

Standards and Guidance for Internet Pharmacy Services in Northern Ireland

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Summary

The Pharmaceutical Society of Northern Ireland has updated its standards and guidance on internet pharmacy services to enhance clarity and provide greater assurances to the public regarding the provision of internet pharmacy services from registered pharmacy premises in Northern Ireland.

The standards and guidance outlined in this document are what we expect the owners and superintendents of registered pharmacy premises in Northern Ireland to meet in the provision of internet pharmacy services.

These proposals **only apply to internet pharmacy services in Northern Ireland**. Internet pharmacies which are based outside Northern Ireland **fall outside the regulatory jurisdiction of the Pharmaceutical Society of Northern Ireland**.

The standards and guidance take account of all aspects of the complex legal framework around medicines and pharmacy, including the legal responsibilities of the 'Responsible Pharmacist' defined in the Health Act 2006¹, and Government regulations made under it.

The standards and guidance are addressed to pharmacists but should also help patients and the public understand what is expected of a pharmacist/pharmacy providing internet pharmacy services in registered pharmacy premises in Northern Ireland.

For ease of reading, throughout this document; 'his' – masculine pronoun is understood to refer to male/female gender.

An internet pharmacy service should not be a substitute for a face to face consultation with a pharmacist or other appropriate healthcare professional, but when used safely and appropriately, online access to medicines and healthcare advice can offer benefits to patients.

This document does not give detailed guidance on legal requirements when selling or supplying medicines via the internet.

The pharmacist must comply with relevant legislative and contractual requirements, including Health Service terms of service.

Please note that the Pharmaceutical Society of Northern Ireland does not have regulatory jurisdiction on internet pharmacy premises based outside Northern Ireland.

¹ <http://www.legislation.gov.uk/ukpga/2006/28/contents>

Background

This document expands on the principles of the Code of Ethics² to explain the pharmacist's professional responsibilities when selling and supplying medicines via the internet. It is designed to meet Pharmaceutical Society of Northern Ireland obligations and other relevant legislation.

Code of Ethics

The Code of Ethics sets out eight principles of ethical practice that the pharmacist must follow. It provides a framework for professional decision-making and it is the pharmacist's responsibility to apply the principles to daily work situations, using his professional judgement. The guidance is not meant to be exhaustive, nor can it be.

Principle 1 of the Code of Ethics states that you must '*Make the safety and welfare of your patients your prime concern*'. In adhering to this principle, the pharmacist is expected to:

- Provide a proper standard of practice and care to those for whom he provides professional services
- Seek all relevant information required to assess an individual's needs and to provide appropriate treatment and care. Where necessary, he should refer patients to other health or social care professionals or other relevant organisations
- Seek to ensure safe and timely access to medicines and take steps to be satisfied of the clinical appropriateness of medicines supplied to individual patients
- Encourage the effective use of medicines and to be satisfied that patients, or those who care for them, know how to use their medicines
- Be satisfied as to the integrity and quality of products to be supplied to patients
- Ensure he has access to the facilities, equipment and materials necessary to provide services to professionally accepted standards
- Ensure he records patient consent either in writing or electronically before providing a professional service.

² Pharmaceutical Society NI Code of Ethics (June 2009):
<http://www.psnri.org.uk/documents/312/Code+of+Ethics+for+Pharmacists+in+Northern+Ireland.pdf>

Professional standards and best practice guidance

Principle 8.8 of the Code of Ethics states that a pharmacist must comply with legal requirements, mandatory professional standards and accepted best practice guidance.

This document contains:

- **Mandatory professional standards** (indicated by the word 'must' and 'have to') for all registered pharmacists;

and

- **Guidance** on good practice (indicated by the word 'should', 'might', 'may', 'would', 'will' and 'could') which should be followed in all normal circumstances.

All pharmacists should be familiar with these standards and understand that they have a professional responsibility to raise concerns³ if they believe the standards are not being met.

Serious or persistent failure to follow this guidance will put a pharmacist's registration at risk. The pharmacist must, therefore, be prepared to explain and justify his⁴ actions.

If a complaint is made against a pharmacist, the Pharmaceutical Society of Northern Ireland's Fitness to Practise process will take account of the requirements of the Code of Ethics and underpinning documents, including this one.

The pharmacist will be expected to justify any decision to act outside the terms set down in these documents.

