Introduction

Due to a number of factors, there has been an increased need to use locum pharmacists in both the public and private sectors. This article has been written as a general guideline on the employment of locums with reference to professional and legal responsibilities of both locum and employer and suggested practical steps to be taken.

While this article may have a bias towards pharmacies providing patient care directly, many of the principles espoused are applicable to all other categories of pharmacies.

What is the right thing to do?

In the best interest of the patient, it is important to ensure access to good pharmaceutical care from a pharmacy that is adequately staffed, open and accessible. Adequate arrangements must also be in place for emergency service after hours. When employing a locum pharmacist, it is important that you find the right person, suitably qualified and experienced in the services which the pharmacy offers and motivated and prepared to provide the same level of care which the patients expect.

Providing good pharmaceutical care is a team effort with the pharmacist as the leader. Respect must be shown for the contributions made by each of the support personnel in the team. This should be taken into account when appointing a locum. Select a locum with the right personality, positive attitude and ability to motivate and lead the team.

What does the law say?

The Responsible Pharmacist (RP) must ensure that the pharmacy is adequately staffed with suitably qualified and appropriately experienced and trained professional staff. If short-staffed, he should appoint a locum in accordance with: Good Pharmacy Practice (GPP) Rule 3.6 Minimum Standard for Locum Tenens Pharmacists and Pharmacy Support Personnel. When a locum is appointed, the RP must ensure that the locum pharmacist is fully informed as to his responsibilities, has access to the necessary Standard Operating Procedures (SOPs) for the smooth running of the pharmacy, and basically has clear instructions to be able to fulfill his professional responsibilities.

If the RP himself is absent from the pharmacy, he must ensure that there is a suitable locum in place. Note, in particular, GPP reference: 2.1.1 Circumstances and Conditions under which a Responsible Pharmacist may be absent from his Pharmacy.

The position of RP is defined in law and the individual is registered as such with the SA Pharmacy Council (SAPC). The RP still carries the responsibility of the pharmacy although he may not be physically present. See GPP 2.1.1.2 Conditions (c) The responsible pharmacist will remain responsible to Council for any act performed by or on behalf of the responsible pharmacist, including any omission to perform an act required to be performed by or on behalf of the responsible pharmacist which may involve disciplinary action by Council.

Every healthcare professional must take personal responsibility for their own actions. However, a locum left in charge of a pharmacy in the absence of the RP is responsible for compliance with legal requirements, GPP standards and day-to-day running of the pharmacy while he is in charge. However, the level of responsibility that the locum as being the “pharmacist on duty” cannot be equated to the full, extensive responsibilities of the RP which include additional responsibilities such as human resource management, signing of legal agreements, setting up management structures, etc. Thus, the RP, whilst transferring many duties to the locum, still carries the ultimate legal responsibility, even in his absence.

What to do about it!

Getting the right person for the job!

1. Insist on an up-to-date Curriculum Vitae (CV). Any such CV should contain at least the following information:
   - Personal details including proof of registration status, PSSA membership, and personal professional indemnity insurance.
   - Professional qualifications including date of first qualifying and institute at which primary pharmacy qualification was obtained.
   - Professional development, including any additional business or pharmacy qualifications, continuing education courses attended in the last three years, computer literacy and languages spoken, written and understood.
   - Work experience and contactable references.
   - The areas and/or types of pharmacy that the locum is prepared to work in.

Note: an example of a short-form CV is available from our office, on request.

2. Use the information provided on the CV to select the correct person for the job. The basic information from the CV could be used as primary selection criteria.
However, other practical issues to consider include:

- Age or physical ability may limit the person to only working a certain number of hours per day or preclude them from certain categories of work. Is the person capable of handling the volume of work anticipated?
- Agree on rest breaks (teas and lunches) and delegation of duties to another pharmacist at these times. Single parents may need breaks at specific times of the day to attend to family matters.
- Security concerns – people may not feel comfortable working after hours, alone or travelling through certain areas. Check on the mode of transport used to get to and from work, is it reliable, is secure parking needed?
- Personality type – some people just do not have the required patience to deal with elderly patients or tolerate noisy children!
- Communication skills – most pharmacists have certain basic communication skills in dealing with patients but not all have the same confidence, knowledge or experience in dealing with other healthcare professionals.
- Is the locum qualified and capable of performing additional professional services e.g. immunisation, health screening tests, etc.

**Getting the commitment right!**

1. Request a written contract of employment. Any such contract should include at least the following:
   - A mutual agreement by the employer and the locum which includes dates, times, hours of work, period of contract, job title, job description, and place of work.
   - Engagement conditions including salary and method of calculation, rate for overtime work (if applicable), other payments (cash or kind).
   - Frequency of payment, all deductions to be made, leave or time off, travel and or accommodation allowances, out of pocket expenses, conditions and cost of purchases from the pharmacy, protective clothing, etc.
   - Conditions of cancellation of the contract and settlement of disputes.

2. Practical issues include:
   - A clear understanding that the contract is mutually binding.
   - An agreement on the role, level of responsibility and authority of the locum and relationship of the locum with other staff.
   - Does the locum have a list of duties (professional and administrative) he is expected to perform?
   - Procedures regarding purchases, other spending (even petty cash) or payment of accounts.
   - Commitment to ethical practice is a personal responsibility not to be interfered with by either party or the staff.
   - Dealing with special needs of patients (e.g. sight impaired) including complaints and referrals.
   - Detail of owner’s travelling arrangements and contacts and conditions under which he should be contacted.

**Note:** A template of a contract is available. This should also be verified with our labour lawyer (contact details available to PSSA members on request).

