that some organisations did not provide their name.

Scotland	9
Wales	6
NI	4
Other / not specified	4
<b>Total respondents (org.)</b>	<b>37<sup>5</sup></b>
<b>Organisations - sectors</b>	
Community pharmacy	21
Body/ organisation representing professionals / practitioners	5
Body/ organisation representing patients / the public	0
Body/ organisation representing trade/ industry	2
Government department/ organisation	1
Hospital pharmacy	0
Pharmacy education, training and research	0
Pharmaceutical industry	0
Primary care organisation / provider	0
Regulatory body	1
Other / not specified	7
<b>Total respondents (org.)</b>	<b>37</b>

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<sup>5</sup> Inconsistencies in the sum of responses are due to the fact that some organisations operated in the whole of Great Britain or the whole of the UK. The multiple choice question allowed for selection of multiple answers.

<b>Type of community pharmacy represented</b>	
Independent	16
Multiple	5
<b>Total responding on behalf of community pharmacy</b>	<b>21</b>

<b>Roles of those responding on behalf of community pharmacy</b>	
Superintendent	12
Other / not specified	4
Pharmacy owner	3
Employee / locum	1
<b>Total responding on behalf of community pharmacy</b>	<b>20</b>

<b>Whether their organisation currently provided any form of internet or distance sale, supply or service provision<sup>6</sup></b>	
Yes	14
No	7
No, not at the moment, but there are plans to do this	2
<b>Total respondents</b>	<b>23</b>

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<sup>6</sup> Only respondents who indicated that they primarily worked for either “community pharmacy”, “hospital pharmacy”, “primary care organisation” or “other” were asked this question.

## Views on the guidance

### What we heard

<b>Q. 1</b> Guidance under Principle 1: The governance arrangements safeguard the health, safety and wellbeing of patients and the public. <b>Do the areas listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?</b>		
Yes	43	49%
No	25	28%
Not sure	20	23%
<b>Total N of responses</b>	<b>88</b>	<b>100%</b>

Nearly a half of respondents (49%) thought that the guidance under Principle 1 provided sufficient clarity for pharmacies providing internet and distance sale, supply or service provision. Just over a quarter of respondents (28%) thought the guidance under this principle was not sufficiently clear.

#### **Q.2 Is there anything else that is relevant that should be covered? Do you have any suggestions for improvements to this section?**

One of the main areas where respondents requested further clarification was on the supervision, sale and supply of medicines.

Respondents asked questions about the meaning of 'sale and supply' specifically in this context, as the entire process was seen to be more dispersed than in 'traditional' community pharmacies and can take place at several different locations. Some respondents raised concerns about how clinical assessments and Pharmacy medicines sales could be made effectively on the internet.

Further clarity was also requested with regards to the lines of accountability and where responsibility lies, particularly as there are multiple parties involved in the process of sale and supply, including third parties such as delivery companies, and also where responsibility lies between the responsible pharmacist and the superintendent.

#### **Our response**

The law is clear in relation to the sale and supply of Pharmacy (P) and Prescription Only Medicines (POM) medicines at or from a registered pharmacy. We clarified in the guidance the legal requirements on the sale and supply of P and POM medicines, making it clearer how the law applies in relation to pharmacy services being provided at a distance.

The pharmacy owner and the superintendent pharmacist, are responsible for making sure that our standards for registered pharmacies are met. We make it clear that it is also the owner and superintendent who is responsible for making sure the guidance is followed. We have not duplicated information which is already in our standards.

## Other comments

Concerns were expressed about internet pharmacy as a whole and the potential for damaging community pharmacy networks, as respondents considered internet pharmacy more risky because there is no face to face contact. Some respondents were not in favour of internet pharmacies at all, believing it would change the face of community pharmacy.

Our consultation highlighted that some respondents perceived that registered pharmacies providing pharmacy services on the internet were subject to different standards and inspections. Some respondents wanted further clarification on how the GPhC standards would be enforced and how internet & distance selling pharmacies would be inspected.

Some respondents felt there was an increased burden required to keep extra records for certain sales of medicines at a distance, other respondents questioned how the NHS contracts for distance selling were monitored and a number of respondents requested more detailed guidance and templates, for example to help with risk assessment.

Comments regarding conflicts of interest and patient choice were raised under this principle as well as in principle 4. We have discussed the comments together under Principle 4.

## Our response

Pharmacy owners and superintendents must ensure that all services protect the safety and wellbeing of those who use registered pharmacies, irrespective of how the service is provided: in the local community, at a distance, on the internet, or by any other means.

