

ACT COMMUNITY PHARMACY INSPECTION GUIDE

A risk-based approach to community pharmacy inspections in the ACT

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Introduction

The Health Protection Service (HPS) monitors the use of medicines, poisons and therapeutic goods in the ACT community to ensure public safety. Inspectors from the HPS conduct a range of regulatory activities to ensure that medicines and poisons are prescribed, stored and supplied in accordance with relevant legislation.

Purpose

This Community Pharmacy Inspection Guide (Guide) has been developed to ensure a consistent, risk based and transparent approach to community pharmacy inspections. The Guide is designed to assist both inspectors and pharmacists on community pharmacy inspection processes, criteria and enforcement actions. The Guide should be read in conjunction with the <u>Public Health Act 1997</u> (PH Act), the <u>Medicines, Poisons and Therapeutic Goods Act 2008</u> (MPTG Act) and the <u>Medicines, Poisons and Therapeutic Goods Regulation 2008</u> (MPTG Regulation).

Community Pharmacy Legislation

In the ACT, a community pharmacy must be licensed according to the PH Act and must comply with the requirements of the <u>Public Health (Community Pharmacy) Code of Practice 2016</u>.

In addition, the MPTG Act and MPTG Regulation, including legislative instruments such as the Medicines, Poisons and Therapeutic Goods (Guidelines for Treatment of Opioid Dependency)

Approval 2018 (No 1) and Medicines, Poisons and Therapeutic Goods (Vaccinations by Pharmacists)

Direction 2022 (No 1), establish authorisations and requirements to deal with medicines and poisons.

To ensure that community pharmacies comply with their ACT legal requirements, the HPS performs routine pharmacy inspections. Inspections can occur at any reasonable time and without prior notice.

Compliance assessment

During community pharmacy inspections, Medicines and Poisons Inspectors use the Pharmacy
Premises Inspection Form and Opioid Dependency Treatment (ODT) Inspection Form (for ODT licensed pharmacies only) (Appendix A and Appendix B). These forms contain inspection criteria that relate to the legislative requirements under the PH Act and MPTG Act.

Medicines and Poisons Inspectors use a risk-based approach to assessing pharmacy compliance against each of the inspection criteria. A <u>Consequence Table and Risk Matrix</u> has been developed at Appendix C to define a level of risk that may be applied to instances of non-compliance during an inspection. Risk levels correlate with the potential risk to public health arising from the non-compliance, as summarised in table 1.

Table 1: Non-compliance risk level correlation to public health risk.

Level of Risk	Description
Low Risk	Does not pose an imminent risk of harm to public health.
Medium Risk	Does not pose an imminent public health risk but does require correction (may become an imminent public health risk if not corrected within specified timeframes).
High Risk	May cause harm to public health and requires immediate rectification.
Extreme Risk	Poses an imminent, serious public health risk that requires immediate rectification and may require immediate enforcement action.

Scoring system

During an inspection, a pharmacy can be deemed compliant, non-compliant, critically non-compliant or not applicable against each of the criterion on the Pharmacy Premises and/or ODT Inspection Forms. If a pharmacy is deemed non-compliant against a criterion, then a level of risk is determined for the non-compliant issue using the Community Pharmacy Risk Assessment Tool at Appendix D.

Each risk level is then given a score of non-compliance as below:

Level of Risk	Score	Level of Risk	Score
Low Risk	1	High Risk	6
Medium Risk	2	Extreme Risk	18

At the end of the inspection, the Total Non-compliance Score (TNS) is calculated by adding the total scores for all non-compliant issues identified against the criteria on the Pharmacy Premises Inspection Form and/or ODT Inspection Form.

Total non-compliance score	Overall Inspection Result
5 or less	Compliant
Between 6 and 17	Non-compliant
18 or greater	Critically Non-compliant

If the TNS is five or less, the pharmacy will be given an Overall Inspection Result as Compliant on the inspection form. Any minor issues that require attention will be recorded by the Inspector on the form for the pharmacy's action. For example, if a pharmacy has two low risk non-compliances the TNS for the pharmacy would be 2 and the pharmacy will be deemed overall Compliant, with minor issues recorded on the form. A follow up inspection is not required in these circumstances. The pharmacy will be provided with a copy of the inspection form.

