

# Code of Conduct and Independence agreement

Quality Care Pharmacy Program  
August 2021

## Quality Care Pharmacy Program Code of Conduct and Independence Declaration

1. QCPP recognises Assessors are committed to promoting quality in practice to a high standard within community pharmacy. Assessors should acknowledge their responsibilities to QCPP and community pharmacy which will be demonstrated at all times by:
  - ▶ Assessors conducting themselves professionally, accurately and in an unbiased manner and adhering to high standards of ethical behaviour.
  - ▶ At all times acting in accordance with the EY Inclusion and Non-discrimination Global Policy.
  - ▶ At all times being courteous and diplomatic.
  - ▶ At all times remain impartial, fair and objective.

Being aware of privileges extended to them and not discussing or disclosing any confidential and/or sensitive commercial information that may come into their possession during the course of their duties unless required by law or authorised in writing by the client.

*Examples:*

- a) *Discussions on client information with other QCPP Assessors, QCPP National Office or EY PMO are acceptable*
  - b) *Discussions with other pharmacies are NOT acceptable*
  - c) *Comments to pharmacies about other Assessors or QCPP employees are NOT acceptable*
2. In relation to confidential and/or sensitive pharmacy information, refer to the [QCPP website - 'Protecting Personal Information'](#) information, making every effort to protect the information by:
    - ▶ At the time of assessment, requesting the pharmacy to provide redacted or de-identified evidence as specified by the assessment question.
    - ▶ Providing a non-compliant response to the assessment question and deleting any evidence that has not been redacted or de-identified as the assessment question instructs.
    - ▶ If the assessment is completed onsite and photographs are required for evidence, covering all sensitive/confidential information as far as practicable (e.g. placing a piece of paper over patient names, staff/patient contact details etc). Photos of people should not be taken under any circumstances.
    - ▶ Immediately following the assessment, checking that any submitted documentation containing sensitive information has not been saved locally in the system downloads folder (or equivalent) and ensure it is removed from both this location and the system recycle bin upon conclusion of review.
    - ▶ If there are any issues or concerns, contacting the PMO immediately.

3. Maintain Independence, avoid conflicts of interest, and notify the QCPP PMO immediately should a conflict of interest (perceived or actual) arise.

***Examples of conflicts of interest situations may include:***

- a) *Relationship with the pharmacy, or employees of the pharmacy*
  - b) *Employment (formal, contracted or consultancy) with the pharmacy within the last 2 years*
  - c) *Ethical considerations or conflict*
  - d) *Consultants promoting himself / herself to the organisation to undertake additional work or recommend any other services that he / she is involved in*
  - e) *Membership of a Board or Advisory Committee (or similar) overseeing the Pharmacy Group.*
4. Maintaining safety, security and password protection for QCPP documentation, the CRM database and other relevant software.

5. Maintaining professional standards of dress, behaviour and wearing a QCPP Assessor identification card (when at a pharmacy's premises) at all times while assessing a community pharmacy.
6. Ensuring mobile phones are switched to silent or turned off for the duration of the assessment.
7. Respecting the pharmacy's 'in-house' rules when at the pharmacy's premises (e.g. smoking policy).
8. Maintaining a high knowledge of the QCPP requirements and relevant professional standards / guidelines / legislation and not undertaking any assessments you are not competent to perform.
9. Not accepting any inducement, payments, commission, gift or any other benefit from client organisations, their employees or any interested party.
10. Not intentionally communicating false or misleading information that may compromise the integrity of any assessment, the accreditation process or any other Assessor.
11. Submitting all documentation and required actions as outlined in supporting procedures on time and in line with item 2 above.
12. Not acting in any way that would prejudice the reputation of QCPP, the accreditation process or fellow QCPP Assessors.
13. Cooperating fully with an enquiry, complaint investigation or incident investigation or in the event of any alleged breach of QCPP Assessor Code of Conduct, QCPP assessment procedures or QCPP accreditation rules.