³ Pharmaceutical Society NI 'Guidance on Raising Concerns' (June 2009)
<http://www.psni.org.uk/documents/314/Guidance+on+Raising+Concerns.pdf>

⁴'his' – masculine pronoun is understood to refer to male/female gender

1. Internet pharmacy services in Northern Ireland

Pharmaceutical services provided to the public via the internet include amongst other things, the dispensing of prescriptions, the sale of medicines and the provision of information on website pages. For the purpose of this document, the Pharmaceutical Society of Northern Ireland defines internet pharmacy as:

'A registered pharmacy which offers to sell or supply medicines (or other pharmaceutical products) and/or provides other professional services over the internet, or makes arrangements for the supply of such products or provision of such services over the internet.'

The sale and supply of general sale list (GSL), pharmacy and prescription only medicines (POM) for human or animal use via the internet must be made in accordance with the Medicines Act 1968.

This requires that:

- 1.1 The registered pharmacy premises from where the sale and supply of a pharmacy and prescription-only medicine takes place must be registered with the Pharmaceutical Society of Northern Ireland;
- 1.2 A person carrying on a retail pharmacy business shall be taken to be a person lawfully conducting such a business⁵, that is, a qualified pharmacist owner or if the pharmacy is owned by a 'body corporate' (for example a company) a superintendent pharmacist;
- 1.3 The registered pharmacy premises must be under the control⁶ of a Responsible Pharmacist and supervision requirements for pharmacy and prescription only medicine sales must be met;
- 1.4 Prescription Only Medicines (POMs) must be supplied only in accordance with:
 - a legally valid prescription
 - health service regulations
 - veterinary medicines legislation
 - a patient group direction (PGD)
 - emergency supply,

or

 - by wholesale licence.

⁵ <http://www.legislation.gov.uk/ukpga/1968/67/section/69>

⁶ 'Personal control' was replaced in the Health Act 2006 with a new requirement that all registered pharmacy premises have a named 'responsible pharmacist' in charge of the pharmacy who is responsible for the safe and effective running of the pharmacy business. The Responsible Pharmacist regulations came into force 1 October 2009.

Best Practice Guidance

- The Medicines (Pharmacies) (Responsible Pharmacist) Regulations (2008)¹ stipulate that pharmacy procedures must cover:
 - the ordering,
 - storage,
 - preparation,
 - sale,
 - supply,
 - delivery of medicinal products outside the pharmacy, and
 - (if an incident occurs in the pharmacy) any procedure which may indicate that the pharmacy business is not running in a safe and effective manner.

Appropriate records must be kept for all the arrangements listed above.

- The pharmacy procedures must be recorded in writing and/or electronic form.
- The pharmacy procedures must be available at the premises for inspection by the:
 - person carrying on the internet pharmacy business,
 - superintendent,
 - responsible pharmacist,
 - pharmacy staff, and
 - Departmental pharmacy inspectors
- The person carrying on the pharmacy business must secure that the pharmacy record is preserved for a period of not less than five years commencing on:
 - in the case of a record in electronic form, the day on which it is created
 - in the case of a written record, the last day to which the record relates.
- An email of prescription details from the prescriber to the pharmacy does not meet the legal requirements for electronic prescribing. It does not confirm that a legally valid prescription exists and supplies should not be made against information which a prescriber or patient has sent by email until the original prescription has been received.
- The pharmacist should be alert to potential indicators that an adequate clinical assessment of a patient has not been undertaken; for example, where a prescriber is issuing, or counter-signing a high volume of prescriptions for overseas patients, or where a commercial company has employed/contracted a prescriber to issue prescriptions for patients who access its site. In such circumstances, the pharmacist should use his professional judgement to assess the appropriateness of making the supply to the patient.
- The pharmacist should ensure that there is an in-built mechanism or alarm to alert and thereby restrict excessive/multiple orders of medicines.
- Prescriptions for Schedule 2 and 3 Controlled Drugs (CDs) **must not be supplied** via the internet. It is permissible to supply Schedule 4 and 5 Controlled Drugs (CDs) in accordance with a legally valid prescription.