If the TNS is between 6 and 17, the pharmacy will be deemed non-compliant and, in most cases, served an Improvement Notice. For example, if a pharmacy has two medium risk and two low risk non-compliances, the TNS for the pharmacy would be 6 and the pharmacy will be deemed overall Non-Compliant. The Inspector will serve an Improvement Notice on the pharmacy that outlines areas of non-compliance to rectify within a specified timeframe, with a copy of the inspection form.

An Improvement Notice is an enforcement tool issued under the PH Act that directs a pharmacy to undertake a corrective action in relation to a breach of their legislative requirements. For example, if one of the factors contributing to a high TNS is that the name of the Pharmacist in Charge in the premises was not displayed, an Improvement Notice may be issued to direct the pharmacy to display the name of the Pharmacist in Charge and all persons practicing as a pharmacist by a specific date.

An Improvement Notice is not a punitive measure, however there are potential consequences for a pharmacy not following up with actions required of the Notice.

A follow up inspection will be conducted around the due date of the Notice to determine compliance. The inspector will issue a Revocation Notice¹ if they are satisfied that the Improvement Notice has been complied with in full. If the pharmacy has not complied with the Improvement Notice, the inspector will refer the matter to senior staff within the HPS who will consider further actions.

If the TNS is 18 or above the pharmacy will be deemed Critically Non-Compliant and the matter will be referred to senior staff within the HPS to consider further enforcement options or measures to mitigate harm to public health. For example, if a pharmacy has one extreme risk non-compliance, the TNS for the pharmacy would be 18 and the pharmacy will be deemed Critically Non-Compliant. As a result, the HPS may take enforcement action up to and including closing the pharmacy under a Prohibition Order, varying or suspending the pharmacy's licence, disciplinary actions against a pharmacist, referral to the Australian Health Practitioner Regulation Agency or commencing a prosecution.

ACKNOWLEDGMENT OF COUNTRY

ACT Health acknowledges the Traditional Custodians of the land, the Ngunnawal people. ACT Health respects their continuing culture and connections to the land and the unique contributions they make to the life of this area. ACT Health also acknowledges and welcomes Aboriginal and Torres Strait Islander peoples who are part of the community we serve.

ACCESSIBILITY

If you have difficulty reading a standard printed document and would like an alternative format, please phone 13 22 81.



If English is not your first language and you need the Translating and Interpreting Service (TIS), please call 13 14 50.

For further accessibility information, visit: www.health.act.gov.au/accessibility

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¹A Revocation Notice is legal document that means that the original Improvement Notice has been revoked.



Community Pharmacy ACT Health Premises Inspection Form

Health Protection Service 25 Mulley Street Holder ACT 2611 P: 5124 9208 F: 5124 9309

