



A consultation paper

**Professional Guidance for
Pharmacists in Northern
Ireland on the provision of
homeopathic products within a
pharmacy**

April 2010

STATUS OF THIS DOCUMENT

This document provides information and professional guidance to pharmacists in Northern Ireland on the sale of homeopathic products within a pharmacy.

1. BACKGROUND

The House of Commons Science and Technology Committee published a report in February 2010 on the use of homeopathy within the health service¹. Amongst its recommendations and observations were that, as pharmacists should ensure they “provide scientifically accurate advice to patients” and there being, in the Committee’s view, no scientific or clinical evidence to support homeopathy, the only advice a pharmacist could reasonably give about such products is that they are placebos.

The Committee did not, however, advocate the removal of homeopathic products from within pharmacies, but instead expressed its view that “*Although the availability of homeopathic products in pharmacies could be interpreted by patients as an endorsement of efficacy, in our view it would be pointless to seek to remove homeopathic products from sale in pharmacies. Many pharmacies sell ranges of non-evidence-based products and homeopathic products are easily available over the internet in any case. We consider that the way to deal with the sale of homeopathic products is to remove any medical claim and any implied endorsement of efficacy by the MHRA—other than where its evidential standards used to assess conventional medicines have been met—and for the labelling to make it explicit that there is no scientific evidence that homeopathic products work beyond the placebo effect.*”

This guidance has been produced in light of the Science and Technology Committee’s recommendations, existing Standards and Guidance from the Pharmaceutical Society of Northern Ireland², and the considerations of the Standards, Legislation and Practice Committee, and the Public Forum, of the Pharmaceutical Society of Northern Ireland.

For ease of use, it is presented in the form of Frequently Asked Questions.

CONSULTATION QUESTION

1) Do you consider it appropriate for the Pharmaceutical Society of Northern Ireland to publish new Guidance to pharmacists in relation to the provision of homeopathic products, as a result of the House of Commons Science and Technology Committee recent report on the matter?

¹ <http://www.publications.parliament.uk/pa/cm200910/cmselect/cmsctech/45/45.pdf>

² <http://www.psni.org.uk/professionals/code-of-ethics.php>

2. CAN PHARMACISTS SELL HOMEOPATHIC PRODUCTS IN A PHARMACY?

Yes, it is permissible for pharmacists to sell homeopathic products in a pharmacy and the right to produce homeopathic products is protected by both UK legislation and European law³. However, there is no strong scientific or clinical evidence base for the efficacy of homeopathic products other than having a placebo effect⁴⁵⁶⁷⁸. **It is therefore incumbent upon pharmacists, as publicly recognised experts in medicine, to advise patients that this is the case.**

Although it is for individual patients to make decisions about their health care, pharmacists have an important role in ensuring that these decisions are informed, and that patients have access to objective information to assist their decisions.

Pharmacists should be aware that whilst the MHRA currently licence some homeopathic products, their assessment is only for safety and quality. The MHRA licence is not an indication of efficacy.

GOOD PRACTICE GUIDANCE

Where homeopathic products are available in a pharmacy, good practice is to:

1. ensure that a patient purchasing homeopathic products is appropriately advised that there is no scientific or clinical evidence base for the efficacy of homeopathic products, beyond a placebo effect.
2. host shelf signage close to the products, recommending the patient seek further advice from the pharmacist before purchase.
3. include protocols for the sales of homeopathic products within the Pharmacy Procedures (See Responsible Pharmacist Standards and Guidance). These should include appropriate questioning of the patient's symptoms.

CONSULTATION QUESTION

- 2) Do you agree with the good practice guidance for pharmacists on the sale of homeopathic products within a pharmacy?
- 3) Are there any further good practise points which should be added?

3. ARE THERE RISKS IN SELLING AND SUPPLYING HOMEOPATHIC PRODUCTS?

Yes. The principle risk attributable to a patient choosing a homeopathic product to treat an ailment or symptom is that a serious underlying condition may go undiagnosed and not be treated

³ <http://www.mhra.gov.uk/Howweregulate/Medicines/Homeopathicmedicines/CON009377>

⁴ Ernst E (2002), "A systematic review of systematic reviews of homeopathy", *Br J Clin Pharmacol* 54 (6): 577–582, doi:10.1046/j.1365-2125.2002.01699.x, PMID 1249260

⁵ AMA Council on Scientific Affairs (1997), "Alternative Medicine: Report 12 of the Council on Scientific Affairs (A-97)", American Medical Association, <http://www.ama-assn.org/ama/no-index/about-ama/13638.shtml>,

⁶ Altunç U, Pittler MH, Ernst E (2007), "Homeopathy for childhood and adolescence ailments: systematic review of randomized clinical trials", *Mayo Clin Proc* 82 (1): 69–75, doi:10.4065/82.1.69, PMID 17285788, <http://www.mayoclinicproceedings.com/content/82/1/69.full>,

