



DRAFT GUIDELINES ON PATIENT CONSULTATION AREA

**to facilitate compliance with Regulation 4(3)
of the
Regulation of Retail Pharmacy Businesses
Regulations 2008
(S.I. No. 488 of 2008)**

PUBLIC CONSULTATION DOCUMENT

Comments are welcome in writing to consultation@pharmaceuticalsociety.ie or to
Public Consultation, Pharmaceutical Society of Ireland,
18 Shrewsbury Road, Ballsbridge, Dublin 4

This period of public consultation will end at 5.00pm on Tuesday, 06 April 2010

INTRODUCTION AND BACKGROUND

It has been accepted that communicating the correct information and advice to patients is as important as providing the medicine itself, and the World Health Organization (WHO) states that patients should feel able to express a need and be assured of confidentiality about their illness and treatment when receiving pharmacy services (Wiedenmayer, T. et al, 2006; Wuliji, T. et al, 2005).

Facilities for confidential conversation between a pharmacist and a patient about their medicines 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 Federation (FIP, Good Pharmacy Practice Guidelines, 1997). Therefore the requirement to have a consultation area within a pharmacy already exists in many countries, including Scotland, The Netherlands and Australia, and it is widely recognised that patient consultation areas are a beneficial resource for patients in a pharmacy setting, aiming to improve patient confidentiality and patient outcomes.

A patient consultation area that is correctly designed and utilised allows the patient and the pharmacist to interact in a setting that respects the privacy of the patient and enhances the professional interaction and relationship between the patient and the pharmacist, on medication and other health issues. It also facilitates and supports patients in requesting and availing 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 and medication compliance and thus reducing medication-related problems.

Previously in Ireland, there have been contractual requirements for pharmacists to have a consultation area in place. However, since the introduction of the Regulation of Retail Pharmacy Businesses Regulations in November 2008, all retail pharmacy businesses are now required to provide a designated area for patient consultation within the premises. A transition period was granted for retail pharmacy businesses already in existence at the coming into force of the regulations, until 1st November 2010.

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. 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 the retail pharmacy business in compliance with these regulations.

These draft guidelines have been written in accordance with Regulation 14 of the Regulation of Retail Pharmacy Businesses Regulations 2008, which allows the PSI Council, with the prior approval of the Minister, publish detailed guidelines to facilitate compliance with the Regulations. These particular draft guidelines seek to facilitate compliance with Regulation 4(3).

Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. 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 judgement, may deem necessary.'

GUIDANCE ON REQUIREMENTS

1 PRIVACY

The area must be constructed so as to ensure a reasonable level of privacy for the patient, at all times, 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 visual privacy of the patient should be considered and the pharmacist should be in a position to demonstrate medicinal products and/or medical devices to the patient without being overseen.

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

2 SEPARATE AND DESIGNATED

The patient consultation area should 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 an access route to other areas of the pharmacy, e.g. a store-room, bathroom or the dispensary.

There should 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 written policy and procedures, which encourage and train staff to direct patients to the consultation area and inform them of their entitlement to such a facility.

3 CONVENIENTLY LOCATED

The area should be conveniently located and easily accessible to the patient and the pharmacist and therefore should 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.

4 SIZE

The area must have sufficient space and facilities to allow the pharmacist, the patient and/or their carer or guardian to be seated.

The area must be accessible to all patient profiles and therefore must be wheelchair accessible.

5 FIXTURES AND FITTINGS

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

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

6 SUPERVISION

The pharmacy layout must be appropriate, and adequate pharmacist personnel must be in place to allow for the required supervision of any preparation, dispensing, compounding, sale or supply of medicinal products. This should be considered when planning and constructing the area. The superintendent and supervising pharmacists should consider the availability of other pharmacists to fulfil these and other requirements as envisaged under the legislation.

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.

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 these devices in the consultation area.

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 '*Guidelines for Safe and Effective Management and Use of Point of Care Testing in Primary and Community Care*'.

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, so that the patient consultation area is always available for its intended purpose.

GENERAL REFERENCES

- Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008).
<http://www.pharmaceuticalsociety.ie/Publications/Publications/Legislation.html>
or
<http://www.irishstatutebook.ie/home.html>
- *Guidelines for Safe and Effective Management and Use of Point of Care Testing in Primary and Community Care, 2009.*
<http://www.pharmaceuticalsociety.ie/Publications/Publications/Navigation.html>
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- *Standards for Quality of Pharmacy Services. Good Pharmacy Practice.*
International Pharmaceutical Federation (FIP), 1997.
http://www.fip.org/?page=menu_goodpharmacypractice