		Sovernment.							_	5 Weston Creek A 111 hps@act.gov	
Pre	mises Deta	ils									
Trac	ding Name	:				Date:		/ / Sta	rt Time:	am/pm	
Pre	mises Add	ress:					_	File	No:		
Pro	prietor/Lic	ensee:									
Lice	nce/Regis	tration Num	iber:			Licence	e/R	egistration Expiry Date:			
		nducted wit			_	_					
Pos	ition: Prop	rietor 🗆 N	Manager D Perso	on in Cha	rge 🗆	Other 🗆:					
Insp	ection Typ	e: Schedul	ed 🛘 Follow Up	☐ Com	plaint 🗆	New Licens	ce/l	Registration Refurbishmen	t 🛘 Other 🗎		
								997 and the Medicines, Poisons a	,		
	- Compli rmacy Pre		Risk Non-complia	ince (NC)) M-N			H – High Risk NC E – Extreme e of Controlled Medicines	Risk NC N/A - No	nt Applicable	
							-				
1			direct public acces		\rightarrow	18	-	Appropriately stores controlle			
2			least eight square		\rightarrow	19	_	Compliant controlled medicine		de	
3	_		ing space in dispe		\rightarrow	20	-	storage receptacle locked on i		\longrightarrow	
4	Pharmac	y appropria	ately ventilated an	ıd hygieni	ic	21	1.	Storage receptacle key/combin controlled	nation appropriat	ely	
5	Adequat	e lighting				22	1	Controlled medicine register st	tored on premise	5	
6	Pharmac	ist able to s	supervise shop add	equately	\neg	23	1	Controlled medicine register e	ntries up-to-date		
7			ent for extempor		\neg	24		Controlled medicine balances			
	preparat				- 1		•	Controlled Medicines Report)	•		
8			lling facilities		\neg	Sto	_	e of Medicines requiring Refri	eeration	يندر يسيم	
9			gent communicat	ions	\neg	25	_	Dedicated refrigerator for stor		edicines	
	duct of Bu		5			26	_	Appropriate monitoring of ten			
10			y under the contro	ol of				ising of Medicines	iperature.	فسيسا	
_	ı		en for business	01 01		27	-	Appropriate labelling of prescr	intion medicines		
11	_		f all practising pha		. +	28	-	Appropriate recording of dispe			
12					+	29	-			- and the	
		che display of Friantiacise in Ghange		30	receptione/research prescription rollowed up adequately						
цев		version of t				31	-				
		version of the			-	32					
			he TG or e-TG		-		Vaccination Standards(if applicable)				
13	-		MH Children's Co	mpanion	-	_	33 Pharmacist(s) undergone accredited training course				
		version of P		_	-	34	_		acist(s) hold ASCIA(1 yr) CPR(1 yr) First Aid(3 yr) Cert		
	$\overline{}$		drug interaction			_ I	35 Adequate vaccine storage and temperature monitoring				
			Oon't Rush to Crus		_	36	_	Designated professional service		e disposal	
			complementary/	alternate	1	37		n date and complete anaphyla		\longrightarrow	
14		reference			—	38	-	An emergency response proto		\longrightarrow	
-			scheduling guide			39	_	Adequate hand washing or ha		cilities	
			controlling pharm	nacy prac	tice	40	-	Adequate patient monitoring a	area	\longrightarrow	
		eduled Me				41		Adequate record keeping			
15	Appropri	iately store:	s 'Pharmacy Only'	medicine	es	Cor	mpl	iance with Special Conditions			
16	Appropri	ately store:	s 'Pharmacist Only	/ medicir	nes	42	1	Appropriately complies with s	oecial conditions		
17	Appropri	ately store	s 'Prescription Onl	y' medici	ines		_				
Risk	Level	Score for	Total Number	Total Sc	ore	HT.	Tota	l Non-compliance Score for phare	macy is ≤ 5 the pha	rmacy will be	
		Each Risk	of Non-	for Each				ered compliant or compliant with		•	
		Level	Compliance	Risk Lev	el						
	/ Risk	1						Non-compliance Score for phare		and 17 the	
	lium Risk	2		Ь—	_	ph	arm	acy will be considered non – com	plant		
_	ı Risk	6		—	_			l Non-compliance Score for about		aman will be	
Extr	eme Risk	18	France Street	-	-			I Non-compliance Score for phart ered critically non-compliant.	macy is a 10 the pri	armacy will be	
	Total Non	-compliance Pharmacy	Score for the			_					
Ove	erall Inspe	ection Resi	ult: 🗆 Compli	iant 🗆	Non	Compliant		Critically Non Compliant	Follow Up Da	te:/	
	pector's N						寸	Inspector's Signature:	Finish Time		
							-	,			
Doc	eived By:				Signa	turo:	_		Date & Tim	0.	
and the	CIVEU DV.				. 315116	SHIE.			Parc & IIIII	<u>-</u> -	

NOTE: Failure to attend to the items in this report within the times specified may render you liable to legal action under the Public Health Act 1997 and the Medicines, Poisons and Therapeutic Goods Act 2008.