We are aware that pharmacy is changing, and when providing any pharmacy service, patients and those who use pharmacy services must be our first concern. In general there appears to be a lack of understanding of how pharmacy services provided at a distance, including on the internet, operate. Regardless of how the pharmacy service is delivered, the same legal requirements, regulatory standards and inspections apply to all registered pharmacies. The sale and supply of P and POM medicines must only happen at or from a registered pharmacy under the supervision of a pharmacist.

Many of the responses reflected concerns, or raised questions about government policies in relation to distance selling or internet pharmacies about which it would be inappropriate for the GPhC to comment on. We emphasize in the guidance that registered pharmacies providing pharmacy services at a distance, including on the internet, must comply with the same standards as any registered pharmacy and will be inspected against the same standards as all registered pharmacy, taking into account the different risks.

We do not intend our guidance to be burdensome. Many of the records are automatically generated for certain transactions on the internet, so it would not require more deliberate record keeping, but will be a good evidence base for the decisions made regarding whether or not to make the sale of a medicine on the internet.

We are aware that the guidance will need to be reviewed if there are changes in the law as a result of the Department of Health's Rebalancing programme<sup>7</sup>.

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<sup>7</sup> <https://www.gov.uk/government/groups/pharmacy-regulation-programme-board>





It is our view that other organisations such as the professional leadership bodies and other pharmacy organisations are best able to provide support materials such as templates for risk assessments and more detailed guidance. Also organisations such as NHS England would be the appropriate body for further guidance on how the NHS distance selling contract is monitored.

The title has been changed to better reflect the content, and will now be known as *Guidance for registered pharmacies providing pharmacy services at a distance, including on the internet*.

## What we heard

**Q. 3** Guidance under Principle 2: Staff are empowered and competent to safeguard the health, safety and wellbeing of patients and the public.

**Does the area listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?**

Yes	46	59%
No	20	26%
Not sure	12	15%
<b>Total N of responses</b>	<b>78</b>	<b>100%</b>

The majority of respondents (59%) thought that the guidance under Principle 2 provided sufficient clarity. However, around a quarter of respondents (26%) did not think that this was the case.

**Q.4 Is there anything else that is relevant that should be covered? Do you have any suggestions for improvements to this section?**

Some respondents requested further clarification on the term 'staff' acknowledging the variety of people involved. It was pointed out that there are both those directly managed by a pharmacist as well as those who are not, such as those responsible for delivery.

There were also some suggestions that the guidance would be a good opportunity to ensure that there are appropriate staffing levels in relation to the volumes processed by a pharmacy.

Overwhelmingly, respondents recognised the importance of suitably qualified staff, but requested further guidance on the type of training required.

### Our response

We clarified the term staff in the 'About this guidance' section, to include employees and any third party who helps provide any part of the pharmacy service. We are aware that staff and skills mix are important factors when considering a particular service, which are relevant to our standards. However, staffing levels are covered under the NHS contract.

It would be for other pharmacy organisations to provide further resources on these issues and we have referenced some of these organisations in our guidance.

## What we heard

<b>Q. 5</b> Guidance under 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.		
<b>Do the areas listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?</b>		
Yes	42	54%
No	16	21%
Not sure	20	26%
<b>Total N of responses</b>	<b>78</b>	<b>100%</b>

Over a half of respondents (54%) thought that the areas covered under Principle 3 in the guidance provided sufficient clarity to pharmacies providing internet and distance sale, supply or service provision. Around a fifth of respondents (21%), however, held the opposite view.

### **Q.6 Is there anything else that is relevant that should be covered? Do you have any suggestions for improvements to this section?**

Some respondents raised questions about the ‘ownership’ of the website referred to in the guidance, as it was felt this did not appropriately take into account that pharmacies might be buying a service from other providers, rather than owning it themselves.

Overall, respondents welcomed a logo which would help identify legitimate internet pharmacies.

The location of services was discussed in this section by respondents, as well as under Principle 4. We have therefore discussed it in more detail under Principle 4.

### **Our response**

We covered the pharmacy website in this section, rather than under the section concerned with Principle 5, as it is the first point of access for patients and service users of pharmacy services on the internet. This is equivalent to the physical environment of the pharmacy that patients first encounter when they walk into a pharmacy. We clarified the section on the website to make it clear that the website could be associated with a registered pharmacy, as well as being owned by the pharmacy.

