
PHARMACY REGISTRATION BOARD OF WESTERN AUSTRALIA

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Communiqué

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With the introduction of influenza vaccination within pharmacy premises, the Board considers it timely to remind all pharmacy proprietors of the requirements when significant alterations are undertaken within pharmacy premises.

Regulation 14 of the Pharmacy Regulations 2010 ("Regulations") states as follows:

- (1) *The pharmacist with overall responsibility for a pharmacy must not cause or permit any significant alteration to be made to the pharmacy without the prior written approval of the Board.*
Penalty: a fine of \$1 000.
- (2) *The pharmacist with overall responsibility for a pharmacy must make application to the Board for approval to make significant alterations to that pharmacy at least 2 months before the commencement of the alterations.*
Penalty: a fine of \$ 500.

The definition of a significant alteration under the Regulations is:

an alteration to the pharmacy that affects the construction, structure, layout or floor area of the pharmacy.

To clarify the Board's view as to what constitutes a significant alteration, the Board's guidelines state:

The Board considers that a significant alteration is any alteration to the pharmacy that affects:

1. *the construction of any part of the premises;*
2. *the structure of any part of the premises;*
3. *any entry to or exit from the premises, including the way the general public accesses any entry or exit;*
4. *the layout or floor area of the area(s) for private consultation, including access to or from the area(s) and refurbishment of the area(s);*
5. *the layout or floor area of the professional services area(s), including access to or from the area(s), the storage area(s) for scheduled medicines and refurbishment of the area(s); and*
6. *the layout or floor area of the dispensary, including access to or from the dispensary or the ability of a pharmacist working in the dispensary to supervise the storage, sale or supply of Schedule 2 and Schedule 3 medicines.*

The Board notes that the Department of Health's Pharmacist Vaccination Code has the following Pharmacy Premises Requirements:

Vaccine administration by pharmacists is to be conducted at a pharmacy premises registered under the Pharmacy Act 2010.

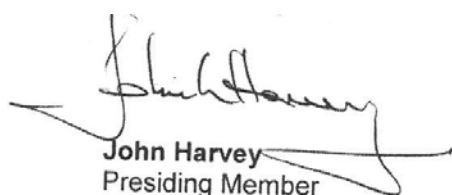
Pharmacy premises are to have minimum facilities and staffing resources that include:

- *A screened area or private room that ensures patient privacy and confidentiality, including during verbal discussions with:
 - *sufficient space to allow the presence of the patient, a carer (if applicable), pharmacist vaccinator, consumables, equipment and documentation*
 - *seating for the patient and their carer during the vaccination*
 - *sufficient space and appropriate surfaces for the patient to lie down in the event of an adverse reaction and for staff to safely perform resuscitation procedures..**
- *an area that affords direct visual observation with sufficient seating where patients can wait for at least 15 minutes following vaccination*
- *hand washing facilities to allow performance of appropriate hand hygiene before and after vaccine administration*
- *sufficient staffing to ensure patient safety in post-vaccination monitoring and adverse event management, including dedicated vaccinators and a minimum of two pharmacists during vaccination service periods.*

The Board's view is that the area for private consultation as defined in the Regulations should not be utilised for vaccinations being undertaken in pharmacy premises, unless another area is made available at all times for pharmacy related consultations.

As per the Board's guidelines, the Board views changes to areas for private consultations as significant alterations and accordingly would require an Application for Significant Alterations to be made to the Board.

The Board is also aware that vaccinations are being undertaken in pharmacies by persons other than pharmacists, such as nurse practitioners and medical practitioners. The Board's preliminary inspections of such arrangements seems to indicate that changes are being made to pharmacy premises to accommodate this new service. Such changes appear to impact on the area for private consultation, the layout of the professional services area, or access to or from the dispensary. In these circumstances the Board would consider this to be a significant alteration (even if temporary) and would require an Application for Significant Alterations to be made to the Board, prior to such arrangements being put in place.



John Harvey
Presiding Member