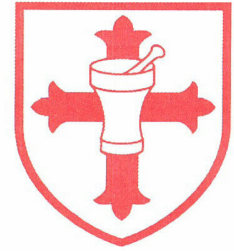

GHP

*Guild of
Healthcare
Pharmacists*



Priya Sejpal
Royal Pharmaceutical Society of Great Britain
1, Lambeth High Street
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17th October 2008

Dear Priya

**Consultation on amendments to “Professional Standards and Guidance for the Sale and Supply of Medicines” and “Professional Standards and Guidance for Internet Pharmacy Services”:
Posting of Medicines**

Response from the Guild of Healthcare Pharmacists

Thank you for the opportunity to respond to this consultation. The Guild of Healthcare Pharmacists represents UK wide around 4,000 pharmacists including the majority of hospital pharmacists, pharmacists employed by Primary Care Trusts (PCTs) and pharmacists employed by other public bodies such as the Commission for Social Care Inspection and the Healthcare Commission. The Guild is part of the health sector of the union Unite-Amicus section.

If a change is to be made to the Professional Standards to allow medicines to be posted through letterboxes:

1. The Post Office needs to be consulted as to what they view as acceptable for their staff to do
2. In order to maintain patient safety and patient confidentiality, the guidance should include that a risk assessment of the individual situation must be carried out, as detailed in the answers below.

The RPSGB needs to avoid possible future headlines: “Child dies through eating mother’s tablets posted through letter box”!

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The questions in the consultation questionnaire are reproduced below together with our responses.

Question 1

Do you believe that medicines should be allowed to be posted through the letter box?

Only if each individual situation is assessed to ensure that if a medicine is posted through a letter box it will not be picked up by a child, confused elderly person or an animal or by another person who is not the intended recipient if a communal letter box. Other wise it should be signed for.

The views of the Post office should be sought as to what they expect their staff to do/not do.

Medicines are potentially dangerous substances and the public should treat them with respect. Other commodities ordered on the internet, deemed by the supplier to be sufficiently valuable (and this does not have to be a large sum of money) have to be signed for. Some firms will deliver at a particular time chosen by the customer, for example in the evening, for a small additional fee. Medicines are often expensive items so should be treated with similar respect and we need to ensure they reach the intended recipient as efficiently and safely as possible.

It would be inconsistent to have a legal requirement on a labelled medicine saying "Keep out of reach of children" but allow a system whereby medicines are allowed to be within reach of children.

The risk of children or pets opening the package and ingesting some of the contents is real. When a signature is not needed some carriers' drivers leave parcels outside the front door if no one is in, thus straying pets could chew open the parcel. This type of situation needs to be avoided.

Communal postal delivery areas could allow someone other than the intended recipient to take the medicines possibly for illicit use.

There is also a confidentiality issue: see response to Q3 below.

Question 2

Do you believe that certain medicines should not be posted through the letter box, for example, Controlled Drugs or medicines the patient has not received before?

Yes

For Controlled Drugs this would not meet legal requirements.

Question 3

Do you believe that the request to deliver a medicine to a third person must be documented (for example, in writing or through website approval)?

Yes

Medicines are part of a patient's treatment and therefore this should remain confidential unless the patient wishes to disclose the information to someone else. To demonstrate that

confidentiality is being respected there must be written/recorded permission from the patient to deliver medicines to a third party.

Question 4

If you provide pharmacy services, do you agree that the requirement to obtain a signature, as part of good practice, should be amended to incorporate other forms of tracking, such as GPRS systems?

Yes

We query why you appear to be restricting the responses to pharmacy services providers in this question? This is equally relevant to patients.

The record, whether written or electronic must demonstrate clearly that the intended recipient did receive the goods. Electronic signatures should be acceptable. Merely tracking a parcel to the door of the dwelling will not necessarily show that the intended recipient has indeed received the item.

Question 5

If you provide pharmacy services, do you currently provide delivery services to your patients?

We query why you appear to be restricting the responses to those who provide “delivery services”? Our members will deliver medicines under certain circumstances. This is just as relevant to the consultation.

Question 6

*What forms of delivery service do you use? You may tick more than one box.
Member of staff Delivery driver Postal service Other*

Our members use a variety of methods including those noted above.

We hope these comments are of assistance

Our reply may be made freely available.

Yours sincerely

Jean Curtis

Jean Curtis
Professional Secretary