We worked with and supported the MHRA on the implementation of the EU logo; however the MHRA remains the authority responsible for administering it across all businesses required to display it. We are of the opinion that it must be clear to the public and users of pharmacy services as to the different levels of assurance and



regulation between pharmacies, including those supplying medicines on the internet and other retail organisations not registered with the GPhC.

We will consider how the EU logo will impact our voluntary internet logo when the MHRA have determined their proposals for implementation. Whilst we have an online voluntary logo, our key message to patients or people who use pharmacy services on the internet, is that if they are unsure a pharmacy is registered, they should check our online register.

## What we heard

**Q. 7** Guidance under 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.

**Do the areas listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?**

Yes	36	49%
No	28	38%
Not sure	10	14%
<b>Total N of responses</b>	<b>74</b>	<b>100%</b>

Nearly a half of respondents (49%) believed that the guidance under Principle 4 provided sufficient clarity. Nearly 38%, disagreed.

**Q.8** Is there anything else that is relevant that should be covered? Do you have any suggestions for improvements to this section?

### Patient choice and location of the service

Patient choice and location of the service arose as a topic that respondents raised under this principle as well as under Principle 1 and 3.

Respondents felt that pharmacies should be explicit about different parts of the services taking place in different locations and possibly delivered by different organisations. They felt that patients should have full knowledge of what service was carried out, by whom and from where, and not be misled about the location, as this could have a possible impact on delivery times. Some suggested that patients should explicitly consent to this, whilst others thought this might be too onerous to all parties concerned.

### Our response

Patients should be made aware of where pharmacy services will be provided from. They must be able to exercise choice in deciding where they receive their pharmacy services from. We strengthened this section of our

guidance to ensure that pharmacy owners and superintendents are aware that patients should not be unduly influenced or misled, either deliberately or by mistake.

### **Conflicts of interest**

Respondents felt that conflicts of interest such as prescription direction, were specific to these types of services, and could arise from prescribing services or practices automatically directing patients using the electronic prescription service to certain pharmacies, thus limiting patient choice. These were seen as problematic because they are not transparent and limit patient choice.

### **Our response**

We have made it clear that pharmacy professionals must make sure that patients consent to any pharmacy service provided when a pharmacy is associated with a prescribing service. The electronic prescription service (EPS) is an NHS service and patients have to nominate the pharmacy of their choice where they want to have their medicines supplied.

We published a **joint statement** on supporting patients in making informed decisions in November 2015.

### **Other comments**

The safety of deliveries and how this can be ensured was a concern to some respondents and it was requested that this should be addressed more directly. The comments were two-fold: there were concerns about how to ensure the safety of a delivery chain overall, with multiple parties, including external delivery companies, being involved; and, about who was responsible for each part of the delivery. Some responses identified maintaining fridge lines as a particular issue, as well as controlled drugs, and requested more guidance on this.

Throughout the consultation, some expressed a more general unease with these new forms of service delivery – there appeared to be a feeling that internet and distance selling pharmacies are inherently problematic, with the perceived difficulty of controlling the sale of P medicines online, the risk arising from the lack of face to face contact, and the difficulty of online clinical assessment cited as examples. Responses implied that these problems are specific to internet and distance selling pharmacies.

Another topic identified was information provision and that patients should have all the relevant information and know how to contact the pharmacy if they have additional questions about their medicine.

### **Our response**

Again, a number of comments were raised about public policy in relation to internet pharmacies which are a matter for government to address. We have included CDs and fridge lines as examples of risks that need to be managed when considering delivery methods under Principle 1 of the guidance. We have signposted to other reference sources regarding the delivery of medicines from other pharmacy bodies.

## **What we heard**

**Q. 9** Guidance under Principle 5: The equipment and facilities used in the provision of pharmacy services safeguard the health, safety and wellbeing of patients and the public.

**Does the area listed above provide sufficient clarity for pharmacies providing internet and**



<b>distance sale, supply or service provision?</b>		
Yes	47	63%
No	13	17%
Not sure	15	20%
<b>Total N of responses</b>	<b>75</b>	<b>100%</b>

Almost two-thirds of respondents (63%) believed that the guidance under Principle 5 provided sufficient clarity for those involved in providing internet and distance sale, supply or service provision.

**Q.10 Is there anything else that is relevant that should be covered? Do you have any suggestions for improvements to this section?**

There were few comments in this section. Two respondents mainly noted that the ‘website’ should be covered here, rather than under principle 3 which dealt with premises. There were also calls for explicitly requiring software to be up to date and pharmacies having business contingency plans in case back up was needed.

