We need guidance for middle managers and to keep P medicines out of reach

Christopher A. Langley, senior lecturer in pharmacy practice from Aston University, and Joy Wingfield, special professor of pharmacy law and ethics, Nottingham University, give the views of the APPLET Network on the “Healthcare and associated professions: setting standards” consultation

When the Council for Healthcare Regulatory Excellence consulted on draft standards (“Health care and associated professions: setting standards”) covering the minimum regulatory requirements for pharmacy owners, superintendent pharmacists and premises last year (PfJ, 24 October 2009, p435), members of the Advancing the Provision of Pharmacy Law and Ethics Teaching (APPLET) Network took a keen interest.

On the proportionality of the draft standards for owners of pharmacies and superintendent pharmacists, APPLET Network members, who were disappointed that there was nothing in the draft standards that used the powers in both the 2007 legislation and 2009 draft Pharmacy Order to publish guidance for non-pharmacists whose position affects activities of pharmacists and pharmacy technicians. This is needed for middle managers and marker appointment of the effect of the responsible pharmacist to satisfy the detailed, as opposed to requirements for staff training. For the safer supply of medicines, the main points are: enough to ensure that first, the counter assistant or other member of staff has the opportunity to establish certain prior information before making the sale (eg, using the 2WHAM process). A significant number of P medicines were only moved to P category from prescription-only status because of the reasonable certainty that, if not on self-selection, certain screening questions would be asked before supply. Second, their positioning conveys a clear message that P medicines are somehow special or different from general sale list medicines. Indeed the public usually regard them as “stronger” which, in fact, many of them are.

Public expectation is now well established and the proportion of medicines not being available for self-selection, which are most easily addressed by P medicines being displayed in the same way as GSL medicines they would soon come to be regarded as no different. Ultimately this might lead to the loss of the P category altogether, which would mean the loss of a valuable halfway house between POM and GSL. Third, because access to P medicines is currently via a counter assistant, this provides an opportunity for purchasers to check the suitability of the product for their purposes or to be referred to a pharmacist for further assistance, or both. The caveat proposed in the standards was capable of wide interpretation and subversion and would have been better expressed by requiring that sales must incorporate measures to achieve those safeguards - which are most easily addressed by P medicines not being available for self-selection.

Last month the General Pharmaceutical Council launched its own consultation “Consultation on the revised draft standards for the General Pharmaceutical Council” (PfJ, 24 April 2010, p387). It seems that some of APPLET’s suggestions have been taken on board but we look forward to the final set of standards. Responses to the GPhC consultation must be received by 28 May 2010.

APPLET Network
For over five years, the APPLET project worked to develop the professional ethics and law components of the UK MPharm course by providing web-based teaching, learning and assessment resources for teachers; a consensus curriculum describing the range and depth of teaching of professional ethics and law; study days and short residential courses in these topics for teachers and a network of MPharm teachers delivering key components of the professionalism expected in the future pharmacy workforce.

In 2008 the APPLET project transformed into the APPLET Network with aims to be the voice of educators in professionalism, to develop capacity and capability among those who educate for professionalism and to sustain and develop the APPLET project resources for all who educate for professionalism.

In addition to the articulation of our views in the GPhC ethics standards consultation, we believe that the network has a positive contribution to make, both in the design and delivery of detailed curricula for the training needs of a wide range of individuals who collaborate to deliver pharmacy services. Further information on the APPLET Network (including how to become a member) or a copy of the network’s response to this consultation, can be obtained by contacting Chris Langley (e-mail c.a.langley@aston.ac.uk).