

Guidelines on Patient Consultation Areas in Retail Pharmacy Businesses

to Facilitate Compliance with Regulation 4(3) of the Regulation
of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008)

Pharmaceutical Society of Ireland

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1. Introduction

The purpose of these guidelines is to outline the legal requirements for a consultation area in a Retail Pharmacy Business and the standard expected by the PSI.

It is widely accepted that communicating the correct information and advice to patients is as important as providing the medicine itself and the World Health Organisation (WHO) states that patients should feel able to express a need and be assured of confidentiality about their illness and treatment when receiving pharmacy services¹.

Facilities for confidential conversation between a pharmacist and a patient about their medication and general health matters, that cannot be overheard by others, are also recognised as an essential element of 'Good Pharmacy Practice' by the International Pharmaceutical Federation². The requirement to have a consultation area, within a pharmacy, already exists in many countries including Scotland, The Netherlands and Australia. It is widely recognised that patient consultation areas are a beneficial resource for patients. The availability and use of such areas aims to improve patient confidentiality and ultimately patient outcomes.

A patient consultation area that is correctly designed and used allows the patient and the pharmacist to interact in a setting that respects the privacy of the patient. The patient consultation area, when used to discuss medication and other health issues, enhances the professional interaction and relationship between the patient and the pharmacist. It also facilitates and encourages patients to request and avail of the professional input and counselling they require from the pharmacist. In addition, a designated area within a pharmacy, specifically for patient consultation, will enable the pharmacist to become a more

integral part of the multidisciplinary team involved in a patient's care. The confidential and personal nature of a consultation, within a consultation area, has huge potential to improve patients' health by increasing patient education, encouraging the appropriate and rational use of medication, and thus reducing medication-related problems.

Since 1996 there have been contractual requirements, in Ireland, for pharmacists to have a consultation area in place. However, since the introduction of the Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008) in November 2008, all retail pharmacy businesses are now required by law to provide a separate, designated, conveniently located area for patient consultation within the pharmacy premises. In view of the statutory requirement for such an area, a transition period was provided for retail pharmacy businesses already in existence at the coming into force of the regulations, until 1st November 2010.

1 Wiedenmayer et al., 2006, Wuliji, T. et al., 2005.

2 FIP, Good Pharmacy Practice Guidelines, 1997.

2. Legislative Basis

The operation of a retail pharmacy business is governed by the Pharmacy Act 2007 and the Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008).

These regulations have been made by the Minister for Health and Children under Section 18 of the Pharmacy Act 2007, for the purposes of the health, safety and convenience of the public. Retail pharmacy business owners and superintendent pharmacists are required to conduct their retail pharmacy business in compliance with this legislation.

Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008), Regulation 4 (3):

“The pharmacy owner shall provide a separate and designated area conveniently located within the pharmacy premises so that a pharmacist may review and discuss in private with the person for whom a prescription has been issued, or with the carer of such a person, such matters relating to the medicine therapy as either of the said persons may request or as the pharmacist, in the exercise of his or her professional judgment, may deem necessary.”

These guidelines have been written in accordance with Regulation 14 of the Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008). This particular guideline seeks to facilitate compliance with Regulation 4(3).

Pharmacists must be cognisant of their obligation to review and offer to discuss each prescription with a patient and their obligation to ensure a patient is aware of the appropriate use of a non-prescription medicinal product as set out in Regulations 9 and 10 of the Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008). There must be a separate, designated consultation area available so a pharmacist can discuss matters relating to a patient’s medicine therapy in private. The patient or carer may request such a discussion or the pharmacist may, in the exercise of his or her professional judgement, deem such a discussion necessary.

3. Guidance

3.1. Privacy

The area must be constructed so as to ensure a reasonable level of privacy for the patient, i.e. any discussion between the pharmacist and the patient, when speaking at a normal volume, should not be overheard by others.

In addition, the patient should be provided with appropriate visual privacy, for example, for the demonstration of medicinal products and/or medical devices to the patient.

Visual and sound barriers can be used to ensure the above criteria are met. However, it is not necessary to create an enclosed room to achieve an appropriate level of privacy.

3.2. Separate and Designated

The patient consultation area must be a designated area and, therefore, used solely by the pharmacist for the purpose of patient consultation and counselling. The area should not be used for other purposes, e.g. the storage of medicines or excess stock.

The area should not be the only access route to other areas of the pharmacy, e.g. a storeroom, bathroom or the dispensary³.

There must be a sign in place which informs patients that the facility exists and is available for their use, should they wish to request the professional input of the pharmacist. Each retail pharmacy business should also have a written policy and procedure which encourages and trains staff to direct patients to the consultation area and inform them of their entitlement to a private consultation.

3.3 Conveniently Located

The area must be conveniently located. It should be easily accessible to the patient and the pharmacist and ideally be close/adjacent to the dispensary and non-prescription medicines area. There should be direct access for the patient from the public area of the pharmacy.