**Our response**

Whilst the website was considered to be part of the computer/remote device (equipment) by some, our opinion is that, similar to a shop window, it is the first place accessed by patients and service users.

We have now included that pharmacies should have adequate backup and business continuity plans (under Principle 1 - risk assessment) and that the software should be up to date.

**What next?**

Thank you for responding to our consultation. Your responses have informed the changes we have made to the guidance. We value your comments and have tried to address as many of your points as we could. We will continue to monitor new models of pharmacy services provided at a distance and ensure that our guidance is regularly reviewed to take account of this.

We will also consider the future of our voluntary logo, once the MHRA EU logo has been implemented and is well established (see Principle 3).

We will also have to consider the implications of the survey on the implementation of Council of Europe Committee of Ministers **Resolution ResAP (2007)2** on good practices for distributing medicines via mail order.

## Appendix 1: Consultation questionnaire

### Part 1: Background information

**Q.:** In what capacity are you responding?

- As an individual – **Section A**
- On behalf of an organisation - **Section B**

#### Section A – Responding as an individual

**Q.:** Please provide your contact details:

Your name:

Job Title:

Address:

Email :

Contact tel:

**Q.:** What is your country of residence?

- England
- Scotland
- Wales
- Northern Ireland
- Other (please give details)

**Q.:** Are you responding as:

- A pharmacy professional – **Section A1**
- A member of the public – **Part 2**
- Other (Please give details) – **Part 2**



### **Section A1 - Pharmacy professionals**

**Q.:** Are you:

- A pharmacist
- A pharmacy technician
- Other (please give details)

**Q.:** Please select the option below which best describes the area which you primarily work in:

- Community pharmacy – **Section A2**
- Hospital pharmacy – **Section A3**
- Primary care organisation / provider – **Section A3**
- Pharmacy education, training and research – **Part 2**
- Pharmaceutical industry – **Part 2**
- Other (please give details) – **Section A3**

### **Section A2 – Community pharmacy**

**Q.:** Please indicate what type of community pharmacy you work in:

- Multiple
- Independent

**Q.:** Which of the options below best describes your role in the pharmacy:

- Superintendent
- Pharmacy owner
- Employee/ locum
- Other, (please give details):

### **Section A3 – Provision of services under the scope of the guidance**

**Q.:** Does your organisation currently sell or supply medicines over the internet or provide any form of distance sale, supply or service provision?

- Yes

- No
- Not at the moment, but there are plans to do this

**Section B – Responding on behalf of an organisation**

**Q.:** Please provide your contact details:

Your name:

Job Title:

Organisation:

Address:

Email :

Contact tel:

**Q.:** Please select the country / countries in which your organisation operates:

- England
- Scotland
- Wales
- Northern Ireland
- Other (please give details)

**Q.:** Please choose an option below which best describes your organisation

- Community pharmacy – **Section B1**
- Hospital pharmacy – **Section B2**
- Primary care organisation / provider – **Section B2**
- Pharmacy education, training and research – **Part 2**
- Pharmaceutical industry – **Part 2**
- Body/ organisation representing patients / the public – **Part 2**
- Body/ organisation representing professionals / practitioners – **Part 2**
- Body/ organisation representing trade/ industry – **Part 2**
- Government department/ organisation – **Part 2**





- Regulatory body – **Part 2**
- Other (please give details) – **Section B2**

### **Section B1 – Community pharmacy**

**Q.:** Please indicate what type of community pharmacy you work in:

- Multiple
- Independent

**Q.:** Which of the options below best describes your role in the pharmacy:

- Superintendent
- Pharmacy owner
- Employee/ locum
- Other, (please give details):

### **Section B2 – Provision of services under the scope of the guidance**

**Q.:** Does your organisation currently sell or supply medicines over the internet or provide any form of distance sale, supply or service provision?

- Yes
- No
- Not at the moment, but there are plans to do this

## **Part 2: Draft guidance for registered pharmacies providing internet and distance sale, supply or service provision**

### **I. Guidance under Principle 1**

Principle 1 in the standards for registered pharmacies states:

“The governance arrangements safeguard the health, safety and wellbeing of patients and the public.”