**Keeping the pharmacy operating smoothly!**

Locum pharmacists must have the necessary information to ensure the smooth running of the pharmacy. Basic operational information must be available, preferably in writing. This information should include the following:

1. **Staffing**
   - Names, addresses and telephone numbers of key staff
   - An organisational chart indicating staff responsibilities
   - Access to information regarding staff leave especially days off or leave due during the locum period
   - Any special needs of staff or concessions made e.g. times of work
   - Staff purchases
   - There must be a record of which registered persons were on duty at any particular time and day

2. **The dispensary**
   - Copies of all SOPs
   - Computer instructions (as applicable)
   - List of medical practitioners with telephone numbers
   - Referral procedures
   - List of outstanding work
   - Ordering systems and wholesalers/suppliers used
   - Contracted medical aids
   - Payment policies and systems used for calculation of fees
   - Special services e.g., domiciliary services
   - Keys to dispensary and Schedule 6 cupboard
   - Access control and after hour call outs, who is responsible?

3. **The pharmacy**
   - Plan of the pharmacy
   - Standard Operating Procedures
   - Cash register instructions and cashing up procedure
   - Emergency contact numbers
   - List of service suppliers e.g. electricians, computer vendors, etc.
   - Instruction for use of lights, alarm systems, computers, emergency back-up systems
   - Collection and delivery service details
   - Local map
   - Smoking policy
   - Buying policy, contact list of wholesalers and suppliers

**What you, the locum, should do**

1. Before your first day as the locum you should,
   - Re-confirm the dates and times of your bookings
   - Clarify any questions you may have, especially regarding your role and responsibilities
- If possible visit the pharmacy, familiarise yourself with the systems and nature of the work, services offered, resources available, how busy the pharmacy is, transport route to and time taken to reach the pharmacy, and meet the staff
- If possible, familiarise yourself with the SOPs of the pharmacy beforehand

2. Be personally prepared

Be professionally dressed with your own white coat and name badge
Have the necessary ID documents available including proof of SAPC registration, PSSA membership and professional indemnity
Have your own resources including pens, cell phone, and reference resources, if necessary

3. On arrival at the pharmacy... arrive early enough to get orientated

- Introduce yourself to the pharmacy team and find out about their roles, qualifications and when they work
- Locate and familiarise yourself with the company policies and standard operating procedures (SOPs)
- Receive passwords and logins for computer systems, or the till to process transactions, if needed
- Check where you can store your personal belongings
- Confirm your lunch break time, if there's no second pharmacist, check if cover will be provided from another pharmacy
- If anyone in the pharmacy team is absent, confirm if there's a contingency plan in place for lunch cover, etc.
- Check the pharmacy end-of-day procedure, and who is responsible for locking the pharmacy
- Check the procedure for recording your worked hours and invoicing (if relevant)

4. Priorities for your day once you arrive

Familiarise yourself with the layout of the pharmacy, clinic, private consultation area, S1&S2 medicines, etc.
Familiarise yourself with the location of the S6 cabinet and register, near miss error log, fridge(s), complaint / incident report forms, referral forms, dispensed medication for collection, stock arrangement, and first aid kit, clinic layout, medicines needed in an emergency e.g. adrenaline for flu or services etc.
Check if there are any people who will be collecting chronic medicine instalment prescriptions, and whether these have already been prepared for collection
Check details of collection and delivery schemes, including times when prescriptions should be collected from the surgeries and when they should be ready for collection or delivery
Check the medicine ordering procedure, cut-off times for placing orders, and expected delivery times from wholesalers
Check the procedure for checking and recording fridge temperatures, follow the SOP if it's out of range
Check if there is a list of any outstanding problems/queries that have occurred from previous days and any follow up required (a separate communications book may be useful for this). We would also recommend you keep your own personal activity log for recording any issues that arise.

5. At the end of the day

- Make sure all appropriate records have been completed including, for example, those that need to be made in the S6 register
- Check that orders have been sent to wholesalers and manufacturers as necessary
- If you're not in the next day, leave a handover briefing for the next pharmacist, highlighting any outstanding issues / interventions that took place
- Leave your contact telephone number in case the pharmacist or employer needs to contact you
- Make sure the S6 cabinet is secure and keys are stored securely overnight
- Leave the dispensary clean and tidy
- Wait until the pharmacy has been locked and secured, whether you're the key-holder or not
- Follow up the next day with the RP to check whether everything was satisfactory

Conclusion

If properly organised, the use of locum pharmacists should not be disruptive to the pharmacy service provided. It requires the employer, RP and the locum to make the effort to consider and implement the suggestions made above.

Disclaimer: This document is a guideline and does not necessarily reflect official policy of the Pharmaceutical Society of SA. Any member wishing to implement proposals made in this document, must do so in accordance with the requirements of the Pharmacy Act, Medicines & Related Substances Act and all other relevant legislation, and, if necessary, should seek legal advice to ensure compliance.

Additional information and copies of references are available on request from gary@pssacwp.co.za.

References

1. Rules relating to Good Pharmacy Practice. 4.3.6 MINIMUM STANDARDS FOR CONTINUOUS SUPPLY OF MEDICINES
2. Rules relating to Code of Conduct. 1.5 CO-OPERATION WITH HEALTH CARE PROFESSIONALS
3. Rules relating to Good Pharmacy Practice. 3.6 Minimum Standard for Locum Tenens Pharmacists and Pharmacy Support Personnel
4. Rules relating to Good Pharmacy Practice. 2.1.1 Circumstances and Conditions under which a Responsible Pharmacist may be absent from his Pharmacy.
5. Rules relating to Good Pharmacy Practice. 3.5 PROFESSIONAL INDEMNITY