

## **Community Pharmacy Managed Repeat Prescription Ordering Services**

The Local Pharmaceutical Committee (LPC) is the body constituted under the NHS Act 2006 as the body which represents local NHS Community Pharmacy Contractors in the areas of Health & Wellbeing Boards. Community Pharmacy Derbyshire is the LPC which represents all Community Pharmacy Contractors across all of Derbyshire (including Derby). Community Pharmacy Derbyshire has been formally recognised for this purpose by the NHS England Area Team (Derbyshire & Nottinghamshire).

Recently Community Pharmacy Derbyshire has been made aware of concerns raised by some Derbyshire Prescribing Committees (which advise CCGs on prescribing policy) in respect of repeat prescription management services offered from a number of Community Pharmacies in Derbyshire.

Community Pharmacy Derbyshire has therefore issued the following position statement in respect of these types of services in response to the concerns raised:

- Repeat prescription management services are offered to patients by Community Pharmacies as a means of improving convenience and reducing confusion for patients when ordering their repeat prescriptions from Practices. Amongst other things, they are intended to ensure that patients do not run out of medication whilst practices are closed. By running out of medication, patients may require an unplanned hospital admission/visit to hospital A&E department, or - worse - put themselves at risk of the clinical adverse consequences of not taking medication as required.
- All Pharmacies offering these services are strongly advised to ensure they have the requisite Standard Operating Procedures (SOPs) in place, in accordance with the Community Pharmacy Assurance Framework (CPAF) Clinical Governance requirements. Such SOPs should include:
  - A requirement to take reasonable steps so as to verify that individual items are actually required by the patient before the prescription is ordered.
  - A requirement to take reasonable steps so as to verify that there has been no change in the circumstances of the patient which could affect the need to order the prescription.
  - A requirement that any prescription so ordered by the Pharmacy which is not subsequently collected by or supplied to the patient should be returned to stock and the prescription destroyed.
  - A reminder that the ordering and subsequent submission to the NHSBSA for pricing of any prescription which has not been supplied to or collected by the patient constitutes fraud against the NHS.
  - A reminder that GPhC ethical standards require Pharmacists and Registered Technicians to ensure that at all times they “use NHS resources wisely”. Excessive and inappropriate ordering of repeat prescriptions on behalf of patients constitutes a breach of these professional obligations.
- All Pharmacies are advised that SOPs governing the operation of repeat prescription management schemes should be available for the NHS Area Team or GPhC to inspect at any time or during any contract/premises monitoring visits in accordance with the Community Pharmacy Assurance Framework (CPAF)
- Any concerns or queries by individual practices with regards to such services provided by Pharmacies to patients should in the first instance be addressed to the Pharmacy concerned.
- Medical Practices are reminded of the Professional and Ethical obligations which Community Pharmacies must observe as described above coupled with the requirements of the CPAF and Pharmacy Contract Terms of Service to ensure requisite SOPs are in place which govern the provision of these services to patients.
- Medical Practices should also be clear that if a Pharmacy orders any prescription which the practice considers unnecessary for whatever reason, this DOES NOT indicate fraudulent activity

unless that prescription has (a) not been supplied to the patient AND (b) has been submitted for pricing to the NHSBSA.

- Furthermore, practices should also be aware that the ordering of repeat prescriptions by a Pharmacy on behalf of the patient at the patient's request is de-facto no different to the patient or indeed any other representative/carer of the patient ordering the prescription. Community Pharmacy Derbyshire considers that the right of free choice of any patient to use any services of their choosing to be of paramount importance in this regard.
- Thus, Community Pharmacy Derbyshire does not consider it appropriate for practices to refuse to issue such prescriptions which are ordered on behalf of patients in good faith by Community Pharmacies under the requisite SOPs described above unless there are defined clinical reasons for doing so. Notwithstanding the potential risks to patients of such action, Community Pharmacy Derbyshire considers such action to be a potential breach of Practices' GMS/PMS/APMS obligations under their own terms of service.
- In the event that any practice believes that for whatever reason a Community Pharmacy is not acting in accordance with its obligations as described above and that its legitimate concerns have not been properly addressed following direct contact with the Community Pharmacy concerned it should be advised to contact, with evidence, the NHS England Area Team (Derbyshire & Nottinghamshire), who may choose to investigate the matter at its own discretion.
- Medical Practices and Community Pharmacies should note that the Community Pharmacy Contract Commissioner (as with all GMS, PMS and APMS Contracts) is NHS England and as such neither the CCGs, CSU, Prescribing Groups nor Medicines Management Teams have any contractual locus standi with regard to the Community Pharmacy Contract and its performance monitoring.
- Likewise any Community Pharmacy which has legitimate concerns around a Medical Practice staff's operation of its repeat ordering processes (including online repeat ordering by patients) or the refusal of a practice to issue prescriptions ordered on behalf of the patients it serves under any repeat prescription service which it offers to patients, should address such concerns directly to the practice concerned in the first instance but may in the event of such concerns not being properly addressed raise the matter, with evidence, with the NHS England Area Team (Derbyshire & Nottinghamshire) or Community Pharmacy Derbyshire. If Community Pharmacy Derbyshire receives any such complaints about the activities of medical practices in refusing to issue prescriptions ordered in good faith by any of the Pharmacy Contractors it represents, it will bring these to the attention of the NHS England Area Team (Derbyshire & Nottinghamshire).

**Community Pharmacy Derbyshire**  
**January 2014**