



**Royal  
Pharmaceutical  
Society**  
of Great Britain

## **STATEMENT ON HOSPITAL PHARMACY PRACTICE AND THE NEED TO REGISTER PHARMACY PREMISES WITH THE RPSGB**

As the pharmacy profession will be aware the Responsible Pharmacist Regulations<sup>1</sup> come into force on 1 October 2009 and replace the concept of 'personal control'.

Over the past year the Royal Pharmaceutical Society of Great Britain (RPSGB) has worked with the Department of Health and other pharmacy stakeholders including the Guild of Healthcare Pharmacists, Medicines and Healthcare products Regulatory Agency (MHRA) and hospital pharmacists to prepare for the implementation of the Responsible Pharmacist requirements.<sup>2</sup>

In preparing for the implementation of these new legal and professional requirements, it has been necessary to carefully review current working practices in both the community pharmacy and hospital pharmacy sectors.

One of the consequences of this work is that hospital pharmacists have identified that some of the services provided by hospitals require a pharmacy premises to be registered with the RPSGB and/or an appropriate licence(s) from the MHRA (for example, a wholesale dealers licence). Whether or not registration with the RPSGB or licensing by the MHRA is required will very much depend on the services that the hospital pharmacy is providing.

It is important to be clear that the need to register a pharmacy premises with the RPSGB, or to obtain a licence, is not due to the Responsible Pharmacist requirements. It is the consequence of looking at current practices which has brought to the professions attention that some services must be provided from pharmacy premises registered with the RPSGB and/or require a licence.

The RPSGB is of the view that hospital pharmacists in positions of authority, for example, Superintendents and Chief Pharmacists of Health Boards and Trusts, should carefully review the pharmacy services that their pharmacies provide in order to determine whether or not they require registration of a pharmacy premises with the RPSGB and/or whether or not they need to obtain a specific MHRA licence in order to legally continue to provide these services.

In order to assist those carrying out this review the RPSGB has produced guidance entitled '*Hospital Pharmacy Practice in the UK and the Responsible Pharmacist Requirements*': [www.rpsgb.org/pdfs/rprequirementshospguid.pdf](http://www.rpsgb.org/pdfs/rprequirementshospguid.pdf)

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<sup>1</sup> The Medicines (Pharmacies) (Responsible Pharmacist) Regulations 2008

<sup>2</sup> The Medicines (Pharmacies) (Responsible Pharmacist) Regulations 2008 and the Professional Standards and Guidance for Responsible Pharmacists ([www.rpsgb.org/pdfs/coepsgrp.pdf](http://www.rpsgb.org/pdfs/coepsgrp.pdf)).

The RPSGB strongly recommends that organisations undertake an urgent review of their pharmacy services. The RPSGB does however recognise that different hospitals provide different pharmacy services and that they may have distinct corporate governance structures. Therefore, whilst some organisations will be able to undertake this task relatively quickly, other organisations may require more time in order to properly review the position. That being said the RPSGB will expect those that are affected will use their best endeavors to register pharmacy premises, if required, as soon as practicably possible. Where registration of pharmacy premises is required applications should be submitted to the RPSGB as soon as reasonably practical and no later than the 31 December 2009.

The RPSGB appreciates that it is in the interest of patients that services affected be allowed to continue to ensure that the supply of medicines to patients is not prevented. However, if there are concerns on public health and safety grounds, the RPSGB is not in a position to provide immunity to those undertaking unlawful activities.

Pharmacies which identify a need to obtain an appropriate licence from the MHRA should ensure that they follow any such statement or guidance that the MHRA publish.