
PSI Policy on the Safe Keeping of Medicines and Associated Records during Pharmacy Cleaning and/or Merchandising

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(Reformatted in November 2020, but wording unchanged)

Introduction

The PSI Council has received requests for clarification in regard to the appropriate management of access to a retail pharmacy business (pharmacy) in circumstances where the cleaning and /or merchandising¹ of stock may be required to be undertaken when the pharmacy is closed to the public. Following consideration of the matter, the Council wishes to provide the following clarifications to pharmacy owners and pharmacists.

Background

The position is that in a pharmacy, the superintendent pharmacist, acting through the supervising pharmacist, is responsible for the management, control and safe keeping of all medicines, including those on a general sales list. The superintendent pharmacist, acting through the supervising pharmacist, is also responsible for the safekeeping of patient records, confidential information and other legal records kept in pharmacies.

Particular Circumstances

The particular circumstances for which clarification has been sought relates to situations where it is impracticable for a pharmacist to be present while necessary cleaning and/or merchandising is being undertaken outside normal opening hours and when the pharmacy is closed to the public.

Where a pharmacy owner wishes to conduct such operations in those circumstances, the following conditions must be in place and be reflected in the pharmacy's written policies and procedures:

¹ The term "merchandise" must be limited to the stocking and restocking of shelves and displays. The term "merchandise" cannot be taken to include the sale or supply of a medicinal product.

- The pharmacy must be closed, and therefore not opened to members of the public, while the necessary cleaning and/or merchandising is taking place.
- A member of the pharmacy staff reporting directly to the supervising pharmacist must be available throughout to supervise the conduct of the necessary cleaning and/or merchandising by the personnel involved. Only those personnel directly involved in carrying out these activities should be permitted to be present in the pharmacy.
- All prescription only medicines and pharmacy medicines, including those stored in controlled drugs safes, pharmacy fridges, store rooms etc. must be secured in a manner which prevents non-pharmacist personnel having access to them while the necessary cleaning and/or merchandising is being carried out.
- All patient records, confidential information and other legal records must be secured in a manner which prevents non-pharmacist personnel being able to access them during these operations.

Each pharmacy must have written policies and operating procedures setting out the arrangements to be followed when the necessary cleaning and/or merchandising is to be carried out and the pharmacy is closed to the public. This would include the procedures to be followed to ensure that:

- Access to medicines (prescription only medicines and pharmacy medicines) is and will be prevented.
- Those medicines that remain freely available on the shelves during cleaning and/or merchandising are capable of being accounted for at all times and when the operations have been completed.
- Access to patient records, confidential information and other legal records kept in the pharmacy is and will be prevented.
- Arrangements are in place to show that all staff members are familiar with and understand the importance of adhering to the controls which are in place.

The superintendent and supervising pharmacist(s), in conjunction with the pharmacy owner, are accountable for making sure that all of the above conditions are satisfied in full, and appropriately monitored, to prevent unauthorised access to medicines and pharmacy records at any pharmacy.

If you have any queries or require any further clarifications in relation to this matter, the PSI will be happy to deal with those queries to info@psi.ie