

Mark Koziol  
Chairman  
PDA

By Email: [mark@koziol.org](mailto:mark@koziol.org)

3 December 2021

Dear Mark

Thank you for bringing together the matters raised by some of your members in your letter of 26th November to our attention. It is important that we continue to understand and consider the impact of automation and online pharmacy provision on patient safety and pharmacy practice now and as it evolves. Hearing from those working first-hand within technology-based operations is particularly helpful and provides valuable insights.

The concerns raised are of clear interest to us, not only with regards to the potential immediate operational patient safety concerns, but also by way of broader implications for our wider policy work and how we regulate going forwards. They also raise important questions for other organisations who also have a role in regulating, establishing quality and professional standards as well as improvement.

We are seeing delivery models for pharmacy services changing fast, including in the use of technology, automation and artificial intelligence (AI). In line with our Vision 2030 our position remains that regulation should not stand in the way of innovation, but it needs to be consistent with the legal framework, and the outcomes must meet our standards. Our Vision also recognises that our regulatory standards framework needs to be adaptable to meet the changing needs of pharmacy to ensure the safe and effective delivery of pharmacy services to patients. Your letter is helpful in informing some of the work being planned within our Strategic Plan, including how we regulate. As part of that work, we would of course also want to understand the public's perspectives and expectations in this area.

Given the number and range of concerns raised in your letter, some of which are complex and interrelated, we will take some time to review the information you have provided and carefully consider what regulatory activities would be most appropriate to take, how and when. The concerns you raise are likely to be of interest to a number of other organisations who have a direct remit or interest in these areas. This may need to include some collaborative work going forwards.

In the short term we will be looking into the concerns raised about existing pharmacy operations that may present current risks to patient safety. This will also be helpful to better inform further regulatory activities.

I will look to update you as we progress matters.

Thank you again for forwarding the concerns.

Yours sincerely

A handwritten signature in black ink, appearing to read "Duncan Rudkin". The signature is written in a cursive, flowing style.

**Duncan Rudkin**  
**Chief Executive & Registrar**