Appendix B – Opioid Dependency Treatment Centre Inspection Form



ACT Health

Opioid Dependency Treatment Centre Inspection Form

Health Protection Service

25 Mulley Street Holder ACT 2611 P: 02 5124 9700 F: 02 5124 5554 Locked Bag 5005 Weston Creek ACT 2611 hps@act.gov.au

Premises Details			u,	·					
Trading Name:		Date:	/			Start T		am/	pm
Premises Address:						File No): 		
Proprietor/Licensee: ODT Licence Number:		Licenc	a Evni	y Date:					
Inspection conducted with:		Licenc	.e Expii	y Date.					
Position: Proprietor ☐ Manager ☐ Person	in Charge □ Ot	ther 🗆:							
Inspection Type: Scheduled ☐ Follow Up ☐									
inspection type. scheduled in Follow op in	Complaint	New Licenc	е ш к	elurbishin	ent 🗆 Othe				
The following items are used to assess of ✓ – Compliant L– Low Risk Non-C									
Storage of Opioid Dependency Medicines		(Opioid	Dependen	y Treatment	t Licence	Inspection		
Compliant opioid dependency treatment storage receptade	medicine		7 A	ppropriate	counselling	/ dosing	facilities		
Appropriately stores opioid dependency medicines.	treatment		8 C	urrent Opi	oid Depende	ncy Trea	tment Centre	Licen	ce
3 Storage receptacle locked on inspection			_		ions for clier				
4 Storage receptacle key/combination app controlled	ropriately		10 1		nedicines reg re upto date	_	tries for opio	id depe	endency
5 Controlled medicines register for opioid of treatment is stored on premises	dependency		11 A	ll dispensi	ng pharmacis	st(s) have	undergonet	rainin	g
6 Controlled medicine balance correct									
Medicine, Form and Strength					Safe	p	eg.	Diff	
BUPRENORPHINE					Juic		-6.		-
Subutex s/l tab 0.4mg									
Subutex s/I tab 2 mg						_		+	
								+	
Subutex s/I tab 8 mg									
BUPRENORPHINE/NALOXONE									
Suboxone s/l filmtab 2mg/0.5mg								1	
Suboxone s/l filmtab 8mg/2mg						_		-	
METHADONE									
Biodone Fortesyrup 25 mg/5 ml								_	
Methadone Syrup 25mg/5ml									
Item Nos. Items Requiring Action									Due Date
-									l
Risk Level Each Risk of Non-	Total Score for Each						acy is≤5the minor issues*		acy will be
Level Compliance	Risk Level		If Total	Non-compl	iance Score f	or nharm	acy is betwee	n 5 an	d 18 the
Medium Risk 2					onsidered no	•	•		
High Risk 6									
Extreme Risk 18							acy is≥18th	e pharr	nacy will be
Total Non-compliance Score for the Pharmacy			conside	rea critical	y non- compl	ndfit.			
Overall Inspection Result: Compliant Non-compliant Critically Non-compliant Rectification Date: / /									
	or complaint with				451 50 7001	.,			
Inspector's Name:		inspect	or s S	ignature:			Finish Tim	e:	am/pm
Received By:	Signature:						Date & Tir	ne:	

NOTE: Failure to attend to the items in this report within the times specified may render you liable to legal action under the Public Health Act 1997 and the Medicines, Poisons and Therapeutic Goods Act 2008.

Appendix C – Consequence Table and Risk Matrix

The Consequence table assigns a level of severity against a range of harms as they are defined in the PH Act and MPTG Act.

	Consequence table Section 6(1) MPTG Act								
Harms	Minor	Moderate	Major	Catastrophic					
Accidental or deliberate poisonings	Ingestion of a poison or medicine with some adverse effects. Some first aid treatment required.	Poisoning or overdose requiring medical treatment.	Serious poisoning or overdose requiring hospital admission or ongoing medical treatment.	Death or near death due to poisoning or overdose.					
Medicinal misadventure	Some adverse effects experienced due to misadventure (mishap) with a medicine.	Overdose or adverse effects of a medicine requiring medical treatment.	Serious overdose or adverse effects of a medicine requiring hospital admission or ongoing medical treatment.	Death or near death due to overdose or adverse effects of a medicine.					
	Includes dispensing error for schedule 4 or 8 medicine which may lead to the above.	Includes dispensing error for schedule 4 or 8 medicine which may lead to the above.	Includes dispensing error for schedule 4 or 8 medicine which may lead to the above.	Includes dispensing error for schedule 4 or 8 medicine which may lead to the above.					
Diversion of regulated substance for abuse	Theft or diversion of a schedule 3 medicine for own use or supply to others.	Theft or diversion of schedule 4 medicines for own use or supply to others.	Theft or diversion of schedule 8 medicines for own use or supply to others. Includes the theft or diversion of lower scheduled substances (eg. S3) for illicit manufacture of schedule 8 or 9 substances.	Theft or diversion of large quantities of schedule 4 or 8 medicines for supply to others.					
Manufacture of regulated substances that are subject to abuse			Limited illicit manufacture of a schedule 8 or 9 substance.	Organised, broad scale illicit manufacture of a schedule 8 or 9 substance.					
Other harm from regulated therapeutic goods	Some adverse effects experienced. Some first aid treatment required.	Medical treatment required.	Hospital admission or ongoing medical treatment required.	Death or near death.					

