

Clarifying Statement – Regulatory Approach

08 April 2020

On 18 March 2020, the Pharmaceutical Society NI issued a joint statement with the General Pharmaceutical Council recognising that, in highly challenging circumstances, professionals may need to depart from established procedures in order to care for patients and their families. You can find a copy of this statement [here](#).

This included advice on the specific issue of already dispensed medicines that had been checked by the pharmacist and that were awaiting collection, in circumstances where the responsible pharmacist has to unavoidably leave the pharmacy at short notice part-way through the day, for example, if they are ill and need to self-isolate.

To clarify, this approach should be considered exceptional and, as the statement of 18 March 2020 outlined, should only be adopted for a short time period where other options have been exhausted. Where the option is to be availed of, we would expect there to be access to a pharmacist by phone or video link to provide direction for the remaining staff in the pharmacy.

During the Covid-19 emergency, **it is unacceptable to normalise operating a pharmacy without a responsible pharmacist** (except as provided for in the current Regulations). We would expect this to happen rarely and only in exceptional circumstances.

Supplying dispensed medicines in such a situation is still unlawful. However, if the responsible pharmacist falls ill during a shift then, as the front-line healthcare professional, they could use their professional judgement to step outside of the law to put the patient first and allow such medicines to be handed out as long as arrangements have been made for another pharmacist to be available via phone or video link. In such circumstances, though still unlawful, we would support such a decision and not seek to take regulatory action in these exceptional circumstances.

This exception is only capable of being approved by the responsible pharmacist as the person directly at the front line and able to make this professional decision. In doing so, the responsible pharmacist should consider the associated risks including the procedures and practices at the pharmacy together with the pharmacy team's

knowledge and training, to ensure that patient safety is maintained. The responsible pharmacist should discuss options with those responsible for running the pharmacy business and may decide that they need to close the pharmacy if it is not safe for the pharmacy to remain open or patients are at risk.

It is essential that employers continue to act responsibly and in line with the general legislation.