2. Website requirements

Standards

Patients must be able to easily identify who is operating an internet site from a registered pharmacy premises. Pharmacy websites must clearly and conspicuously display:

- The name of the pharmacy owner and/or superintendent pharmacist;
- The address of the registered pharmacy premises in Northern Ireland at which the business is conducted;
- The name and registration number of the Responsible Pharmacist in the documentation supplied to the patient;
- Information about how to confirm the registration status of the pharmacy and pharmacist;
- Details of how to make a complaint about the online services provided;
- The approved Pharmaceutical Society NI internet logo (which is purely a visual tool for patients and the public and not an accreditation of the website or the pharmacy. It indicates that the premises are routinely inspected by Pharmacy inspectors in Northern Ireland);
- An Extended Validation SSL (EV-SSL) certificate indicating to users that the website is secure and encrypted in terms of an individual entering any sensitive information. For more detail refer to <http://www.google.com/support/chrome/bin/answer.py?answer=95617>;
- The name and address of the third party suppliers if medicines are provided or supplied via a third party supplier within the UK EEA.

3. Security and confidentiality

Standards

Patients are entitled to expect pharmacists and pharmacy staff to respect and protect the confidentiality of information acquired in the course of their professional duties. (Refer to *Guidance on Patient Confidentiality*⁷).

When providing internet pharmacy services the pharmacist must be satisfied that:

- 3.1 The confidentiality and integrity of all patient information is protected to the standard specified by the International Organisation for Standardisation (ISO) in ISO/IEC 27001:2005: www.bsi-global.com;
- 3.2 All patient data transmissions are encrypted to prevent the possibility of the internet service provider or any other unauthorised party accessing patient information either accidentally or deliberately;
- 3.3 Patient information is backed up daily and kept in a secure, fire-proof system.
- 3.4 Any requests for information on a patient's medicines must only be made by either the patient or an agent acting on his behalf and be fully verifiable.

⁷ Pharmaceutical Society of Northern Ireland 'Guidance on Patient Confidentiality' (June 2009)
<http://www.psn.org.uk/documents/317/Standards+on+Patient+Confidentiality.pdf>

4. Protecting patient choice

Standards

Co-operation and close working between healthcare professionals are encouraged but a patient must be free to choose where and how he obtains his pharmaceutical services.

When providing internet pharmacy services, the pharmacist must:

- 4.1 Avoid participating in any agreement, with a prescriber or other person that has the effect of limiting patient choice;
- 4.2 Ensure that a patient is able to identify which registered pharmacy premises is providing pharmaceutical services to him;
- 4.3 Be satisfied that the patient has consented to this;
- 4.4 Take all reasonable steps to ensure that direction of prescriptions has not occurred.

5. Supplying medicines

Patients are entitled to expect the same quality of pharmaceutical care irrespective of whether the service is provided on-line or face-to-face on the pharmacy premises.

5.1 Supply of non-prescription medicines and supplements

Standards

When selling or supplying non-prescription medicines via the internet, the pharmacist must:

- 5.1.1 Ensure that advice is available to all prospective purchasers of over-the-counter (OTC) medicines and vitamin and mineral supplements. This is in addition to and/or to supplement the information contained in the PIL (Patient Information Leaflet);
- 5.1.2 Establish that the intended user is the person requesting the product: sufficient information about the patient and the condition(s) being treated must be obtained;
- 5.1.3 Assess the suitability and safety of the product for the intended user and ensure that it is appropriate for the reported indication;
- 5.1.4 Provide appropriate counselling or advice on the safe and effective use of the product to be supplied. The patient should be provided with a contact telephone number on which they can access appropriate information and advice from a suitably trained professional;
- 5.1.5 Be aware of the potential abuse of some OTC medicines and other products. The pharmacist must have measures in place to identify requests for large quantities of a product, or abnormally frequent requests and thereupon refuse to make a supply where there are reasonable grounds for suspecting misuse and/or abuse;
- 5.1.6 Advise the patient to consult a local pharmacy or other appropriate healthcare professional whenever a request for a medicine or the symptoms described indicate that the patient's best interests would be served by a face-to-face consultation;
- 5.1.7 Inform the patient of the identity of the pharmacist assuming professional responsibility for the supply of medicines.

5.2 Supplying medicines against prescriptions

Standards

Apart from limited exceptions (for example, emergency supplies and patient group directions), POMs must be supplied only in accordance with a legally valid prescription.