The Risk Matrix is used to determine the level of risk by comparing the consequence of a harm against the likelihood of it occurring.

	Risk Matrix Section 4(a) PH Act						
Harm from facilities, equipment, products and activities		Some adverse effects experienced. Some first aid treatment required. Medical treatment required.		Hospital admission or ongoing medical treatment required.	Death or near death.		
Historical Likelihood	Likelihood	Minor	Moderate	Major	Catastrophic		
Is expected to occur in most circumstances	Almost Certain	н	н	E	E		
Will probably occur	Likely	М	н	н	E		
Might occur at some time in the future	Possible	L	М	н	E		
Could occur but doubtful	Unlikely	L	L	М	Н		
May occur but only in exceptional circumstances	Rare	L	L	L	н		

The consequence table and risk matrix has been developed by the HPS based on a subjective assessment of the likelihood and consequences of each potential event as they relate to the regulation of community pharmacies in the ACT.

Note: Not all inspection criteria have a full range of risk levels assigned to them. Some criteria may have a limited range, such as only Low or Medium Risk, or only Extreme Risk.

Appendix D – Community Pharmacy Risk Assessment Tool

Pharmacy Premises Public Health (Community Pharmacy) Code of Practice 2016 (No 1) Schedule 1 (3)	Low risk	Medium risk	High risk	Extreme risk
Does the community pharmacy consist of an enclosed area with direct access to a public place?			 The pharmacy is not operating in an enclosed area The public does not have direct access to the pharmacy 	
Does the community pharmacy contain an area set aside for the dispensing of items on prescription that is not less than 8 square metres? (dispensary)		There is an area set aside for dispensing, but the dispensary size is less than 8 square metres.	There is no specific area set aside for dispensary.	
Does the community pharmacy have at least 1 square metre of free working space, which is not less than 40cm wide for the dispensing of prescriptions?			The free working space is less than the requirement.	
Is the community pharmacy appropriately ventilated and hygienic?	Some Ventilation Some Hygiene E.g. Dust around air conditioning vents in the ceilings. Small accumulation of waste, dirt or other matter on floor or walls that can be easily cleaned.	Poor Ventilation Poor Hygiene E.g. Hazardous spill left on the floor without cleaning at the time of inspection.	No adequate ventilation present in the pharmacy Very poor hygiene E.g. Accumulation of waste, dirt or other matters on floors, walls or ceilings that is consistent with weeks to months' worth of build-up.	
Is there adequate lighting in the pharmacy?		Poor lighting in the pharmacy or dispensary.	No lighting in pharmacy or dispensary.	
Is the pharmacy constructed in a manner where the pharmacist can supervise the shop adequately?	Pharmacist is unable to supervise the supply of Schedule 2 medication.			
Does the pharmacy contain appropriate equipment for compounding of extemporaneous preparations?			The pharmacy does not contain appropriate equipment for compounding of extemporaneous preparations within their scope of practice.	
Is there an appropriate counselling facility available in the pharmacy?	Limited or no space available for confidential counselling of patients.			
Does the pharmacy have a dedicated fax machine for urgent communications?	The pharmacy does not have a dedicated fax machine			