⁷ Shang A, Huwiler-Müntener K, Nartey L, Jüni P, Dörig S, Sterne JA, Pewsner D, Egger M (2005), "Are the clinical effects of homoeopathy placebo effects? Comparative study of placebo-controlled trials of homoeopathy and allopathy", *Lancet* 366 (9487): 726–732,

⁸ <http://www.parliament.the-stationery-office.co.uk/pa/cm200910/cmselect/cmsctech/memo/homeopathy/ucm3902.htm>

appropriately, thereby risking the condition needlessly becoming worse. Pharmacists must be alert to this danger and interrogate the patient's reported symptoms or health complaint accordingly. A similar risk is that a patient, having consulted appropriate health professionals and been placed on a course of conventional treatment, discontinues the prescribed therapy in preference to a homeopathic course of treatment.

Another risk is borne from patients taking homeopathic products in the belief they are effective disease preventatives. One cited example is members of the public taking homeopathic products to prevent malaria. The Health Protection Agency Advisory Committee on Malaria Prevention⁹ does not recommend that patients rely on herbal or homeopathic remedies for the prevention of malaria as there is no scientific proof that these are effective in either preventing or treating malaria. In addition, the Faculty of Homeopathy does not promote the use of homeopathy for the prevention of malaria¹⁰.

CONSULTATION QUESTION

4) Has the Draft Guidance fully and accurately described the risks in relation to pharmacies selling homeopathic products?

4. WHAT OTHER PROFESSIONAL OBLIGATIONS SHOULD PHARMACISTS BE AWARE OF WHEN SELLING HOMEOPATHIC PRODUCTS WITHIN A PHARMACY?

From the Code of Ethics for Pharmacists in Northern Ireland

Of the 8 core principles in the Code of Ethics¹¹, any pharmacist supplying homeopathic remedies to a patient should have regard in particular to their obligation to:

- Make the safety and welfare of patients their prime concern (Principle 1);
- Exercise professional judgement in the interests of patients and the public (Principle 4);
- Act with honesty and integrity (Principle 7); and,
- Provide a high standard of practice and care at all times (Principle 8)

In determining whether to supply homeopathic medicines, and the manner in which to do so, we would expect a pharmacist to use their professional judgement in light of the principles of the Code, to evaluate the risks and benefits associated with possible courses of action, and justify their actions if asked to do so.

From the Pharmaceutical Society of Northern Ireland's Standards & Guidance documents

From the suite of Standards and Guidance documents provided to pharmacists in Northern Ireland¹², any pharmacist supplying homeopathic remedies to a patient should have particular regard to the Standards for the Sale and Supply of Medicines¹³, which clearly state:

⁹ <http://www.hpa.org.uk/HPA/Topics/InfectiousDiseases/InfectionsAZ/1191942128246/>

¹⁰ http://www.facultyofhomeopathy.org/media/position_statements/malaria.html

¹¹ <http://www.psn.org.uk/documents/312/Code+of+Ethics+for+Pharmacists+in+Northern+Ireland.pdf>

¹² <http://www.psn.org.uk/professionals/code-of-ethics.php>

¹³ <http://www.psn.org.uk/documents/313/Standards+on+Sale+and+Supply+of+Medicines.pdf>

“If the pharmacy sells or supplies homeopathic or herbal medicines, or other complimentary therapies, the pharmacist must:

- *Assist patients in making informed decisions by providing them with necessary and relevant information;*
- *Ensure any stock is obtained from a reputable source;*
- *Recommend a remedy only where he can be satisfied of its safety and quality, taking into account the MHRA registration schemes for homeopathic and herbal medicines.”*

Other Standards documents remind pharmacists of a patient’s right to refuse care, treatment, or a professional service - including more established pharmaceutical treatments for ailments and conditions (Standards on Patient Consent).

The full list of Professional Standards and Guidance documents for pharmacists in Northern Ireland can be accessed from the URL below:

<http://www.psni.org.uk/professionals/code-of-ethics.php>

CONSULTATION QUESTION

5) Are there any equality impacts to the draft guidance on the provision of homeopathic products within a pharmacy that consideration should be given to?

6) Do you have any other comments, or suggestions for addition/removal, in relation to this draft guidance to pharmacists in Northern Ireland on the sale of homeopathic products in a pharmacy?

Further Information

Further information, guidance or advice on the professional or legal obligations of the pharmacy profession in Northern Ireland can be obtained by contacting the Pharmaceutical Society of Northern Ireland on 028 9032 6927 or by e-mail info@psni.org.uk.

Responding to the consultation

The consultation opened on **Friday 23rd April 2010** and will close on **Friday 18th June 2010**.

Responses can be completed online through the consultations page of the Pharmaceutical Society of Northern Ireland’s website:

Alternatively, written responses can be emailed to Richard Price, consultation coordinator at:

richard.price@psni.org.uk

or in hard copy to Homeopathy consultation, Pharmaceutical Society of Northern Ireland, 73 University Street, Belfast, BT7 1HL