A convenient location will help to ensure that the consultation area is availed of more frequently and will allow patient-pharmacist interactions to take place in an environment that respects a patient's dignity and privacy and enhances the professional role of the pharmacist.

3.4 Size and Accessibility⁴

The area must have sufficient space and facilities to allow the pharmacist, the patient and/or their carer, guardian or chaperone to be seated. The area must be accessible to all patient profiles, including patients with disabilities, e.g. the area must be wheelchair accessible.

3.5 Fixtures and Fittings

The area should be fit for purpose. It should be finished and furnished to a high standard to reflect the professional nature of the area.

The equipment available should allow for counselling and demonstration of the correct and safe use of medicinal products and medical devices, as required. There should be a table or worktop in the room to facilitate such demonstrations and, for example, the writing of notes by patients or their carers.

3 Where the consultation area is one of a number of access routes to another area of the pharmacy, there should be robust policies and procedures in place which ensure patient consultations are not disturbed and the privacy of the patient is maintained.

4 Exceptions and/or exemptions may be made regarding the size requirements of the consultation area in exceptional circumstances, where deemed appropriate by the PSI. An exemption will only be considered for retail pharmacy businesses already in existence at the coming into force of the regulations, i.e. 29th November 2008. The pharmacy must supply detailed documentation to support any request for an exemption. Where an exemption from the size requirement is granted, all other consultation area requirements must be fulfilled.

3.6 Supervision

All legal and professional obligations must be considered when planning and constructing the consultation area. The pharmacy layout must be appropriate, adequate pharmacist personnel must be available and robust policies and procedures must be in place to allow for the required supervision of any preparation, dispensing, compounding, sale or supply of medicinal products, including counselling in such sale or supply. The pharmacy owner, superintendent and supervising pharmacists must ensure the availability of adequate pharmacist personnel to fulfil all requirements outlined in the legislation.

3.7 Security

The security and safety of the patient and the pharmacist is paramount. The consultation area should not be used when, by entering the area, there is deemed to be a potential risk to the personal safety of a patient, pharmacist or another staff member. In order to maintain clear professional boundaries with patients, pharmacists may consider the use of a chaperone.

The use of security features such as CCTV cameras or panic buttons can be considered in the area. Patients must be informed of the presence of visual recording devices in the consultation area and the use of this equipment should be accompanied by robust protocols and procedures to ensure patient confidentiality is maintained. Sound recording is not recommended and should not be undertaken without written consent from patients and others present during a consultation.

3.8 Additional or Extended Pharmacy Services

Consultation area use, and therefore requirements, will vary depending on the services provided by the pharmacy. The regulatory requirement is that, at a minimum, the area allows for private discussions between the pharmacist and the patient on medication and health issues. If a pharmacy currently provides additional services such as health screening and monitoring services, or may consider providing such services in the future, there will be additional requirements for an area that can facilitate these services. This includes the degree of privacy required, the size of the area and the equipment requirements. For further guidance on the requirements for premises providing such services please consult the PSI's *Guidance on the Provision of Testing Services in Pharmacies*.

Please note if a pharmacy is engaged in Point of Care Testing on a large scale or volume it is necessary that a separate area be provided for this.

4. References

- Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008).

- Wiedenmayer, K., Summers, R.S., Mackie, C.A., Gous, A.G.S., Everard, M. & Tromp, T.F.J. (2006). Developing pharmacy practice – A focus on patient care. Geneva: World Health Organization.

- Wuliji, T., Airaksinen, M. (eds.) (2005). Counselling, concordance, and communication: innovative education for pharmacists. The Hague, The Netherlands: International Pharmaceutical Federation Pharmacy Information Section and International Pharmaceutical Students' Federation.

- Standards for Quality of Pharmacy Services. Good Pharmacy Practice. International Pharmaceutical Federation (FIP), 1997.

Relevant legislation can be accessed through the PSI website www.thePSI.ie, and is also available from www.irishstatutebook.ie.

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1	May 2010
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5. Self-assessment Checklist

This self-assessment checklist is a practical tool intended to aid compliance with the important elements of these guidelines and to assist superintendent and supervising pharmacists in drawing up the relevant policies and SOPs. The checklist captures many important elements of the guidelines; it is not exhaustive and should only be used to assess pharmacy practice in combination with these guidelines and all other relevant guidance and requirements.

Ask Yourself	Yes	No	N/A	Required Action
Is there a designated area located within the pharmacy that can be used for patient consultations, which is easily accessible to patients?				
Is the area accessible to all patient profiles, including those with disabilities?				
Is the area private i.e. any discussion between the pharmacist and the patient, when speaking at a normal volume is not overheard by others?				
Is the area visually private for the patient?				
Does the area contain sufficient space and facilities for use, including seats, a table or worktop?				
Is the area kept free from excess stock and clutter, and only used for patient consultations and counselling purposes?				
Is there a visible sign which informs patients that the facility exists and that it is available for their use?				
Are staff trained to inform patients of their entitlement to a private consultation and to direct them to the consultation area if requested?				