When supplying medicines against prescriptions the pharmacist must:

- 5.2.1 Ensure that the patient has consented to the pharmacy dispensing his prescription;
- 5.2.2 Have systems in place to prevent the unlawful sale or supply of POMs. The pharmacist must be satisfied that the prescriber is 'bona fide' and that the prescription is genuine;
- 5.2.3 Ensure a pharmacist assesses the clinical appropriateness of the prescription for the patient;
- 5.2.4 Ensure that the patient, or his/her carer, receives sufficient information to enable the safe and effective use of the medicine and is aware how further information can be obtained;
- 5.2.5 Advise the patient to go to a local pharmacy whenever a prescription indicates that his interests would be better served by a face-to-face consultation with a pharmacist or another appropriate healthcare professional;
- 5.2.6 Verify the authenticity and validity of the prescription;
- 5.2.7 Be aware that supplies of all medicines outside the UK must be in compliance with legislation both within the UK and the country to which the medicines are being sent;
- 5.2.8 Inform the patient of the identity of the pharmacist assuming professional responsibility for the supply of medicines e.g. name provided on picking note or invoice;
- 5.2.9 Comply fully with the Responsible Pharmacist regulations: must establish, maintain and review the procedures for the internet pharmacy service. (Refer to *Professional Standards and Guidance on the Responsible Pharmacist Regulations*⁸).

Please note that the procedures for an internet pharmacy service will be different to those for a conventional community pharmacy and staff must be fully apprised of the specific procedures that must be complied with in each relevant situation.

⁸ Pharmaceutical Society of Northern Ireland 'Standards and Guidance on the Responsible Pharmacist Regulations' (July 2009) <http://www.psn.org.uk/documents/352/Standards+on+the+Responsible+Pharm .pdf>

5.3 Supply of medicines via a 'third party'

Standards

When a pharmacy in Northern Ireland acts as 'a portal' for a 'third party' internet pharmacy provider, the pharmacist operating the 'portal pharmacy' is accountable for all aspects of the quality of the service and safety provided by the 'third party provider.'

The Pharmacy Owner/Superintendent Pharmacist/Responsible Pharmacist of the 'portal pharmacy' must:

- 5.3.1 Ensure that the 'portal pharmacy' where the original supply request is generated is a pharmacy registered with the Pharmaceutical Society of Northern Ireland.
- 5.3.2 Be aware that the online provision or supply of medicines via a 'third party pharmacy' may take place from a pharmacy premises registered in Northern Ireland, Great Britain or other EEA competent authority.
- 5.3.3 Ensure that high quality services are carried out at both registered pharmacy premises under robust governance arrangements, and ensure compliance with the requirements for registration and the professional standards of the Pharmaceutical Society of Northern Ireland.
- 5.3.4 Ensure that a 'nominated' pharmacist, normally the owner or superintendent of the 'third party pharmacy' premises, be accountable for the pharmaceutical activities taking place under the terms of the Third Party Agreement⁹.

⁹ A Third Party Agreement (TPA) is an agreement in writing between the owner of a pharmacy premises registered in Northern Ireland (the portal pharmacy) and the owner of another registered pharmacy premises (the third party pharmacy provider). A TPA may be used to provide a third party pharmacy service provider with the authority to undertake certain activities on behalf of a registered pharmacy premises based in Northern Ireland.

5.4 Supply of veterinary medicines

Standards

Internet pharmacies who retail veterinary medicines must comply with the prescribing and supply regulations and guidance for veterinary medical products (VMPs) set out in the *Guidance for Retailers*¹⁰ which is available on the Veterinary Medicines Directorate's (VMD) website www.vmd.defra.gov.uk.

Internet pharmacies must also observe the additional requirements of the Pharmaceutical Society of Northern Ireland.

Note for Information

From May 2012, the VMD is introducing an Accredited Internet Retailer Scheme and is inviting all internet retailers including internet pharmacies to apply for accreditation under the VMD's 'Accredited Internet Retailer Scheme'¹. Retailers who meet the accreditation criteria¹ will be able to display a special logo on their website: the VMD's Internet Retailer Logo.

Following accreditation, on-site inspections of accredited internet pharmacies will be carried out to check compliance with the Veterinary Medicines regulations by the Departmental Inspectorate.

¹⁰ <http://www.vmd.defra.gov.uk/pdf/vmgn/VMGNote03.pdf>

6. Information and advice

Standards

Patients and the public recognise the expertise that pharmacy professionals have in relation to medicines. They expect to be provided with high quality, relevant information in a manner they can easily understand.

