



Enforcement action summary - Improvement Notice Met

**Pharmacy trading name: Halliwell Midnight Pharmacy
(www.prescriptiondoctor.com)**

Pharmacy address:

34 Halliwell Road, Bolton, Lancashire, BL1 3QS

Premises registration number:

1099351

Enforcement action taken:

Issuing of an improvement notice - (Article 13 of the Pharmacy Order 2010)

Effective date:

17/10/2019

Premises standards failed:

1.1, 1.5, 1.8, 3.1 and 4.2

Summary:

An inspection of the registered pharmacy in October found five standards were failed. As well as providing traditional pharmacy services, the pharmacy also provides an online prescribing service with a prescriber who is an Italian doctor based in Romania. People can request a prescription by filling in an online questionnaire which is then assessed by the prescriber and pharmacist before the pharmacy supplies the medicine. The website offers prescription medicines for a range of conditions but mainly supplies codeine containing medicines for the treatment of pain. A number of areas were identified where the pharmacy is not operating in a way that provides safe and effective care to those patients using the services. The pharmacy did not have adequate systems in place to safeguard the welfare of vulnerable people receiving its services. Some of the systemic weaknesses are so serious, taken together, that they present patient safety risks which need to be remedied.

Improvements Required:

- a) You must provide confirmation from the prescribers regulating authority that they are specifically authorised to prescribe remotely via online consultations to people who are resident in the UK.
- b) You must ensure that the prescriber you work with is working within UK national prescribing guidelines and good practice guidance. (NICE, BNF, GMC guidance etc). For example, through clinical audits and/or risk assessments of the prescribing
- c) You must ensure that the indemnity arrangements of the prescriber you work with cover their remote prescribing activity and this cover extends to patients residing in the UK.
- d) You must ensure that the pharmacy effectively monitors and reviews all prescriptions to prevent over-ordering or misuse. You must ensure that when requests are denied because a medicine is requested 'early' for medicines liable to abuse, the prescriber will use this information to inform future prescribing decision.
- e) The pharmacy website must not allow people to choose the medicines they want before they have had an appropriate consultation with a prescriber.
- f) The consultation questions must not indicate which individual answer prevents a prescription from being issued or allow answers to be subsequently altered without the alteration being visible to the prescriber.
- g) You must ensure that the pharmacy gets all of the information it needs about people who use its services to check that the supply is safe and appropriate before the supply is made. This will include the patient's other medicines and other relevant issues. This must not be based primarily on information provided on an online questionnaire for medicines liable to abuse, over-use or misuse.
- h) When medicines supplied are liable to abuse, overuse or misuse, or when ongoing monitoring is important, you must ensure that the prescribers you work with:
 - proactively share all relevant information about the prescriptions they issue with other health professionals involved in the care of the patient (for example their GP)
 - that the prescriber contacts the GP in advance of issuing a prescription to confirm that the prescription is appropriate for the patient and that appropriate monitoring is in place
 - that the prescriber makes a clear record setting out their justification for prescribing, in circumstances where the patient does not have a GP, or does not consent to share information. This justification must be in line with the standards in GMC's Good Medical Practice (GMP) and Good Practice in prescribing and managing medicines and devices (GPPMD).

Deadline for compliance:

14/11/2019

Outcome:

Met