

DEVON LPC RESPONSIBLE PHARMACIST EVENTS

Workshop Activities & Answer Highlights

Introduction

As part of the Responsible Pharmacist events the LPC facilitated a number of workshop activities, where pharmacists and pharmacy staff could think through professional dilemmas relating to the responsible pharmacist legislation. We have included in this document the highlights of the feedback to indicate the thoughts and opinions of the groups. We hope that the feedback provides examples of how to assess and respond to difficult situation that could occur because of the responsible pharmacist regulations. The reader should note however each individual dilemma should be responded to differently considering all the circumstances needs and your own strengths and weaknesses.

Disclaimer: This document is intended to show the ideas and workings of the groups who undertook the specific tasks at the LPC events. It has been produced to assist pharmacists in working through difficult professional dilemmas in relation to the responsible pharmacist legislation. However, it is in no way intended to represent an authoritative statement on the law. There is no substitute for reference to the law itself or for seeking professional legal advice as to what the law says or how it applies in particular circumstances.

Workshop Activities

You are asked to work through the scenarios below focussing on your responsibilities of the legal operation of the pharmacy, your professional standards and ethics. Please consider all your options for each scenario.

1. The Last Minute Booking.

You are a locum pharmacist and only usually work for a small number of local contractor pharmacies that are well known to you. However one day a very enticing offer makes you agree to work for a pharmacy that is unknown to you. What questions would you ask about the pharmacy before you confirmed the booking? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- Are you going to be the responsible pharmacist
- Business levels of the pharmacy, prescriptions, OTC, substance misuse clients, opening hours and rest break
- Staffing levels, qualifications and competencies, working hours, key holder
- What premium remuneration and expenses will be paid
- Where are the SOPs, pharmacy record
- Is there a locum folder available, can you have emergency contacts
- Any outstanding issues that you need to be aware of
- Use the Devon LPC and South West Locums 'Pre-booking check list' (available on website)

What would you do if you were not able to review the SOPs before the day of the booking? List the SOPs that you need to have established in the pharmacy to meet legal requirements.

- Request the SOPs before booking and ask for paid time to look at them
- We would arrive early to the pharmacy and get paid for time to review the required SOPs to check that I felt they were safe
- Bring our own SOPs to the pharmacy just in case we felt that the SOPs we unsafe. As we would be responsible for the 'safe an effective running of the pharmacy'
- The NPAs model SOPs can be downloaded from the Chemist and Druggist website and kept until they are needed
- The problem of using new SOPs, is that the staff would have to be trained on them and this would take time

2. The Just Closing Request

When locking up the pharmacy with your dispenser after closing, a patient's carer approaches you and pleads for a prescription you know you have dispensed during the day. They desperately need the strong pain killers that evening as the patient has run out due to increasing the dose. How would you deal with this request? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- First and foremost we must consider the patients welfare as they urgently need the medication (principle one and two of the code of ethics)
- We would re-open pharmacy the pharmacy, sign into the pharmacy record and give out the prescription. Then we would sign out

3. Concerns About An SOP

You are working on a Sunday as a responsible pharmacist when you notice in the pharmacy's SOP, that it requires the person who assembled the prescription to have a second person checking the work. This has not been a problem during the morning but the only member of staff, a dispenser is going to take their lunch break. Explain what you would do when the dispenser goes off for her lunch? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- We could temporarily amend the SOP to allow a single check of an assembled prescription.
- We would need to annotate the change, put the time and date and put why the amendment was made
- Another option would be to ask if the patient could return to the pharmacy when dispenser has returned from her lunch to complete the second check
- For any amendments made to the SOP we should keep an audit trail of the details of the issue and the amendment
- Last option could be to close the pharmacy for lunch and take our rest break at the same time, we would need to consider the pharmacies contracted opening times

What could you do if you realised the problem in the SOP earlier?

- We could review the appropriateness of the second check with area manager/superintendent and suggest a permanent change to the SOP
- Another option would be to change the staff schedule and arrange for more staff to cover the lunch hour

4. The Travelling Responsible Pharmacist

You are a relief pharmacist working for a multiple pharmacy company. One day when working as the responsible pharmacist, you are asked to leave the pharmacy that you are working in to travel to another busier pharmacy which has no pharmacist. You have been told a replacement pharmacist can make it to the pharmacy you are about to leave in 50 minutes, can the pharmacy continue to operate under the 'allowable absence' until your replacement arrives? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- A work around would be to sign off the Pharmacist Record at premises A (one pharmacist one pharmacy rule) and you could sign on remotely to the pharmacy that you have been asked to travel to. The staff could then undertake more activities (See RPSGB guidance on allowed activities)
- You would need to be satisfied that the pharmacy would be 'safe and effective', we would probably not sign on to a pharmacy we have not worked in before
- Then the pharmacist travelling to replace you could do the same remote sign in when he is a short travelling time from Pharmacy A
- As it was an absence we would have to consider the prompt return and contactable stipulations in the legislation
- Or we could close both pharmacies until the responsible pharmacist was on the premises