When providing internet pharmacy services the pharmacist must ensure that:

- 6.1 Generic healthcare advice (i.e. not specific to the patient) provided on pharmacy websites is accurate, up-to-date and presented in a professional manner;
- 6.2 All information relating to specific products complies with the marketing authorisation, the patient information leaflet (PIL) and relevant legislative requirements;
- 6.3 Information relating to medicines includes all relevant details of contraindications and side-effects;
- 6.4 Product recommendations are given only in respect of individual patients;
- 6.5 Any advertising or publicity complies with relevant legislation. Promotional material the pharmacist authorises, or for which he is responsible, must be accurate and honest and must not abuse the trust, or exploit the lack of knowledge, of the public;
- 6.6 Any advice and/or written information is provided to the patient in English.

7. Posting and delivering medicines

Standards

The pharmacist has responsibility for the delivery of medicines to his patients. Medicines must be delivered safely and with appropriate instructions. When delivering medicines to a patient, whether by post or other means, the pharmacist must:

- 7.1 Take adequate steps to ensure that the delivery mechanism used is secure and that medicines are delivered to the intended user promptly, safely and in a condition appropriate for use;
- 7.2 Ensure the integrity of cold chain and safe transportation of liquid or other vulnerable packaging;
- 7.3 Ensure medicines are packed, transported and delivered in such a way that their integrity, quality and effectiveness are preserved. Care must be exercised with thermo-labile products;
- 7.4 Ensure that the delivery mechanism used provides a verifiable audit trail for the medicine from the initial request for a medicine through to its delivery to the patient or carer, or its return to the pharmacy in the event of a delivery failure;
- 7.5 Ensure that delivery mechanisms safeguard confidential information about the individual patient's medication.
- 7.6 Ensure that prescriptions for Controlled Drugs are not posted by Royal Mail as transit of Controlled Drugs is not covered by Post Office legislation.

Good Practice Guidance

The special delivery postal service should be used, which means that a signature is required to indicate safe receipt of the medicines. Systems should be in place to inform a patient who is not at home that delivery was attempted.

8. Overseas prescriptions

Standards

Supplying medicines to patients overseas carries particular risk. Overseas prescriptions for prescription-only medicines cannot legally be dispensed unless they have been issued or countersigned by a prescriber registered in the UK and/or other parts of the EEA with details of their registration number provided. There may also be differences in a product's licensed name, indications for use or the recommended dosage regimen.

A pharmacist must exercise his professional judgement and due diligence in deciding whether to dispense an overseas prescription or not. Prior to supplying¹¹ a prescription-only medicine to a patient overseas, the pharmacist must ensure that:

- 8.1 The prescription is not fraudulent; that it is legally valid and clinically appropriate for the patient;
- 8.2 Due consideration is given to any differences in the licensed indications, marketing authorisations and/or legal classification of the prescribed medicine in the UK and the patient's country of residence and that, when necessary, these are explained to the patient;
- 8.5 Appropriate information and advice is provided to the patient;
- 8.6 Legal requirements for export¹² are met;
- 8.7 Medicines will be delivered safely, securely and in accordance with *Standard 7 (Posting and delivering medicines)*;
- 8.8 Professional indemnity insurance arrangements adequately cover the supply of medicines and provision of other pharmaceutical services to patients overseas;
- 8.9 Appropriate prescription records are made.

Good Practice Guidance

- The General Medical Council (GMC) advises that doctors prescribe drugs or treatment (including repeat prescriptions) **only** when they have adequate knowledge of a patient's health and medical needs.
- The pharmacist needs to be satisfied of the appropriateness of dispensing an overseas prescription. The pharmacist should consider contacting the prescriber to ascertain his reasons for prescribing for a patient abroad and satisfy himself that there has been an appropriate clinical assessment of the patient.
- The Misuse of Drugs Regulations prohibits a prescription for a Schedule 2 or 3 Controlled Drug from being signed by a prescriber whose address is not within the UK.
- Refer to Regulatory Guidance on EEA and Swiss prescriptions (*November 2010*)¹.

¹¹http://customs.hmrc.gov.uk/channelsPortalWebApp/channelsPortalWebApp.portal?_nfpb=true&_pageLabel=pageVAT_ShowContent&id=HMCE_CL_000130&propertyType=document

¹²<http://www.mhra.gov.uk/Howweregulate/Medicines/Overviewofmedicineslegislationandguidance/Importingandexporting/index.htm>

9. Record keeping

Standards

The pharmacist must maintain records about online consultations and medicines supplied which are sufficient to guard against risks of abuse or misuse. A verifiable audit trail from the initial request for a medicine through to its delivery to the patient must exist.

