

Pharmacy Manager Responsibilities

A licensed pharmacist assumes significant responsibilities when designated as the manager of a pharmacy. The purpose of this document is to outline these responsibilities and the expectations of Saskatchewan College of Pharmacy Professionals in their fulfillment.

When a licensed pharmacist assumes the designation as pharmacy manager, that pharmacist also assumes the duties and responsibilities of a **Director of the Corporation** as specified in clause 19(1)(b) of *The Pharmacy and Pharmacy Disciplines Act*. There are specific responsibilities of being a director of a corporation that owns and/or operates a pharmacy, such as ensuring that the corporation meets its obligations, and that it is in this area that the College has sought elaboration and clarification of these obligations.

The companion memorandum, *Directors' Duties and Responsibilities*, has been prepared by MacPherson Leslie & Tyerman, previous legal counsel to the College. The memorandum discusses certain duties and responsibilities that are owed by the directors of a corporation, incorporated under the *Canada Business Corporations Act* (the "CBCA"). Similar duties and responsibilities are owed by directors of companies incorporated under *The Business Corporations Act (Saskatchewan)*.

The pharmacy manager is the licensed pharmacist designated by the proprietor of the pharmacy to have the authority over, and be responsible for, the operation of the pharmacy. The pharmacy manager may delegate some of these responsibilities to other licensed pharmacists. These pharmacists must have an effective reporting mechanism with a clear understanding of all pertinent objectives, expectations, policies and procedures.

Under federal and provincial laws governing corporations, directors of corporations or companies owe other duties. Again, please refer to the memorandum, *Directors' Duties and Responsibilities*.

PHARMACY MANAGER'S AREAS OF RESPONSIBILITY

A. Proprietary Pharmacy Permit/Application

1. Every applicant *applying for a proprietary pharmacy permit* (i.e. a permit to operate a community or Internet pharmacy) shall:
 - a) Apply to the Registrar on the prescribed form, include the applicable fees, and provide the following information (application form available at the saskpharm.ca website: user login must be requested)
 - i. Anticipated date of pharmacy opening if new pharmacy
 - ii. Proprietor name
 - iii. Pharmacy mailing and location address
 - iv. Name of licensed pharmacist having management of the pharmacy
 - v. Names of all pharmacy employees

- vi. Names of directors, and addresses as requested
 - vii. Current Corporate Registry Profile report (or interim copy of Form 6)
 - viii. Trade name(s) of any additional pharmacies managed, in compliance with Regulatory Bylaw Part I (11): *At the discretion of the Registrar, a licensed pharmacist may be named as pharmacy manager in more than one pharmacy.*
- b) Display the permit conspicuously.

2. Change of location or cessation of business requires:

- a) Contact the SCPP office to advise of the intended date of closure
- b) Request and Review of the applicable SCPP documentation and legislation
- c) Immediately remove store signs and advertisements implying a pharmacy operation at the former location
- d) Remove Schedule I, II & III drugs
- e) Advise SCPP of the disposition of all drugs, especially narcotic and controlled drugs.
- f) Return proprietary pharmacy permit to the College within ten days of address change or closure
- g) Transfer of prescriptions to another pharmacy
- h) Alert public of closure or relocation

3. Amendments to proprietary pharmacy permit:

- a) Amended permits/applications are required for the following changes:
 - i. pharmacy manager
 - ii. proprietor name
 - iii. ownership
 - iv. trade name
 - v. director change
 - vi. location change
- b) Submit required application form, documentation and prescribed fee.
- c) If a licensed pharmacist ceases to be engaged as a pharmacy manager, the proprietor shall notify the Registrar in writing five days prior to the change, providing the name of the new manager.
- d) If the manager will be pharmacy manager at more than one pharmacy, a request for approval must be submitted to the Registrar, along with a written report on how the daily operations of the pharmacies will be managed in accordance and in compliance with SCPP legislation.