5. A Patient Visit Request

You sign in to the 100 hour pharmacy where you are working for the evening shift, it is quiet when you receive a call from a patient in some distress. A blister pack patient has knocked their pack onto the floor and the doses are all mixed up, the patient can't recognise which tablets are which. You know from the patient record the patient lives alone and takes a number of medicines for their Parkinson's disease. You decide to visit the patient but notice that the pharmacist before you was absent for an hour and 45 minutes for a meeting at the surgery. What can you do? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- Do we have to leave the pharmacy to sort this problem out: Can the patient bring the blister pack to the pharmacy for correction? Or Can we deliver one days worth of medicines using an emergency supply
- We would need to remember that we have the welfare of the all the patients to consider, this includes the patients that might enter the pharmacy during our absence
- Another option is that we can send another competent member of staff who could travel to the patient to sort out the problem
- If we did need to leave we could only be absent for a total of 15 minutes, if we were longer the pharmacy would have to close
- Leave a communication to the staff working tomorrow so they are made aware of the problem

6. The Urgent Delivery

A member of your dispensary team receives a phone call from a distressed patient, the patient asked if her medication could be delivered today as she did not realise she had run out of her blood thinning medication. You know the patient well and as she is house bound, you decide to

deliver her medication. Your delivery driver then asks you, if they can deliver the lady's medication on the way home as she lives around the corner from their house. If the pharmacy will be closed at that point, will it be possible to do this? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- Check the pharmacy's SOP for how deliveries should be operated
- With the new guidance from the RPSGB, the delivery medicines can be handed to the delivery driver when the Responsible Pharmacist is in charge and is supervising transaction, they then can be conveyed to the patient when the pharmacy is closed
- It would be good practice to ensure the patient does not need any counselling on the medication before you deliver it as you will be un-contactable after the delivery

7. Factory Pharmacy

As the pharmacy manager of an extremely busy prescription pharmacy, you employ two dispensers who come into the branch two hours before opening to put away the wholesaler order and to assemble repeat prescriptions. You know that without these additional hours the business would find it difficult to complete the prescriptions each day. Can you continue to complete repeat prescriptions and/or put away a wholesale order before the pharmacy has a responsible pharmacist? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- The guidance provided by the RPSGB on the activities that can be undertaken, states that prescriptions can only be assembled when there is a responsible pharmacist in charge of the pharmacy
- It is fine to accept and put away a wholesale order, however controlled drugs cannot be accepted from delivery driver if there is no responsible pharmacist on the premises
- A work around to allow the appropriately trained and competent staff to assemble medicines would be to sign into the pharmacy record remotely or in person then an allowable absence can occur
- The NPA is advising that a responsible pharmacist could sign in on a Monday morning and sign out on a Friday evening, this would negate the need to sign in to the pharmacy record two hours before opening (see Chemist and Druggist FAQs)
- We would need to note this would increase our working hours each week and thus affect our contract

8. Forgotten To Sign Out?

You are an owner of a small urban pharmacy and at the end of the working day you get a rush of patients with acute prescriptions. You manage to clear the prescriptions and leave only 10 minutes late, however when you get home you realise you have forgotten to sign out of the pharmacy record. What can you do? You are not working in the branch tomorrow as you have a meeting first thing with the bank manager. Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- The pharmacy record should be kept contemporaneous and to meet that requirement we would need to ask the pharmacist to sign us out of the record, they could put an amendment
- The Responsible Pharmacist can then sign in as usual
- It might be best practice to keep a record of why the amendment was made

9. A Swine Of A Day

It is the middle of a flu pandemic and you are a conscientious and dedicated manager of a multiple pharmacy. Your pharmacy has been suffering with staff absence but you manage to get a couple of staff members from a nearby store to help you today. Fifteen minutes after you opened the pharmacy there is no sign any staff and you are on your own. The pharmacy has thirty substance misuse clients and a busy OTC business. As you watch the queue in the shop build up all you want to do is shut the door. What do you do? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- We need to consider the following things:
 - Personal safety. Do we feel safe in branch on our own? What do the pharmacy's SOP recommend?
 - Patient safety. Would it be safe for one person to try and provide a full pharmaceutical service?
 - Security of business.
- Firstly explain to patients that you cannot offer a full service and either significantly reduce service provision (i.e. urgent prescriptions only) or close the pharmacy temporarily
- Try contact staff members and check that they are not coming in for the day
- Contact PCT, Area manager, superintendent
- Explain fully to the patient the situation and signpost to other local pharmacies
- Place a notice on the door with a estimated time for opening
- Record reasoning to the actions taken to resolve situation
- Place focus on patient welfare and dispense, if possible substance misuse items, but only do so if you can be sure of personal safety