A pharmacist providing internet pharmacy services must maintain records of:

- 9.1 The identity of customers (i.e. name and address) who have been supplied with medicines via the internet;
- 9.2 Details of the medicines requested and supplied;
- 9.3 Details of any consultation with the patient or prescriber, interventions made and/or advice given;
- 9.4 The information upon which decisions to supply were made;
- 9.5 The identity of the pharmacist who has assumed professional responsibility for supply of a medicine following an email/online request to purchase;
- 9.6 All relevant records must be maintained for a period of not less than 5 years.

Guidance that supports this document

The Pharmaceutical Society of Northern Ireland has produced documents or guidance on the following, which should be considered in conjunction with these standards:

- Code of Ethics for pharmacists
- Professional Standards and Guidance on advertising medicines and professional services
- Professional standards and guidance for the sale and supply of medicines
- Professional standards and patient consent
- Professional standards and guidance for patient confidentiality
- Raising concerns – guidance for pharmacists

These documents are available to download from the Pharmaceutical Society of Northern Ireland's website (www.psni.org.uk) or telephone on 028 9032 6927.

Available to download from the Royal Pharmaceutical Society website: Guidance on the sale and supply of veterinary medicines.

Acknowledgement

Royal Pharmaceutical Society (RPS)

Appendix one

Internet Pharmacy Services

(Also for insertion into the Community Pharmacy Premises Standards)

P14 Internet Pharmacy Criterion:

An internet pharmacy service can only be provided via a registered pharmacy premises in Northern Ireland. It is important that those responsible for running internet pharmacy services know the standards they must meet. This is to ensure that patients receive the same quality of pharmaceutical care irrespective of whether the service is provided online or face-to-face on the pharmacy premises.

Internet Pharmacy Services	Status	Audit Result Yes No N/A	Required action	Date completed
P14.1 Provide internet pharmacy services from or via a registered pharmacy premises in Northern Ireland	Essential			
P14.2 Display clearly the approved Pharmaceutical Society of Northern Ireland internet logo ¹³ on the pharmacy website	Essential			
P14.3 Provide the name of the pharmacy owner and/or superintendent pharmacist of the registered pharmacy in Northern Ireland accountable for the safe and effective provision of internet pharmacy services	Essential			
P14.4 Provide the name of the pharmacist assuming professional responsibility at the time of supply of medicine to the patient	Essential			
P14.5 <i>If applicable</i> , provide the name and address of the third party provider and the name of the pharmacist assuming professional responsibility at the time of supply of medicine to the patient	Essential (<i>if applicable</i>)			

¹³ Refer to "Professional Standards and guidance for internet pharmacy services in Northern Ireland" section 2 on website requirements re encryption (p 5).

Internet Pharmacy Services	Status	Audit Result Yes No N/A	Required action	Date completed
P14.6 Handle all patient information confidentially and ensure that it is backed up daily	Essential			
P14.7 Ensure all patient data transmissions are encrypted ¹⁴ to prevent patient information being accessed accidentally or deliberately	Essential			
P14.8 Have systems in place to prevent the unlawful or excessive sale or supply of POMs and other medicines	Essential			
P14.9 Comply with legislation both within the UK and the country to which the medicines are being sent	Essential			
P14.10 Ensure that the delivery mechanism used is secure and that medicines are delivered to the intended user promptly, safely and in a condition appropriate for use	Essential			
P14.11 Ensure the integrity of the cold chain and safe transportation of liquid or other vulnerable packaging	Essential			
P14.12 Keep all relevant records for a period of not less than five years	Essential			

¹⁴.IBID p5.

Internet Pharmacy Services	Status	Audit Result Yes No N/A	Required action	Date completed
P14.13 Maintain adequate records of: <ul style="list-style-type: none"> - online consultations - any interventions on a prescription - medicines supplied - destination of supply - pharmacist assuming professional responsibility for the supply - name and address of third party provider and the pharmacist assuming professional responsibility at the time of supply of medicine to the patient. 	Essential			
P14.14 Keep a verifiable audit trail from initial request for a medicine through to its delivery to the patient	Essential			