

Pharmacy Owner  
«Owner\_Name»  
«Address\_Line\_1»  
«Address\_Line\_2»  
«Address\_Line\_3»  
«City»  
«County»  
«Postcode»

17 September 2019

Dear Pharmacy Owner

## **Action required: supplying medicines online safely**

I emailed you in April 2019 to highlight our updated guidance on providing pharmacy services at a distance, including on the internet<sup>1</sup>. Our guidance states clearly that selling and supplying medicines at a distance brings different risks which need to be appropriately managed to protect patient safety. Medicines are not ordinary items of commerce and must not be treated as such.

Our guidance clarifies that some categories of medicines are not suitable to be supplied online unless further safeguards have been put in place to make sure they are clinically appropriate for patients. One of those categories was medicines liable to abuse, overuse or misuse, or when there is a risk of addiction and ongoing monitoring is important (including opiates, sedatives, laxatives, pregabalin and gabapentin).

I asked you, as the owner of a pharmacy that has the internet pharmacy logo, to consider that guidance and inform me of your plans to meet the guidance. Thank you to those pharmacy owners who responded promptly.

## **Information required**

If you have not yet responded to this request, please send the following information about your online pharmacy via email by 16 October 2019 to [onlineupdate@pharmacyregulation.org](mailto:onlineupdate@pharmacyregulation.org):

- a copy of your full risk assessment of the services you provide online, detailing how you are managing the risks of the conditions and types of medicines you supply online

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<sup>1</sup>[www.pharmacyregulation.org/sites/default/files/document/guidance\\_for\\_registered\\_pharmacies\\_providing\\_pharmacy\\_services\\_at\\_a\\_distance\\_including\\_on\\_the\\_internet\\_april\\_2019.pdf](http://www.pharmacyregulation.org/sites/default/files/document/guidance_for_registered_pharmacies_providing_pharmacy_services_at_a_distance_including_on_the_internet_april_2019.pdf)

- any changes or improvements you have made to your online services to make sure you are following our guidance.

This will be used to proactively prioritise our inspection programme. We will follow up with any pharmacies which do not provide a satisfactory response within this time period, including what action needs to be taken in each case. Any owners who have already provided us with information do not need to do anything further.

## **Responsibilities**

The standards for registered pharmacies<sup>2</sup> and the standards for pharmacy professionals<sup>3</sup> provide a clear framework for the safe and effective care of patients and the practice of pharmacy. These are inextricably linked and need to be read together. These apply to all owners of registered pharmacies providing services at a distance and to registered pharmacy professionals working within these models. In the supply of medicines to patients, all those responsible for, and working within the pharmacy are accountable for ensuring medicines are clinically appropriate, as well as being legally compliant. We expect national prescribing guidelines for the UK, including guidance from the GMC<sup>4</sup>, to be followed by prescribers.

## **Professional judgement**

I urge you to read two recent determinations<sup>5</sup> from the Medical Practitioners' Tribunal Service and consider any implications for your pharmacy or the prescribers you work with before supplying the information requested above. Two doctors working for an online pharmacy had their GMC registration suspended after they were found to have inappropriately issued a number of online prescriptions of opioid medication. The Tribunal also found that the operating model was inappropriate in that the doctors based their prescribing decisions primarily on information provided by patients in online questionnaires. The operating model did not allow the opportunity for face to face consultations and the doctors did not have access to the patients' GP records. In some cases, the doctors prescribed habit-forming medicines even after patients refused consent for the prescribing information to be sent to their GPs.

## **Enforcement**

We are seeing serious patient safety concerns in some online pharmacies in relation to medicines that are liable to misuse, abuse or overuse, and where there is a risk of addiction.

We are taking enforcement action against the owners of online pharmacies who are supplying high-risk habit-forming medicines without appropriate steps being taken to check that the medicine being prescribed and dispensed is clinically appropriate for the patient. Improvement notices and conditions

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<sup>2</sup> [www.pharmacyregulation.org/standards/guidance/guidance-support-standards-registered-pharmacies](http://www.pharmacyregulation.org/standards/guidance/guidance-support-standards-registered-pharmacies)

<sup>3</sup> [www.pharmacyregulation.org/guidance/guidance-support-standards-pharmacy-professionals](http://www.pharmacyregulation.org/guidance/guidance-support-standards-pharmacy-professionals)

<sup>4</sup> [www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/good-medical-practice](http://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/good-medical-practice)  
[www.gmc-uk.org/-/media/documents/prescribing-guidance\\_pdf-59055247.pdf](http://www.gmc-uk.org/-/media/documents/prescribing-guidance_pdf-59055247.pdf)

<sup>5</sup> [www.mpts-uk.org/-/media/mpts-rod-files/dr-dharson-dharmasena-18-july-2019.pdf](http://www.mpts-uk.org/-/media/mpts-rod-files/dr-dharson-dharmasena-18-july-2019.pdf)  
[www.mpts-uk.org/-/media/mpts-rod-files/dr-edward-pooley-18-july-2019.pdf](http://www.mpts-uk.org/-/media/mpts-rod-files/dr-edward-pooley-18-july-2019.pdf)

on a pharmacy's registration have been imposed restricting the supply of controlled drugs by the pharmacy in line with our enforcement policy<sup>6</sup>. Action is being taken against owners of registered pharmacies as well as individual pharmacy professionals involved in both the prescribing and supply of medicines where their conduct may have fallen short of professional standards.

In light of the very real patient safety risks, if you choose to operate **or** to work within a pharmacy model where prescribing and supply decisions for habit-forming medicines are primarily informed by online questionnaires with no access to a patient's medical history or consent to contact a patient's GP, and without appropriate risk management and safeguards in place, the registration of your pharmacy or the registration of health professionals you employ could be at risk. These include those models with related prescribing services using doctors not located in the UK and/or pharmacist independent prescribers.

I am sure you appreciate the need for my additional correspondence given the patient safety risks we are seeing. It is important that we act proactively to ensure public trust and confidence in pharmacy is maintained.

Yours sincerely



**Duncan Rudkin**  
**Chief Executive**

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<sup>6</sup> [www.pharmacyregulation.org/sites/default/files/document/registered\\_pharmacies\\_enforcement\\_policy.pdf](http://www.pharmacyregulation.org/sites/default/files/document/registered_pharmacies_enforcement_policy.pdf)

