

Directive for Digital Activity

To all Pharmacists

4th June 2020

This directive is aimed to ensure that Pharmacists are aware of their responsibilities to ensure that online digital activity is consistent with their professional role.

This Directive is being issued by the Pharmacy Council in accordance with the provisions laid out in Article 16(d) of the Health Care Professions Act, 2003 (Cap. 464 of the Laws of Malta), which provides that one of the functions of the Pharmacy Council shall be to prescribe and maintain professional and ethical standards for Pharmacists.

Observance of this Directive is mandatory on all Pharmacists.

The Code of Ethics of the Pharmaceutical profession requires that Pharmacists, in exercising their profession, must have as their prime objective the well-being, best interest and safety of their patients.

- Pharmacists must ensure that any interaction through digital sites is in accordance to the principles laid out in the Code of Ethics for the Pharmaceutical Profession. Such interaction shall promote a high standard of patient safety and patients' rights.
- Information provided should be appropriate for the general public and factual.
- Pharmacists must ensure that interaction on digital media promotes a spirit of professional cooperation and collegiality and not a spirit of commercial and financial interest.

Pharmacists must ensure that digital sites are in conformity with the laws and regulations that are applicable to the pharmaceutical profession.

The Council reminds Pharmacists of their ethical obligations as prescribed by law. It is their responsibility to ensure that the pharmacy that they manage and all activity arising therefrom is their SOLE AND EXCLUSIVE RESPONSIBILITY and that their practice is in line with the principles enshrined at law and in the Code of Ethics at ALL times.

Definitions

Digital site: For the intents and purposes of this document, the term digital site shall be taken to mean a **Website**.

It is to be made clear that **all other forms of digital media platforms, including mobile apps, are excluded from this definition. The use of such digital media platforms is prohibited.**

The digital site must not be promoted through search engine optimisers or similar services and must also not be advertised or promoted in any way.

Status of the digital site

A digital site bearing the pharmacy name means that it effectively legally represents that pharmacy on the digital media.

The name on the digital site must not be misleading and must refer to the full pharmacy name as licenced. Any name that partially references the pharmacy will be considered as representative of the pharmacy.

It is permitted for a pharmacy to have a digital site.

A digital site incorporating a chain of pharmacies and social media sites are not permitted.

Security

A digital site bearing the pharmacy name **MUST** be secure with all the necessary safeguards and protocols being instituted to secure its integrity.

Accountability

The content of a digital site bearing the pharmacy name (partially or in full) represents that given pharmacy and is under the sole responsibility of the Managing Pharmacist.

The Managing Pharmacist must be involved in developing policies for the professional management of the digital site of the pharmacy under his/her management.

The Pharmacy Licence Holder must be informed of these obligations by the Managing Pharmacist who must ensure that these obligations are adhered to and maintained at all times.

The digital site must prominently display the pharmacy licence number assigned by the Medicines Authority and the name and registration number of the Managing Pharmacist.

Authenticity

Digital sites must be authenticated to increase patient safety. Authentication consists of the inclusion of a common national authentication logo as issued by the Pharmacy Council subsequent to application by the Managing Pharmacist. The national authentication logo is to be prominently displayed on the digital site.

Information

Pharmacists must ensure that all information posted online is factual, accurate, objective, evidence based and not misleading. Such information should be suitable for the general public and should be regularly reviewed and updated.

- All information should be presented in a professional manner.
- Sources or bases of information should be indicated and referenced.
- Conflict of interest should be acknowledged.
- All information should be in line with any applicable copyright/patent laws.

Digital site content

Information about pharmacy services must be presented in a manner which does not undermine the services of other Pharmacists or other professionals.

In promoting their pharmacy services, Pharmacists must abstain from all competition which undermines collegiality and/or misleads patients and clients.

Tactics that promote professional services at a discount, for free, or linked with offers are not accepted.

Pharmacists must not use their titles, positions, professional skills, and qualifications to induce patients to use their services.

Pharmacy services include professional services rendered by the Pharmacy such as Vaccination, Screening service, Medicines utilisation review, and Patient monitoring.

Delivery services should not be promoted as a service on the digital site.

Medicines are not ordinary items of commerce and Pharmacists must not encourage patients and clients to purchase excessive quantities such as the offering of free items e.g. buy two for the price of one, nor encourage inappropriate use or encourage purchases when not needed. The digital site should not directly or indirectly endorse, advertise or offer discount on all products available in the pharmacy.

The digital site must not include any reference to medicines, products or any other form of advertising and/or sponsorships in visual or any other format.

Approved template for a digital site