**The guidance covers the following areas under Principle 1:**

- 1.1. Risk assessment (p.7)**
- 1.2. Regular audit (p.8)**
- 1.3. Reactive review (p.9)**
- 1.4. Accountability of staff (p.9)**
- 1.5. Record keeping (p.10)**


**Question 1: Do the areas listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?**

- Yes
- No
- Not sure

**Question 2: Thinking about the areas covered in the guidance under Principle 1:**

- **Is there anything else that is relevant for registered pharmacies providing this type of service, that you think should be covered in this section of the guidance?**
- **Do you have any suggestions for improvement to this section as it is currently written?**

Please provide comments.



## II. Guidance under Principle 2

Principle 2 in the standards for registered pharmacies states:

“Staff are empowered and competent to safeguard the health, safety and wellbeing of patients and the public.”

**The guidance covers the following area under Principle 2:**

### 2.1. Trained and competent staff (p.11)

**Question 3: Does the area listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?**

- Yes
- No
- Not sure

**Question 4: Thinking about the area covered in the guidance under Principle 2:**

- **Is there anything else that is relevant for registered pharmacies providing this type of service, that you think should be covered in this section of the guidance?**
- **Do you have any suggestions for improvement to this section as it is currently written?**

Please provide comments.

### III. Guidance under Principle 3

Principle 3 in the standards for registered pharmacies states:

“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.”

**The guidance covers the following areas under Principle 3:**

**3.1. Your premises (p.12)**

**3.2. Your website (p. 12)**


**Question 5: Do the areas listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?**

- Yes
- No
- Not sure

**Question 6: Thinking about the areas covered in the guidance under Principle 3:**

- **Is there anything else that is relevant for registered pharmacies providing this type of service, that you think should be covered in this section of the guidance?**
- **Do you have any suggestions for improvement to this section as it is currently written?**

Please provide comments.



#### IV. Guidance under Principle 4

Principle 4 in the standards for registered pharmacies states:

“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.”

The guidance covers the following areas under Principle 4:

- 4.1. Transparency and patients’ choice (p.15)
- 4.2. Managing medicines safely (p. 15)
- 4.3. Supplying medicines safely (p. 16)
- 4.4. Patient information (p. 16)

**Question 7:** Do the areas listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?

- Yes
- No
- Not sure

**Question 8:** Thinking about the areas covered in the guidance under Principle 4:

- Is there anything else that is relevant for registered pharmacies providing this type of service, that you think should be covered in this section of the guidance?
- Do you have any suggestions for improvement to this section as it is currently written?

Please provide comments.

## V. Guidance under Principle 5

Principle 5 in the standards for registered pharmacies states:

“The equipment and facilities used in the provision of pharmacy services safeguard the health, safety and wellbeing of patients and the public.”

The guidance covers the following area under Principle 5:

### 5.1. Specialist equipment and facilities (p. 17)

**Question 9:** Does the area listed above provide sufficient clarity for pharmacies providing internet and distance sale, supply or service provision?

- Yes
- No
- Not sure

**Question 10:** Thinking about the area covered in the guidance under Principle 5:

- Is there anything else that is relevant for registered pharmacies providing this type of service, that you think should be covered in this section of the guidance?
- Do you have any suggestions for improvement to this section as it is currently written?

Please provide comments.

## VI. Any other comments

**Question 11:** Do you have any additional comments on the draft guidance?

Please provide comments.



## Appendix 2: Organisations which responded

Organisations that responded to the consultation (only those that provided their name are listed).

1. Alliance Boots
2. APTUK
3. Care Pharma (Romford Ltd)
4. Clarity Pharmacy
5. Community Pharmacy Scotland
6. D K WOOD LTD
7. Dispharma Retail Ltd, Greatwood Pharmacy Ltd, Washwood Heath Healthcare Ltd & Medi-care (West Midlands) Ltd
8. DrEd.com
9. Golds Pharmacy
10. Healthcare Concepts Ltd
11. Heritagecrest Ltd
12. HJ Everett Chemist Ltd
13. J K PHARMACEUTICALS LTD
14. Jaysons Pharmacy
15. Killamarsh pharmacy
16. Lilley's Pharmacy & Healthcare
17. Lockyers Pharmacy
18. MARKRISE pharmacy
19. Mecindo limited
20. MedScene Pharmacy
21. MHRA
22. NHA Pharmacy
23. PHARMACY BOND
24. Pharmacy Voice
25. PSNC
26. Rowlands Pharmacy
27. Royal Pharmaceutical Society
28. Scottish Government
29. Shropshire LPC
30. SYKES CHEMISTS LTD
31. Weldricks Pharmacy
32. White Pharmacy
33. WR Evans (Chemist) Ltd