General Pharmaceutical Council

Registered pharmacy inspection report

Pharmacy Name: Postmymeds, 132 High Street, Whitton,

Twickenham, TW2 7LL

Pharmacy reference: 9010203

Type of pharmacy: Community

Date of inspection: 17/08/2021

Pharmacy context

The pharmacy is an independently run internet pharmacy. It is on the high street in the centre of Whitton. Its services are mainly delivered over the internet. It offers a private online prescribing and supply service. And it has a small, core range of medicines for sale. Customers rarely visit the pharmacy in person. The inspection was conducted during the COVID-19 pandemic after restrictions in England had lifted.

Overall inspection outcome

Standards not all met

Required Action: Improvement Action Plan

Follow this link to find out what the inspections possible outcomes mean

Summary of notable practice for each principle

Principle	Principle finding	Exception standard reference	Notable practice	Why
1. Governance	Standards met	N/A	N/A	N/A
2. Staff	Standards met	N/A	N/A	N/A
3. Premises	Standards not all met	3.1	Standard not met	The pharmacy's website allows people to choose a prescription only medicine before completing a consultation with a prescriber. This could mean that they may not receive the most suitable treatment option for their needs.
4. Services, including medicines management	Standards met	N/A	N/A	N/A
5. Equipment and facilities	Standards met	N/A	N/A	N/A

Principle 1 - Governance ✓ Standards met

Summary findings

The pharmacy has adequate procedures to identify risk. It has written procedures to help ensure that its team members work safely. And it has insurance to cover its services. The pharmacy team has adapted its working practices suitably to minimise risks to people's safety during the COVID-19 pandemic. And it knows how to protect the safety of vulnerable people. The pharmacy protects people's private information and it keeps the records it needs to.

Inspector's evidence

The pharmacy was open to the public, but people did not often visit its premises. While it was on the high street it offered its services over the internet. And the most frequent visitors to the pharmacy were delivery drivers from the pharmacy's wholesalers. The pharmacy had placed hand sanitiser at different locations in the pharmacy for the team and visitors to use. The team had a regular cleaning routine and had access to personal protective equipment in the form of gloves and masks.

The pharmacy generally supplied medicines prescribed online by one of its pharmacist independent prescribers (PIPs). The pharmacy sent its dispensed medicines to people by registered post, aiming to deliver them by the following day. The pharmacy had reviewed and improved its processes for establishing the identity of people using the service. It did this to minimise the risk of people requesting more prescription medicines than they should. The PIPs conducted audits of their prescribing service and regularly reviewed their prescribing policies and procedures to ensure that they were appropriate and safe. The inspector and PIP discussed the importance of ensuring that audits also identified all of the risks associated with prescribing for a given condition. And the importance of keeping appropriate records for each consultation.

The pharmacy team recorded its mistakes and it reviewed them periodically. But mistakes were generally rare. Even so, the PIP agreed that he and his pharmacist colleagues should review the team's mistakes more regularly. He recognised also that it was important to learn as much as possible from mistakes to help prevent them from happening again. It was agreed that records should identify what could be done differently next time to prevent mistakes and promote continued improvement. The pharmacy had standard operating procedures (SOPs) in place. All team members had read and signed their own copies of the SOPs. The responsible pharmacist (RP) had placed her RP notice on display showing her name and registration number as required by law.

People could give feedback on the quality of the pharmacy's services. And they could leave a review on the website. The pharmacy's website also gave details of the pharmacy's complaints procedure. And it provided information on how people could contact the team if they had any queries or were experiencing problems with the service. In general, the team sought feedback through its online chat facility during the online consultation process. The pharmacy team had received many positive comments from people. It had received positive comments from people who preferred not to have to visit the pharmacy to get their medicines ordered or delivered.

The pharmacy's website provided details of the local NHS complaints advocacy service and the Patient Advice and Liaison service (PALS) if necessary. But customer concerns were generally dealt with at the time by the regular pharmacists. The pharmacy had professional indemnity and public liability

arrangements so it could provide insurance protection for the pharmacy's services and its customers. It had professional indemnity and public liability insurance in place until 30 November 2021. And it had additional insurance to cover its prescribing services. It is understood that the pharmacy will renew its insurance arrangements for the following year when current insurance cover is due to expire. In general, the pharmacy kept its records in the way it was meant to. This included records for private prescriptions and the RP record. The RP recognised that the pharmacy should ensure that all of its essential records are kept in the way they should be.

The pharmacy's team members understood the need to protect people's confidentiality. Confidential paper waste was shredded. People did not generally enter the pharmacy, so people's prescription details could be kept secure. And the pharmacy posted people's medicines in plain packaging to ensure that the contents could not be identified as medicines. All pharmacists had completed appropriate safeguarding training. And dispensers had been briefed. And they knew to report any concerns to one of the regular pharmacists. The team could access details for the relevant safeguarding authorities online. But it had not had any specific safeguarding concerns to report.

Principle 2 - Staffing ✓ Standards met

Summary findings

The pharmacy team manages its workload safely and effectively. And team members support one another. They are comfortable about providing feedback to one another, so that they can improve the quality of the pharmacy's services.

Inspector's evidence

At the time of the inspection the RP worked alongside a PIP and a dispensing assistant. The PIP was also a regular pharmacist and a director of the pharmacy business. Team members had read all the relevant SOPs. And each team member had their own set of SOPs. The pharmacy had carried out an informal risk assessment for its individual team members but had not had to make any special adjustments for anyone. The pharmacy was quiet at the time of the inspection. But the RP, DA and PIP were seen to work effectively with one another. The pharmacy had a close-knit team who worked regularly together. Pharmacists were supportive of each other. And they were also able to raise any concerns with the SI.

