

Response to General Pharmaceutical Council's consultation on guidance for registered pharmacies providing pharmacy services at a distance, including on the internet

October 2024

1. Introduction

1.1 The Professional Standards Authority for Health and Social Care (PSA) 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 ten 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 provide comments on the General Pharmaceutical Council's (GPhC) consultation on proposed changes to the guidance on providing pharmacy services at a distance, including on the internet.
- 2.2 In our report Safer Care for All: Solutions from Professional Regulation and Beyond¹, we highlighted key concerns on remote healthcare in the section Regulation fit for the future: regulating virtual healthcare and technologies. In particular, we raised concerns on issues specific to the pharmacy sector. This includes "allowing customers to effectively 'shop' for particular medicines, poor identity checking processes, and prescribing high risk medications through an online form" (Safer Care for All, page 48).
- 2.3 We note the GPhC have cited growing concerns on the inappropriate prescriptions of weight loss medication, which poses significant risks to patient safety. Therefore, we welcome and support the changes that the GPhC are

¹ Professional Standards Authority for Health and Social Care, 'Safer Care for All: Solutions from Professional Regulation and Beyond'

proposing to make. Patient safety risks can be mitigated by strengthening the safeguards for patients using online services and providing guidance for pharmacists on selecting appropriate modes of consultation. Increasing the scope of the guidance to include Superintendent Pharmacists will encourage stricter remote prescription processes.

- 2.4 The suggested changes to the guidance are in line with GPhC's commitment to taking enforcement and regulatory action in response to the BBC's investigation on the purchase of prescription-only medicines from online pharmacies (PSA Performance Review for GPhC 2023/24, page 4). We encourage the GPhC to continually monitor their guidance on this area to ensure that patients receive the appropriate medicines in a safe environment, and that prescribers are held accountable when providing their services.
- 2.5 We were disappointed that the GPhC has provided such a short timeframe for this consultation and would recommend a longer timeframe of at least 6 weeks (and preferably 12 weeks) for future consultations, to allow for more comprehensive responses that are representative of all relevant stakeholders.

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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