The fax machine is not working		

Conduct of Business				
Public Health (Community Pharmacy) Code of Practice 2016 (No 1) Schedule 1 (5)	Low risk	Medium risk	High risk	Extreme risk
Is the pharmacy premise constantly under the control of a pharmacist while open for business?				There is no pharmacist controlling the pharmacy.
Is there prominent display of the name of the pharmacist in charge followed by the words 'Pharmacist in Charge'	 There is no display of the name of pharmacist in charge. The name of 'Pharmacist in Charge' is not correct. 			
Is the name of all persons practicing in the community pharmacy as a pharmacist displayed in a public place in a clearly legible notice in the premises?	The name of pharmacist(s) practicing in the pharmacy is not displayed in a clearly legible notice in the premises. The name of pharmacist(s) displayed is not correct.			
Legislation and Reference Works Public Health (Community Pharmacy) Code of Practice 2016 (No 1) Schedule 1 (2)	Low risk	Medium risk	High risk	Extreme risk
Does the pharmacy have current edition of the APF the AMH the TG or e-TG the AMH Children's Companion current version of Pl or CMI drug interaction reference SHPA Don't Rush to Crush Book	The pharmacy does not have current versions of some of the prescribed references.	The pharmacy does not have current version of more than 3 of the prescribed references.	The pharmacy does not have current versions of any of the prescribed references.	
Does the pharmacy have access to A complementary or alternate medicine reference current scheduling guide	The pharmacy does not have access to a complementary/alternate medicine reference. Pharmacy does not have access to current scheduling guide and			

•	access to legislation	legislation controlling		
	controlling	pharmacy practice.		
	pharmacy practice			

Storage of Medicines	Low risk	Medium risk	High risk	Extreme risk
Are 'Pharmacy only' medicines stored appropriately in the pharmacy? Section 520(1), MPTG Regulation 2008	The 'pharmacy only' medicine is not stored within 4m of, or in sight of the dispensary and pharmacist is unable to supervise sale.			
Are 'Pharmacist only' medicines stored appropriately in the pharmacy? Section 520(2), MPTG Regulation 2008			The 'pharmacist only' medicines are kept in a part of the premises where the public have direct access.	
Are 'Prescription Only' medicines stored appropriately in the pharmacy? Section 520(2), MPTG Regulation 2008			The 'prescription only' medicines are kept in a part of the premises where the public have direct access.	
Are controlled medicines stored appropriately in the pharmacy? Section 533(3)(a), MPTG Regulation 2008			Controlled medicines are stored outside the safe. But there is no direct public access to the storage area.	The controlled medicines are kept outside the safe in a part of the premises where the public has direct access.
Does the pharmacy have a compliant safe? Schedule 5 of MPTG Regulation 2008		Controlled medicines are stored in a safe which meets body, door and lock requirements as per schedule 5, but the safe does not meet moulding requirements. E.g. The safe is fixed to the floor with only 3 expanding bolts.	Controlled medicines are stored in a safe which does not meet the body, door or lock requirements. E.g. Controlled medicine is stored on the shelf or in a wooden safe.	
Is the safe kept locked all the time when not in immediate use?		The safe is not in immediate use but kept open at the time of inspection.		