The daily workload of prescriptions was in hand and people online were attended to promptly. The RP was able to make her own professional decisions in the interest of patients. And team members could raise concerns with the SI, PIPs, RP and their colleagues if they needed to. PIPs followed up-to-date prescribing protocols. They consulted an appropriate prescriber on a regular basis to review their protocols and ensure that their prescribing practices were appropriate and up to date.

Principle 3 - Premises Standards not all met

Summary findings

The pharmacy's website does not fully comply with GPhC guidance. And it allows people to choose a prescription only medicine before completing a consultation with a prescriber. This could mean that they may not receive the most suitable treatment option for their needs. The pharmacy provides an adequate environment to deliver it services from. And its premises are clean and secure.

Inspector's evidence

The pharmacy was in a standard retail unit on the high street. It had a small front of shop reception area with a pharmacy counter and a consultation room. The consultation room was generally used by the PIPs for online consultations. The dispensary was relatively spacious and provided three separate work benches which allowed team members to work at an appropriate distance from one another. The pharmacy also had a basement which was being refitted to provide an improved staff area with facilities. And it would also have a further work area. The premises were of an adequate size for the services provided, and they were secure from unauthorised access. The pharmacy was air-conditioned, bright, clean and modern.

The pharmacy's website generally provided all the information it needed to in line with GPhC guidance for registered pharmacies providing pharmacy services at a distance, including on the internet. But the website's layout did not fully comply with GPhC guidance. People accessed services by logging on to the pharmacy's website and selecting the treatment they required before then being presented with relevant products. This then led them through a consultation questionnaire. Satisfactory completion of the questionnaire led to a prescription and the medicine being supplied from the pharmacy. But this process deviated from GPhC guidance, which requires the consultation to come first, rather than the selection of the medicine. The website also didn't make it clear that the decision about which medicine was prescribed would be a joint decision between the prescriber and the person. With the final decision made by the prescriber to ensure that the treatment prescribed was the most appropriate.

The team cleaned the pharmacy regularly to ensure that contact surfaces were clean. And stock on shelves was stored tidily. Floors and work surfaces were clutter free and tidy. At the time of the inspection room temperatures were appropriate to keep staff comfortable and were suitable for the storage of medicines.

Principle 4 - Services ✓ Standards met

Summary findings

The pharmacy provides its services safely. And makes them adequately accessible for people. The pharmacy team gets its medicines and medical devices from appropriate sources. Team members make the necessary checks to ensure that the pharmacy's medicines and devices are safe to use to protect people's health and wellbeing. The pharmacy stores its medicines properly.

Inspector's evidence

The pharmacy's website gave its times of opening. And a description of its services. The pharmacy delivered its medicines by Royal Mail's next day tracking service, where people had to sign for their medicines when they received them. The pharmacy did not have an NHS contract but instead offered a private service for prescribing, and the dispensing and supply of medicines. PIPs conducted their consultations with people using the pharmacy's bespoke prescribing service over the internet. Each prescription request generated an appropriate questionnaire. And the PIP monitored each person's answers. Where someone's answers indicated that further intervention may be required the request was rejected. And PIPs, with the support of the other team members, were able to contact people to ensure that they were seeking medicines appropriately and help ensure that they were receiving the most appropriate care. The system did not allow people to provide different answers by taking the questionnaire a second time. The pharmacy supplied a limited range of medicines for a limited range of conditions. Focussing on lifestyle medicines. It delivered prescriptions across the UK but the majority of people using its services lived within the local area.

The pharmacy team used baskets to hold individual prescriptions and medicines during dispensing. It did this to keep prescriptions and their corresponding medicines together. And patient information leaflets (PILs) were supplied with all medicines. The RP and PIP gave people advice on a range of matters. And would give appropriate advice to people.

The pharmacy obtained its medicines and medical devices from suppliers holding the appropriate licences. The team stored its medicines, appropriately and in their original containers. Stock on the shelves was tidy and organised. The pharmacy team date-checked the pharmacy's stocks regularly. And it highlighted any items with a short expiry date. And it kept records to help it manage the process effectively. A random sample of stock checked by the inspector was close to its expiry date but had been highlighted according to the pharmacy's procedures. The team put its out-of-date and patient returned medicines into dedicated waste containers. The team stored items in a fridge as appropriate. And it monitored its fridge temperatures to ensure that the medication inside was kept within the correct temperature range. The pharmacy responded promptly to drug recalls and safety alerts. The team had not had any stock affected by recent recalls.

Principle 5 - Equipment and facilities ✓ Standards met

Summary findings

The pharmacy has the equipment and facilities it needs to provide services safely. And, it keeps them clean. The team uses its facilities and equipment to keep people's private information safe.

Inspector's evidence

The pharmacy had the appropriate equipment for dispensing and supplying medicines. Team members had access to a range of up-to-date reference sources. And they had access to PPE, in the form of sanitiser, face masks and gloves, which were appropriate for use in pharmacies.

The pharmacy had several computer terminals which had been placed at individual work- stations around the pharmacy. Computers were password protected. And team members understood that they should maintain an accurate audit trail and ensure that access to patient records was appropriate and secure.

What do the summary findings for each principle mean?

Finding	Meaning		
✓ Excellent practice	The pharmacy demonstrates innovation in the way it delivers pharmacy services which benefit the health needs of the local community, as well as performing well against the standards.		
✓ Good practice	The pharmacy performs well against most of the standards and can demonstrate positive outcomes for patients from the way it delivers pharmacy services.		
✓ Standards met	The pharmacy meets all the standards.		
Standards not all met	The pharmacy has not met one or more standards.		