

Response to the General Pharmaceutical Council (GPhC) discussion paper on making sure patients and the public obtain medicines and other pharmacy services safely online

August 2018

1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and registration of people working in health and care. We are an independent body, accountable to the UK Parliament. More information about our work and the approach we take is available at www.professionalstandards.org.uk
- 1.2 As part of our work we:
- Oversee the nine health and care professional regulators and report annually to Parliament on their performance
 - Accredit registers of healthcare practitioners working in occupations not regulated by law through the Accredited Registers programme
 - Conduct research and advise the four UK governments on improvements in regulation
 - Promote right-touch regulation and publish papers on regulatory policy and practice.

2. General comments

- 2.1 We welcome the opportunity to comment on the GPhC's proposed changes to its guidance for pharmacy services provided on the internet or at a distance. We are pleased that the GPhC is considering stakeholder feedback to inform some of the proposed updates to the guidance.
- 2.2 We do not have detailed comments to make in respect of the questions in the discussion paper. However, we support the GPhC's proposed changes outlined in the paper. We welcome the focus on patient safety in all the proposed changes and the identification of risks.
- 2.3 We consider the timeliness of this discussion paper to be appropriate in that it addresses the significant concerns about patient safety reported by the Care Quality Commission (CQC) during inspections of online primary care providers in March 2017¹. Additionally, it is consistent with the joint statement issued by the CQC, GPhC, Medicines and Healthcare Products Regulatory Agency

¹ <https://www.cqc.org.uk/news/releases/care-quality-commission-advises-people-take-care-when-using-online-primary-care> [Accessed 17 August 2018]

(MHRA) and General Medical Council (GMC) regarding the issue of patient care in the same period.²

- 2.4 We note that the proposed amendments to the guidance are consistent with the GPhC's updated Standards for Registered Pharmacies in June 2018. We understand the changes to the guidance are intended to make it clearer to registrants, service users and members of the public what the GPhC's expectations are of pharmacy owners who provide these services. We support this approach, which demonstrates transparency. We are of the view that improved transparency around the regulation of online pharmacies is beneficial, especially as the regulatory landscape in this area is particularly complex.

3. Further information

- 3.1 Please get in touch if you would like to discuss any aspect of this response in further detail. You can contact us at:

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² See footnote 1