B. Narcotic and Controlled Drugs

1. The pharmacy manager:
 - a) is ultimately accountable for record keeping, the acquisition, storage and distribution of Narcotic and Controlled Drugs, according to the pertinent governing legislation.
 - b) retains the right to designate which pharmacists may have signing authority for purchasing Narcotic and Controlled Drugs in a specific pharmacy.

C. Daily Pharmacy Responsibilities

1. A licensed pharmacist may be named as pharmacy manager in more than one pharmacy.
2. The pharmacy manager shall ensure that only licensed pharmacists or interns (under the immediate supervision of a licensed pharmacist) shall practise pharmacy and shall not permit a person who is not a pharmacist to direct, influence, control or participate in the management or operation of the pharmacy.
3. The pharmacy manager shall ensure a licensed pharmacist is on duty during all hours of operation.
4. The pharmacy manager shall ensure appropriate advertising, including the correct use of the trade name of the pharmacy, prescription labels, telephone directory listings, Website, interior and exterior signs, stationary, etc.
5. The employer shall report to the College the termination of a member's employment, where the employer reasonably believes the cause is professional incompetence or professional misconduct.
6. The pharmacy manager will ensure that all pharmacy staff members have a name tag, which has as a minimum their professional designation (e.g. pharmacist, pharmacy technician, pharmacy assistant, pharmacy clerk).

D. Operational Requirements

The pharmacy manager is required to:

1. Ensure adherence to the legislation governing pharmacy practice, including, but not limited to, the following:
 - a) *The Food and Drugs Act and Food and Drugs Regulations*
 - b) *The Controlled Drugs and Substances Act*
 - c) *Narcotic Control Regulations*
 - d) *The Pharmacy and Pharmacy Disciplines Act*
 - e) Regulatory and Administrative Bylaws of the Saskatchewan College of Pharmacy

Professionals

- f) *The Health Information Protection Act (HIPA)*
 - g) *The Personal Information Protection and Electronic Documents Act (PIPEDA)*
 - h) Saskatchewan College of Pharmacy Professionals policies, guidelines and standards
2. Be responsible for establishing policies and procedures to be followed by pharmacy personnel, which are in accordance with pharmacy law, acceptable pharmacy practice and professional standards.
 3. Be responsible for the privacy of personal health information. Under amendments to the SCPP bylaws, this includes being an appropriately-trained privacy officer for the pharmacy; or designating another licensed pharmacist from the pharmacy to be the trained privacy officer.

Further details can be found in the “**Pharmacy Privacy Officer Bylaw and Interpretive Guidelines**” document located in the privacy section of the reference manual on the SCPP website: www.saskpharm.ca.

4. Be accountable to SCPP for all professional activities within the pharmacy.
5. Provide information to the Registrar concerning the operation or conduct of the pharmacy and pharmacists employed, if so required by the College.
6. Ensure a system of communication and documentation of information to provide consistency of care, which includes:
 - a) *ensure relief pharmacist has all required operational information.*
 - b) *ensure there is a pharmacist-patient interaction with each prescription and there is documentation of the interaction on the patient’s profile.*
 - c) *ensure there is a communication log book in which relevant practice information can be documented and shared with all pharmacy staff.*
 - d) *ensure there is an orientation manual for all staff to be able to reference.*
7. Ensure the prescription processes and procedures used by the pharmacy are designed to minimize errors, protect the public and adhere to the Standards of Practice.
8. Ensure a system is in place for the implementation/ maintenance of a medication error follow-up and reporting protocol.
9. Ensure an adequate staffing complement for a safe practice.

E. Written Acknowledgement

When named pharmacy manager, the pharmacist acknowledges that he or she has read, understood, and accepts responsibilities of their position and the operation of the pharmacy.

The manager shall respond in writing to requests from the Registrar (or designate) regarding operation of the pharmacy and practice situations and, where applicable, identify the member involved in any matter under review.

Questions?
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