

## **OUTCOMES OF THE RPSGB CONSULTATION ON THE SELF-SELECTION OF PHARMACY MEDICINES**

### **BACKGROUND**

In March 2007 the Society undertook a 6 week consultation to seek views on whether there should be restrictions on the way in which Pharmacy (P) medicines are displayed to and accessed by the public. Legislation requires that Pharmacy medicines can only be sold or supplied from a registered pharmacy by a pharmacist, or someone who is acting under the supervision of a pharmacist. In addition to these legal restrictions, the Society's Code of Ethics and Standards places an ethical restriction on the accessibility of Pharmacy medicines by the public. It currently states that '*Pharmacy medicines must not be accessible for self-selection*'. As a result Pharmacy medicines are normally displayed behind the medicines counter, or in display cabinets that can only be opened by pharmacy staff.

The purpose of the consultation was to seek views on the current ethical prohibition on the self-selection of Pharmacy medicines and on possible alternative approaches for ensuring the safe, appropriate display of and access to Pharmacy medicines, to enable the Society to develop professional guidelines that reflect the views of the profession and the public.

The consultation was published in the Pharmaceutical Journal and made available on the Society's website. Copies of the consultation were also sent to a range of stakeholders, including pharmacy organisations, other healthcare organisations, regulatory bodies and patient and public interest groups.

### **CONSULTATION RESPONSES**

259 responses were received. 90% of the responses were from a mixture of individual pharmacists, pharmacy technicians and members of the public. The remaining 10% of responses were from organisations such as pharmacy businesses, pharmacy bodies, patient representative bodies, and other regulatory bodies and organisations. Of the responses from individuals, 76% were from pharmacists, 3% were from pharmacy technicians and 18% were from patients.

91% of respondents agreed that the Society should place professional restrictions on the way in which Pharmacy medicines are displayed and made accessible to the public and 64% of respondents believed that there should be a complete prohibition on the self-selection of Pharmacy medicines. The reasons for these views centered on patient safety issues and the importance of ensuring that a Pharmacy medicine is appropriate for the patient concerned and that necessary advice on the safe and effective use of the medicine is given. Respondents who did not support restrictions on the access to and display of Pharmacy medicines mainly stated that their reasons for this view were in order to promote and support self-care and patient choice. However, most of the respondents who did not agree with a prohibition on the self-selection of Pharmacy medicines did state that there still needed to be appropriate safeguards in place, for example, that Pharmacy medicines should be situated near to the pharmacy counter.

When asked if, as an alternative to a complete prohibition on the self selection of Pharmacy medicines, there are certain types or classes of Pharmacy medicines that should not be available for self-selection, 54% of respondents agreed. However, many of these respondents were in support of a complete prohibition on the self-selection of

Pharmacy medicines and framed their response in terms of the safeguards they would wish to see in place if the complete prohibition were to be removed. A number of respondents felt that it would be difficult to differentiate between which Pharmacy medicine products were suitable for self-selection and which were not, and felt that the policy on self-selection should be 'all or nothing' to avoid confusion for the public. With regard to alternative options, such as the display of empty packs of Pharmacy medicines, views were closely divided with a number of respondents raising concern about the practicalities of displaying and refilling empty packs.

A number of respondents felt that there is a distinction between 'self-selection' and 'open display' which remained unclear in the consultation and said that whilst they were against the idea of self-selection, they were supportive of different methods of displaying Pharmacy medicines.

### **OUTCOMES**

Following detailed consideration of the views expressed by members of the Pharmacy profession and members of the public during the consultation process, the Society's Council has agreed that the professional requirement that '*Pharmacy medicines must not be available for self-selection*' should remain in place. This requirement prohibits the self-selection, but not open display of Pharmacy medicines. It means that Pharmacy medicines cannot be available for patients to readily select from a pharmacy shelf in the way that GSL medicines and general items of commerce are. However, this requirement does not preclude methods of display which enable patients to better view Pharmacy medicines, such as perspex shelf screens and display cabinets, or the display of empty boxes. It is intended that further guidance to explain the difference between the open-display and self-selection of Pharmacy medicines will be published in the near future.

The Society believes that this professional requirement addresses concerns raised during the consultation process about the importance of ensuring safe, appropriate selection of Pharmacy medicines and enabling pharmacy staff to advise and intervene where necessary. At the same time, it allows display methods which enable patients to more readily see the range of Pharmacy medicines available to them and have greater involvement and choice in the purchase of Pharmacy medicines.

It is recognised that a small number of pharmacies, for example those involved in earlier trials, may currently have Pharmacy medicines available for self-selection. The Society's Council have agreed that any pharmacy with Pharmacy medicines available for self-selection will be given 6 months to make alternative arrangements. The 6 month transitional period will end on 31 December 2007, after which the Society will expect pharmacists and pharmacy owners to ensure compliance with the professional requirement that Pharmacy medicines are not available for self-selection within pharmacies.