

# Registered pharmacy inspection report

**Pharmacy Name:**Pharmalogic, 464 Ranglet Road, Walton Summit Centre, Bamber Bridge, Preston, Lancashire, PR5 8AR

**Pharmacy reference:** 9010938

**Type of pharmacy:** Internet / distance selling

**Date of inspection:** 23/01/2023

## Pharmacy context

The pharmacy is situated inside an industrial unit which also used for the owner's 'head office' operations. The pharmacy premises is not open to the public. The pharmacy dispenses NHS prescriptions for delivery and sells over-the-counter medicines through eBay. It supplies medicines in multi-compartment compliance aids for some people to help them take the medicines at the right time. This was an intelligence-led inspection following intelligence that pharmacy-only medicines were being sold through eBay. The inspection focussed on sales of pharmacy-only medicines, and NHS dispensing services were not inspected.

## Overall inspection outcome

### Standards not all met

**Required Action:** Improvement Action Plan; Statutory Enforcement

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
<b>1. Governance</b>	Standards not all met	1.1	Standard not met	The pharmacy cannot show it has identified the risks involved in the services provided and implemented suitable controls.
		1.2	Standard not met	The pharmacy does not have sufficient systems built in to review the service which would help to identify failings.
<b>2. Staff</b>	Standards not all met	2.2	Standard not met	People who work at the pharmacy have not completed, or been enrolled onto, pharmacy training courses.
<b>3. Premises</b>	Standards not all met	3.1	Standard not met	Pharmacy services are being provided from part of the premises that is outside of the registered area of the pharmacy. The pharmacy sells medicines via ebay using the name North Hub Limited, which is incorrect and misleading.
<b>4. Services, including medicines management</b>	Standards not all met	4.2	Standard not met	The pharmacy sells medicines with little or no professional oversight. And it cannot show it has sufficient controls in place to safeguard people who buy medicines remotely.
<b>5. Equipment and facilities</b>	Standards met	N/A	N/A	N/A

## Principle 1 - Governance Standards not all met

### Summary findings

The pharmacy does not effectively identify or manage the risks associated with its online medicine sales service. The online sales service has been set up without any professional oversight. The service operated for a period of time without any safeguards being in place to control sales. And although some safeguards were subsequently introduced these have not been properly considered or assessed to make sure they are effective. So the pharmacy cannot provide assurance that medicines are sold safely.

### Inspector's evidence

The online medicines sales service operated from an area that was separate from the main dispensary and the responsible pharmacist (RP) said he did not have any involvement with it. The service had been set up by senior management, including a company director, none of whom were pharmacy professionals. They explained that they had employed a dispenser to run the service, who apparently had some experience working for a different online pharmacy. But there had not been any involvement of a pharmacy professional. Members of the team were not aware of any standard operating procedures (SOPs) for the online sales of medicines. When questioned, a member of the team was able to describe how the medicine sales service operated. But they explained that this was a new role for them, and they had not been shown any written procedures. An SOP was provided after the inspection, but there was no evidence that any members of the team had read it.

The senior manager said he had recently identified some concerns about the way medicines were being sold. He had realised that the dispenser was not adequately controlling the quantities and types of medicines being sold. The senior manager had therefore implemented some changes to help address the risks he had identified. He had imposed a limit of one pack of medicine to be sold in a single transaction. But there had been no formal risk assessment to identify the risks associated with the service, or the individual medicines being sold. The dispenser who had been running the service was no longer employed at the pharmacy.

The pharmacy had not carried out any reviews or audits of the services. They relied upon feedback they received from people, either informally or through their complaint's procedure. Members of the team said the feedback was generally about any delays in the delivery process. Details of how to raise a complaint were described on the pharmacy's website. A current certificate of professional indemnity insurance was provided after the inspection. The responsible pharmacist was signed into the RP record. But details about who the RP was were not displayed on the website.

The pharmacy had a privacy policy on their website to describe how they handled people's data. There was a process to destroy confidential waste. But there were no safeguarding procedures in place. So members of the team may be unsure how to deal with any potential concerns.

