

On June 12, 2024, the Council of the Alberta College of Pharmacy (ACP) amended the [Standards of Practice for Pharmacists and Pharmacy Technicians](#) and [Standards for the Operation of Licensed Pharmacies](#) to provide direction on the provision of personal services in the context of the practice of pharmacists and pharmacy technicians and in the operation of licensed pharmacies. The new standards were developed and approved based on ACP's mandates under the [Health Professions Act](#) to

- regulate pharmacists and pharmacy technicians in a manner that serves and protects the public interest,
- and establish and maintain standards of practice for regulated members.

They will come into effect on February 1, 2025.

Under the *Health Professions Act*, provisions related to “protected title” make clear that the use of a professional title like pharmacist or pharmacy technician is intended to convey that one is a member of a regulated profession. Use of a protected title suggests that one is qualified to provide the services one is offering and is regulated by their profession in respect of those services.

There is **no legislative basis** for a regulated member of the ACP to provide a personal service within their practice as pharmacist or pharmacy technician or to hold out that they are capable of doing so.

Pharmacists and pharmacy technicians provide health services, including restricted activities, within the practice of their profession as established by practice statements within Schedule 19 of the *Health Professions Act*. “Health services,” as defined in the Act, means a service provided to people to protect, promote, or maintain health; to prevent illness; to diagnose, treat or rehabilitate; or to take care of the health needs of the ill, disabled, injured, or dying.

“Personal services,” which focus on enhancing, preserving, or altering a person’s appearance, are governed under the [Personal Services Regulation](#) adopted and enforced by the Government of Alberta. The Personal Services Regulation distinguishes “personal services” from “health services.”

The new Standards are as follows:

Standards of Practice for Pharmacists and Pharmacy Technicians

4.3.2 A regulated member must not hold themselves out as a regulated member in a manner that is capable of misleading or misinforming the public when providing services that do not fall within the practice of their profession, including services that

- a) fall under the Personal Services Regulation; or*
- b) are not provided as a health service to a patient.*

Comment

When regulated members hold themselves out as pharmacists or pharmacy technicians in the provision of personal services, the public may reasonably assume that they are qualified as pharmacy professionals to provide those services, are subject to standards of practice in relation to those services and are regulated by the ACP in the provision of those services. The concern is that use of a protected title may be capable of misleading or misinforming because the title does not mean that the individual is qualified to provide personal services. ACP does not regulate who is qualified to provide personal services or the standards under which they are provided. That is the role of the Government of Alberta.

A patient is often in a vulnerable position in the professional relationship and is required to place great trust in the advice and services received from the professional. When a regulated member uses their protected title to hold out that they are able or trained to perform personal services that fall outside of the practice of pharmacy, they create a potential confusion between those communications and their regulated professional identity.

This standard protects the public interest by ensuring that regulated members do not engage in advertising that is untruthful, inaccurate, or otherwise capable of misleading or misinforming the public.

7.7.3 *A regulated member must not*

- a) *administer an injection for*
 - i. *aesthetic purposes in their capacity as a regulated member;....*

Comment

When regulated members engage in restricted activities under the *Health Professions Act*, members of the public can, based on the terms of the Act, reasonably expect that

- the restricted activity is provided in the context of a health service,
- only appropriately qualified regulated members will engage in each restricted activity, and
- the performance of the restricted activity by a regulated member is governed by standards of practice adopted by the ACP.

“Personal services” under the Personal Services Regulation include procedures that resemble certain restricted activities, namely puncturing and applying or injecting cosmetic products. However, as discussed above, these are not part of the practice of regulated members and are not health services. These personal services can include risky procedures which do not form part of the training of pharmacists and pharmacy technicians, including the injection of drugs and cosmetic fillers for aesthetic purposes. The training that pharmacists receive to administer injections in a health care context is not sufficient to safely inject botox or fillers in an aesthetic context.

Standards for the Operation of Licensed Pharmacies

4.13 *A licensee or proprietor does not permit services that fall under the Personal Services Regulation to be provided from a licensed pharmacy.*

Comment

Pharmacies are licensed under the *Pharmacy and Drug Act* as part of the regulatory system that governs the provision of pharmacy services by regulated members practicing their professions. Personal services under the Personal Services Regulation are not pharmacy services and not regulated by the ACP. If personal services are provided in licensed pharmacies, the public may be misled or misinformed into believing that they fall within the scope of pharmacy services and subject to standards and the regulation of the ACP.