



The Pharmacists' Defence Association  
Old Fire Station  
69 Albion Street  
Birmingham, B1 3EA

Alette Addison  
Deputy Director of Pharmacy, Eye Care and Controlled Drugs (used as medicines)  
**Department of Health & Social Care**

23 February 2024

Dear Alette,

As you will recall, the Supervision Sector Group concluded that the presence of the pharmacist was the cornerstone of future community pharmacy practice. As far as any decision to pass on any responsibilities to any members of staff is concerned, it was only the pharmacist in the pharmacy who could be best placed to make such a decision. This was decided as it was considered that subject to the Responsible Pharmacist (RP) undertaking the clinical assessment, it was the RP that was ideally placed to be able to assess the situation in the pharmacy at any one time and be able to decide the appropriateness or otherwise of passing on these activities to pharmacy technicians or other members of staff.

However, the consultation narrative contains the following extract under Proposal 2 which deals with the possibility of handing out pre-checked and pre-bagged items in the temporary absence of the pharmacist.

**Extract:**

*“Additionally, if a prescription only or pharmacy medicine has been dispensed and is ready for sale or supply at or from a registered pharmacy, **a pharmacist anywhere in the United Kingdom** will be able to authorise any member of the pharmacy staff to undertake the final supply of that medicine in the pharmacist’s absence – or where the pharmacist is treated as being absent because they are unavailable or not in a position to intervene (for example, because they are providing clinical services to a patient) (article 7(4)).”*

This has unsurprisingly alarmed many of our members since, as read, this could mean that authorisation could be given remotely by any pharmacist (e.g. an area manager or a head office superintendent).

This would be tantamount to undermining the authority of the RP, a breakdown of the RP regime and would result in a diminution of patient safety.

It would be very helpful if you could indicate whether the intention behind the above extract is that;

- a) any pharmacist (e.g. an area manager or Superintendent pharmacist) could remotely authorise staff in a pharmacy in the temporary absence of a RP to hand out pre-checked and pre-bagged items.

Or

- b) That only the pharmacist who will be temporarily absent from the pharmacy (probably the RP) will be able to make this decision, but that this legal provision will be available to pharmacists in the territory of any of the 4 UK countries.

We would very much like to clarify this issue for the benefit of our members in the run up to the consultation deadline and so that our organisational response can reflect the correct interpretation.

I look forward to your response.

Kind regards

A handwritten signature in black ink, appearing to read 'Mark Koziol', with a small comma at the end.

Mark Koziol M.R.Pharm.S.

Chairman