## Principle 2 - Staffing Standards not all met

### Summary findings

Members of the team involved with sales of medicines are not pharmacy trained or on accredited training courses. So they do not have the necessary knowledge and skills to carry out their roles safely and effectively.

### Inspector's evidence

The online sales team included two customer service representatives and three people who packed and shipped the items. A separate team was responsible for the NHS services. The roles of the customer service representatives included contacting people about their orders and discussing whether the medicines were suitable for them. But neither of the representatives had completed any accredited pharmacy training. Members of the team said they would refer to the pharmacist if they had any queries. But there were no records to show when this happened.

## Principle 3 - Premises Standards not all met

### Summary findings

The pharmacy operates an online medicine sales service from an area that is not part of the registered area of the pharmacy. And when it sells medicines via ebay it displays the name of a different company. This is misleading and means people are misinformed about who is selling the medicines.

### Inspector's evidence

The pharmacy was located inside an industrial unit with offices, meeting rooms, an NHS dispensary, and a warehouse area. The pharmacy's online activity was taking place from the warehouse area, which did not form part of the registered pharmacy premises.

The premises was generally clean and tidy, and appeared adequately maintained. The size of the dispensary was sufficient for the workload. The temperature was controlled using electric heaters. Lighting was sufficient. Team members had access to a kitchenette and WC facilities.

The pharmacy's website had medicines and other sundry products for people to purchase. It displayed the details about which pharmacy was providing the service, who owned the pharmacy and the superintendent pharmacist's details. The pharmacy also sold medicines through the eBay platform. But the details about the company providing the service was displayed as 'North Hub Limited', which did not match ownership of the pharmacy. When questioned about this, the senior manager said that these details were incorrect, and it should be 'MDS Healthcare Limited'.

## Principle 4 - Services Standards not all met

### Summary findings

The pharmacy sells pharmacy-only medicines without having enough professional control to provide assurance that they are being sold appropriately. And it does not have effective safeguards to make sure the medicines are suitable for the people it supplies. So there are risks that people could obtain medicines that are not safe for them to take.

### Inspector's evidence

The pharmacy had a website, <http://www.pharmacyprime.com>, and it used the eBay platform. Details about how to contact the pharmacy were available to view on both the pharmacy's website and on eBay.

The pharmacy only sold P-medicines through the eBay platform. The customer service representatives said they would telephone anyone who requested medicines and ask questions to check whether the medicine was suitable for them. But no records were kept of these conversations. And there was no process to show how or when they would escalate requests or queries to a pharmacist. The responsible pharmacist did not directly supervise the sales of medicines.

The pharmacy did not have systems in place to identify linked accounts, such as those with the same email address, phone number or postal address. So it did not have effective safeguards in place to prevent people setting up multiple accounts to obtain larger quantities of medicines.

eBay listings had a maximum quantity such as "max 1 per order" written into the title of some of the medicines for sale, such as sleeping tablets. The team said they continued to receive orders where people had requested two or more packs of these medicines. They said when this happened, they amended the order to only supply one and refunded the difference. But the team were not able to log into the eBay account to show whether this had happened. Some records were available on the delivery software, and an example of an order was seen which requested two bottles of Night Nurse. The delivery tracking link showed it had been delivered to the delivery address provided. But the pharmacy team were not able to show how many bottles had been sent, or whether a member of the team had contacted the person.

Medicines were packaged into cardboard boxes and sent using Royal Mail 48 tracked service. A link to track the medicines was sent to the customer so they could monitor their delivery progress.

## Principle 5 - Equipment and facilities ✓ Standards met

### Summary findings

Members of the pharmacy team have the equipment they need for the services they provide. And they maintain the equipment so that it is safe to use.

### Inspector's evidence

The staff had access to the internet for general information. This included access to the BNF, BNFc and Drug Tariff resources. There was a selection of liquid measures with British Standard and Crown marks. The pharmacy also had counting triangles for counting loose tablets including a designated tablet triangle for cytotoxic medication. Equipment was kept clean.

Computers were password protected. A cordless phone was available in the pharmacy which allowed team members to move to a private area if the phone call warranted privacy.

### 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.