

Patient Group Direction- Information Sheet

A Patient Group Direction (PGD) is a legal mechanism that allows named registered healthcare professionals to supply and / or administer medicines to groups of patients that fit the criteria laid out in the PGD. So a healthcare professional could supply (e.g. provide an inhaler or tablets) and / or administer a medicine (e.g. give an injection or a suppository) directly to a patient without the need for a prescription or an instruction from a prescriber.

Using a PGD is not a form of prescribing.

The supply and/or administration of medicines under PGDs should be reserved for those limited situations where this offers an advantage for patient care without compromising patient safety, and where it is consistent with appropriate professional relationships and accountability.

Organisations who author PGDs have a responsibility to ensure that only fully competent and trained registered healthcare professionals use PGDs. This is why every pharmacist working under a PGD needs to be assessed as competent to use the PGD.

No element of the supply and/or administration of medicines under a PGD can be delegated.

The pharmacist working within the PGD is responsible for assessing that the patient fits the criteria set out in the PGD.

Failure to comply with the PGD could result in a criminal prosecution under the Medicines Act.

PGDs do not remove inherent professional obligations or accountability and pharmacists must exercise their own Professional Responsibility. It is the responsibility of each pharmacist to practice only within the bounds of their own competence and in accordance with the General Pharmaceutical Council Codes of Professional Conduct.

Pharmacists are reminded that they are professionally accountable to the General Pharmaceutical Council, their employers and the law.

It is important that the use of any medicine is consistent with the Summary of Product Characteristics for the relevant product and any relevant authoritative good practice guidance.

Pharmacists must ensure that they are working within the relevant, in-date PGD. Different Commissioners PGDs will differ and PGDs will be amended in each successive version.

All medication supplied must be labelled. The EC Labelling and Leaflet Directive 92/27 applies to all supplies of medicines, including those supplied under a PGD.

A patient information leaflet should be made available to patients treated under a PGD.

Names of the Pharmacists providing treatment, patient identifiers and medicine provided should all be recorded and retained for audit purposes.

- The PGD must be signed by each pharmacist working under the PGD and a copy of the signature sheet sent to the organisation that authored the PGD.
- The pharmacy must keep a comprehensive record of supply under the PGD (including patient details and medication supply).
- PGD is the legal framework for supply- retain PGD and associated records for at least 8 years or until all those who have received treatment under the PGD will be 25, whichever is the greatest.

Community Pharmacists are not directly employed by the organisation that authored the PGD; therefore each pharmacist must have his/her own relevant professional indemnity or insurance for working under a PGD.

The competency framework for individuals who work under a PGD can be accessed on P26 -28 of: http://www.npc.nhs.uk/non_medical/resources/patient_group_directions.pdf. A pharmacist working under a PGD should read these competencies to ensure that they are competent to work under the PGD.

The pharmacist working under the PGD must be aware of any change to the recommendations for the medicine listed. It is the responsibility of the individual to keep up to date with continuing professional development.

What are the responsibilities of Practitioners working under Patient Group Directions?

- Must be registered (or equivalent) members of their profession.
- Must act within their appropriate Code of Professional Conduct.
- Ensure that they are individually authorised to work under the PGD.
- Ensure that they undertake relevant training and are able to demonstrate competency to practice under PGD, providing evidence to support this.
- Ensure that they have evidence of training and competency to support their individual authorisation.
- Ensure they work within parameters of PGD and are up to date with current best practice.
- Ensure that they have their own approved copy of the PGD
- Ensure they are using the most current approved PGD and that it is in date.
- Participate in audit and PGD review processes as necessary.

Why do I have to attend a PGD training event?

Organisations who author PGDs have a responsibility to ensure that only fully competent and trained registered healthcare professionals use PGDs.

Can a locum use the PGD?

Any pharmacist using a PGD must be named and assessed as competent to do so by the organisation that produced the PGD before they can use one. Unless the locum pharmacist has undergone training with the organisation that produced the PGD they are unable to use the PGD to make a supply. This should be considered when planning leave/ holiday to ensure that any client part way through a course can complete their treatment.

If a patient falls slightly outside the criteria for inclusion in the PGD, can professional judgment be used to supply and/or administer a medicine?

No, when supplying and/or administering a medicine under a PGD, the patient must fall exactly into the criteria determined by the PGD. If not, the patient must be referred, in line with the guidelines in the PGD. Failure to comply with the PGD could result in a criminal prosecution under the Medicines Act.

Should all patients be given information leaflets with any medicine supplied?

Yes, when a medicine is supplied on prescription or via a Patient Group Direction it must legally be accompanied by the statutory patient information leaflet.

Do patients receiving medicines under a PGD pay NHS prescription charges?

Yes. Standard prescription charge rules and exemptions also apply to all patients receiving a supply of medicines under a PGD from the NHS.

The information within this briefing is based on information from the following sources:

- <http://www.nelm.nhs.uk/en/Communities/NeLM/PGDs/FAQs/What-is-a-Patient-Group-Direction-PGD/>
- <http://www.mhra.gov.uk/Howweregulate/Medicines/Availabilityprescribingandsupplyingofmedicines/ExemptionsfromMedicinesActrestrictions/PatientGroupDirectionsintheNHS/index.htm>
- http://www.npc.nhs.uk/non_medical/resources/patient_group_directions.pdf
- <http://www.nelm.nhs.uk/en/Communities/NeLM/PGDs/FAQs/What-are-the-responsibilities-of-signatories-of-PGDs/>