Section				
533(3)(b),				
MPTG				
Regulation				
2008				
Is the safe	The safe key is not in			
key/	the possession of			
combination	pharmacist at the			
appropriately	time of inspection.			
controlled?	Non-pharmacist staff			
Section	have knowledge of			
533(3)(c) or	the combination to			
(d), MPTG	the safe and can			
Regulation	access it.			
2008				
Are the				
controlled	The most recent	The most recent of		
medicines	controlled medicine	controlled medicine		
register(s)	register is stored on	register is stored on the		There is no controlled
stored on	the premises. The	premises. The previous		There is no controlled
premises? Section 540(4),	previous registers (within the last two	registers (within the last two years) are missing		medicines register.
MPTG	years) are stored	or have been thrown		
Regulation	offsite.	out.		
2008	onsite.	out		
Are the entries				
in the				
controlled		A number of controlled		
medicines		medicine dealings have	Frequent repeated	
register up to		not been written into	incomplete or missing register	
date?		the register more than 24 hours after the	entries into the controlled	
Section 51(1),		dealings occurred.	medicines register.	
MPTG Act		dealings occurred.		
2008				
	The controlled	The controlled medicine	The controlled medicine	The controlled medicine
	medicine register	register balance of 5-	register balance of 10-20% of	register balance of more than
	medicine register balance of up to 5%	register balance of 5- 10% of product line	register balance of 10-20% of product line stored in the	register balance of more than 20% of product line stored in
	medicine register balance of up to 5% of product line	register balance of 5- 10% of product line stored in the pharmacy	register balance of 10-20% of product line stored in the pharmacy did not match with	register balance of more than 20% of product line stored in the pharmacy did not match
	medicine register balance of up to 5% of product line stored in the	register balance of 5- 10% of product line stored in the pharmacy did not match with the	register balance of 10-20% of product line stored in the pharmacy did not match with the actual stock on hand	register balance of more than 20% of product line stored in the pharmacy did not match with the actual stock on hand
	medicine register balance of up to 5% of product line stored in the pharmacy did not	register balance of 5- 10% of product line stored in the pharmacy did not match with the actual stock on hand	register balance of 10-20% of product line stored in the pharmacy did not match with	register balance of more than 20% of product line stored in the pharmacy did not match
	medicine register balance of up to 5% of product line stored in the pharmacy did not match with the	register balance of 5- 10% of product line stored in the pharmacy did not match with the actual stock on hand during inspection AND	register balance of 10-20% of product line stored in the pharmacy did not match with the actual stock on hand	register balance of more than 20% of product line stored in the pharmacy did not match with the actual stock on hand
	medicine register balance of up to 5% of product line stored in the pharmacy did not match with the actual stock on hand	register balance of 5- 10% of product line stored in the pharmacy did not match with the actual stock on hand during inspection AND was resolved at the time	register balance of 10-20% of product line stored in the pharmacy did not match with the actual stock on hand during inspection. OR	register balance of more than 20% of product line stored in the pharmacy did not match with the actual stock on hand during inspection. OR
	medicine register balance of up to 5% of product line stored in the pharmacy did not match with the	register balance of 5- 10% of product line stored in the pharmacy did not match with the actual stock on hand during inspection AND	register balance of 10-20% of product line stored in the pharmacy did not match with the actual stock on hand during inspection. OR The controlled medicine	register balance of more than 20% of product line stored in the pharmacy did not match with the actual stock on hand during inspection. OR Unexplained loss at the time
	medicine register balance of up to 5% of product line stored in the pharmacy did not match with the actual stock on hand during inspection	register balance of 5- 10% of product line stored in the pharmacy did not match with the actual stock on hand during inspection AND was resolved at the time	register balance of 10-20% of product line stored in the pharmacy did not match with the actual stock on hand during inspection. OR The controlled medicine register balance of 5% to 10%	register balance of more than 20% of product line stored in the pharmacy did not match with the actual stock on hand during inspection. OR Unexplained loss at the time of inspection or unexplained
	medicine register balance of up to 5% of product line stored in the pharmacy did not match with the actual stock on hand during inspection AND were resolved	register balance of 5- 10% of product line stored in the pharmacy did not match with the actual stock on hand during inspection AND was resolved at the time of inspection. OR The controlled medicine register balance of up to	register balance of 10-20% of product line stored in the pharmacy did not match with the actual stock on hand during inspection. OR The controlled medicine register balance of 5% to 10% of product line stored in the	register balance of more than 20% of product line stored in the pharmacy did not match with the actual stock on hand during inspection. OR Unexplained loss at the time of inspection or unexplained stock adjustment of controlled medicines (More than 100
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	Up to 2 entries made in the drug register within the last 12 months as suspected loss/theft of controlled medicines without notifying the Pharmaceutical Services Section.		
Is there a dedicated refrigerator available in the pharmacy for storing cold chain medicines? Public Health (Community Pharmacy) Code of Practice 2016 (No 1) Schedule 1 (3)(a)vi		There is no dedicated refrigerator for storing cold chain medicines.	
Does the refrigerator have appropriate temperature monitor control?	The refrigerator does not have temperature control.		