10. Error In Pharmacy Record

When signing into the pharmacy record before you start your shift you notice an error. The previous day's responsible pharmacist has put the wrong date into the record, the date they have entered is today's date. Should you correct the error now or wait until the pharmacist who made the error returns to do it? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- Alter the pharmacy record as a CD register, that is with no crossing out and use brackets and annotations to insert the amendment
- Contact the previous day's pharmacist to inform them of the error and that you have corrected it
- Record the problem in your diary as an additional audit trail

11. A Visit To The Middle Of Nowhere

You are an owner of a small rural pharmacy in a beautiful town on Dartmoor. A patient who is house bound has been experiencing problems with their medicines and you have booked some time out during your day to do a visit. You believe that as the patient's house is literally in the middle of nowhere, therefore it is likely there is no mobile signal. Can you still complete the planned visit? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- Yes the visit could continue but you would have to make certain provisions
- We would have to be contactable when on an allowable absence, however an alternative is we you could provide the staff with a nominated contact pharmacist
- We could obtain the patient's landline number so we could be contacted while we were at the premises, however pharmacy staff would still need a pharmacist contact for journey
- On an absence we must be able to return to the pharmacy with 'reasonable promptness', would this be possible from the 'middle of nowhere'?
- How would this absence affect the running of the pharmacy business while we were away? We must consider the needs of the patients that could want services or products while we were absent
- We would try to re-arrange visit when there was two pharmacists on the premises

12. Were You Absent?

A health centre pharmacy where you work has a consultation room that is located in the surgery, you are able to use the room for private consultations and medicines use reviews when required. One busy day you complete five MURs and you are very pleased as the company rewards you for each one you do. The MURs have been quite complex and worthwhile, however each one has taken around twenty minutes to complete. A patient enters the pharmacy with a problem with their medication, you believe a MUR would be very beneficial as they are taking ten medicines. Is there something you need to keep in mind if you choose to do the complex MUR consultation? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- We have assumed that the consultation room is not part of the registered premises. Although it would be advisable to check with owner or superintendent
- As we have completed around 100 minutes of absence we can only be absent for another 20 minutes more. Would this be enough to do a long MUR on a patient taking ten medicines? And any rest breaks necessary? – We would have concerns about working without a break
- We could try to discuss with the patient our time restriction, and then we would try to resolve the immediate problem. The MUR could be re-booked for another day.

13. A Tough Call

You have recently taken a new position at a busy community pharmacy which is a member of a small chain. You are due to start in your position in a few weeks and you ask the superintendent for the pharmacy's SOPs so you can understand them. The first thing you notice is that the SOPs have not been reviewed in 3 years and that there are a few areas around the quality and quantity of staffing where you feel the procedures are unsafe. What do you do? Who has what responsibility? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- Are you going to be the responsible pharmacist? If it is going to be me then I will be responsible for the safe and effective running of the pharmacy
- We would contact the superintendent or pharmacy owner to inform them that the SOPs should be reviewed every two years or when an incident occurs
- We would ask to meet with the superintendent or owner to confirm that the pharmacy had adequate number of competent staff
- If there was a disagreement over the SOPs or staffing we would keep a record of the conversation and remind the superintendent of the following points:
- The superintendent has the overall management responsibility for ensuring that the **company enables pharmacists to comply with the legal, ethical and professional requirements** relating to the sale and supply of medicines.
- The DH advises that superintendents should not seek to impose procedures on responsible pharmacist (RP), but rather "allow sufficient flexibility... to allow the RP to tailor procedures to the specific operational needs of the pharmacy and to discuss any need for local variations"

14. A Quick Test

You have been working as the responsible pharmacist for a pharmacy over the past few days. The company procedures are well known to you and you are confident in the pharmacy's basic activities. You notice a member of the pharmacy team inviting a patient into the consultation room and ten minutes later the staff member approaches you to sign off a cholesterol check result. Do you sign it? What should have happened? Please list all your thoughts so you ensure you meet legal, professional and ethical requirements and explain your rationale for each decision.

- Are we competent in the health check and has the member of staff been trained and accredited to conduct the test?
- Has the equipment been well maintained and calibrated in line with manufacturers guidance
- Is there SOPs to cover the test and maintenance
- If we felt that all the above had been met then we would feel confident about signing it