Dispensing of				
Medicines	Low risk	Medium risk	High risk	Extreme risk
MPTG Regulation 2008				
Is there appropriate labelling of dispensed medicines? Section 123, MPTG Regulation 2008	Some dispensed medications listed in Appendix K of SUSMP does not have sedation warning.	Other labelling requirements of dispensed medicine is not consistent with MPTG Regulation. OR Most dispensed medications listed in Appendix K of SUSMP does not have sedation warning.		There is no dispensing label on dispensed medicines.
Is there appropriate recording of dispensed medicines? Section 125, MPTG Regulation 2008		The recording of dispensed medicine is not consistent with MPTG Regulation.		Pharmacy is not recording of the supply of medicine.
Are telephone/faxed prescriptions followed up adequately? Section 120(1)(g), MPTG Regulation 2008	Pharmacy has some S8 oral/faxed prescriptions which are not adequately followed up. OR Pharmacy has up to 25 S4 oral/faxed prescriptions which are not adequately followed up	Pharmacy has more than 5 S8 oral/faxed prescriptions which are not adequately followed up. OR Pharmacy has more than 25 S4 oral/faxed prescriptions which are not adequately followed up.	Pharmacy has more than 10 S8 oral/faxed prescriptions which are not adequately followed up. OR Pharmacy has more than 100 S4 oral/faxed prescriptions which are not adequately followed up.	Pharmacy supplies medication to patients without supply authority from a medical practitioner.
Are emergency supply recorded appropriately? Section 254, MPTG Regulation 2008		The recording of dispensed medicine is not consistent with MPTG Regulation.		Pharmacy is not recording of the supply of medicine.
Are dispensed prescriptions properly endorsed? Section 124, MPTG Regulation 2008	Prescriptions for schedule 4 medications are not endorsed with the word 'cancelled'.	Prescriptions for schedule 8 medications are not endorsed with the word 'cancelled'.		
Are dispensed prescriptions stored appropriately in the pharmacy/ CHO approved location? Section 120, MPTG Regulation 2008	Dispensed prescriptions are stored in a secured area outside the pharmacy premises where only the pharmacist has access to without obtaining approval from the Chief Health Officer.		Dispensed prescriptions are stored in a place where public has direct access to the storage.	Dispensed prescriptions are not stored by the pharmacy for at least 2 years.

Vaccination Standard (applicable for pharmacies providing vaccination service)				
Vaccination Standards Public Health (Community Pharmacy) Code of Practice 2016 (No 1) Schedule 1 (4)	Low risk	Medium risk	High risk	Extreme risk
Has pharmacist(s) administering vaccines undergone accredited training course?			The pharmacist or intern pharmacist administering vaccine has not done accredited training course.	
Does the pharmacist hold current ASCIA, CPR and First Aid Certificates?			Pharmacist does not have current ASCIA, CPR and First Aid certificates.	
Does the pharmacy have an adequate vaccine storage and temperature monitoring?		There is poor temperature monitoring of vaccine storage fridge.	There is no dedicated fridge for adequate storage of vaccines. OR Faulty fridge OR There is no temperature monitoring.	
Is there a compliant designated professional services area and adequate waste disposal?		The designated professional service area is not compliant according to the Vaccination Standards	There is no designated professional service area. OR There is no adequate waste disposal.	
Is there an in date and complete anaphylaxis response kit?				Pharmacy has no access to an anaphylaxis response kit.
Is there an emergency response protocol and consumer information about a consumer's right to make a complaint on display?	Pharmacy does not have display of 'consumer information about a consumer's right to make a complaint.	There is an emergency response protocol but is not displayed.	There is no emergency response protocol in place.	
Is there adequate hand washing or hand sanitisation facilities?			There is no adequate hand washing or hand sanitisation facilities.	
Is there a designated patient monitoring area?		There is a designated patient monitoring area but the pharmacist who has completed the training is not able to easily monitor the patient.	There is no designated patient monitoring area.	
Is there adequate record keeping of vaccinations?			There is no written procedure in place for the vaccination process, dealing with adverse events, obtaining and recording patient consent and sending vaccination records back to the patient's nominated GP. OR The patient records does not contain all the relevant information as per the vaccination standard.	There is no record keeping of vaccinations conducted.