

Staff Access to Medicines for Personal Use Policy Directive

Version No.: v1.1

Approval date: 30 January 2019

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Staff Access to Medicines for Personal Use Policy Directive

1. Policy Statement

This policy promotes the safety and quality use of medicines and minimises the potential for harm to both SA Health employees and patients by providing clarity regarding staff access to medicines in the workplace. Medicines held by South Australian public hospitals and health services may only be accessed by staff in accordance with legislation and as required in their duties to ensure the appropriate treatment of patients within the hospital or health service.

2. Roles and Responsibilities

2.1 Chief Executive, SA Health:

- Ensures South Australian public hospitals and health services are aware of and comply with this policy.

2.2 Director of Medicines and Technology Programs:

- Establishes this policy; and
- Ensures the policy is maintained and periodically reviewed to ensure consistency with current evidence and nationally agreed best practice.

2.3 Chief Executive Officers of Local Health Networks (LHN) and Statewide Services :

- Ensure implementation of this policy within the LHN or Service.
- Ensure SA Health employees (including consultants, contractors and students) are aware of, have access to, and comply with this policy.
- Ensure breaches of this policy are handled in accordance with SA Health policy.
- Delegate the day-to-day responsibility for complying with this policy to the relevant senior managers.

2.4 Executive Directors, Directors, Heads of Service/Department and other senior managers:

- Develop, implement and monitor local processes that support the operation of this policy to ensure that medicines are accessed in accordance with this policy to patients of the hospital or health service as a result of a consultation through either an admission, outpatient clinic or the emergency department.
- Ensure breaches of this policy are reported via the Safety Learning System (SLS) and other pathways, as appropriate.

2.5 All SA Health employees (including consultants, contractors and students):

- Adhere to the principles and requirements of this policy.
- Adhere to local processes established to operationalise this policy.
- Adhere to and be aware of their responsibilities outlined in this policy.
- Have in place arrangements for access to their own supply of medicines that they are likely to require while at work and ensure these medicines are stored securely at the workplace.
- Report breaches of this policy in accordance with local procedures.

3. Policy Requirements

3.1. Background

Medicines are an integral component of the diagnosis and treatment of SA Health patients. SA Health employees may access medicines in the ordinary course of their profession and in undertaking work duties as required to ensure access for the treatment of patients within the hospital or health service.

In accordance with the need for timely patient treatment, medicines are available within SA Health hospitals and health services, and are accessible by staff from a variety of storage locations, as per legal requirements.

Inappropriate or unauthorised access to medicines in the workplace by employees may breach legal and regulatory requirements, and, result in unintended consequences and poor outcomes for both staff and patients.

This policy provides clarity for SA Health employees regarding access to medicines in the workplace.

3.2. Scope

This policy directive applies to:

- All SA Health incorporated hospitals and health services
- All SA Health employees (including consultants, contractors and students)
- All medicines held within SA Health facilities; this includes all medicines storage or holding sites (for example, wards, theatres, other treatment areas, automated dispensing cabinets, emergency trolleys, pharmacy departments and receiving stores) and; patient drawers/lockers and; patient own medicines.

The policy addresses staff access to medicines in the following areas:

- Staff access to medicines in the ordinary course of their profession and scope of practice, and defined role requirements
- Staff access to medicines for personal use
 - Hospital prescriptions
 - Other SA Health hospital prescriptions
 - External prescriptions
- Staff access to medicines for personal use while at work
 - Existing medical condition(s)
 - Emergency situations
 - First aid kits
- Unauthorised access to hospital or health service medicines

3.3. Risks

Failure to abide with this policy and authorised access may breach legal and regulatory requirements and increase the risk of medicine-related incidents affecting both employees and patients.

There may also be financial risk to SA Health.

These risks may be mitigated by:

- SA Health employees ensuring arrangements are in place for access to their own supply of any medicines that they are likely to require while at work and to ensure these medicines are stored securely at the workplace. This may require discussion with the relevant manager for advice and support.
- Local Health Network or health service procedures for managing the provision of medicines in an emergency situation and where first aid is required.
- Strict enforcement of this policy.

3.4. Staff access to medicines in the ordinary course of their profession, scope of practice and defined role requirements

Many SA Health employees handle or access medicines in undertaking their role in ensuring treatments are available to patients of SA Health hospitals and health services. This includes:

- Health professionals in the ordinary course of their profession and scope of practice e.g. medical practitioners, nurses and midwives, pharmacists and allied health staff.
- Support staff including pharmacy assistants, stores personnel and couriers.

All staff access to medicines must be in accordance with legal requirements and scope of their roles, for the sole purpose of appropriate medicines management and patient treatment.

Staff access to medicines outside the requirements of their defined role requirements and professional duties will be considered unauthorised access and must not occur (refer to section 3.7).

3.5. Staff access to medicines for personal use

The following cover situations where medicines may be accessed through the hospital for staff treatment.

3.5.1. Hospital prescriptions

SA Health employees are permitted to present a prescription written on locally approved stationery to the hospital or health service's Pharmacy Department for dispensing where:

- They are a registered public patient of the hospital or health service and have a hospital or health service Medical Record Number (or equivalent patient registration number), and;
- The prescription is provided as a result of consultation through either an admission, outpatient clinic or the Emergency Department, and;
- The SA Health employee must pay the relevant patient co-payment for each drug dispensed according to [SA Pharmacy Patient Charges and Business Rules Operating Procedure](#).
- Alternatively the hospital prescription may be dispensed by a community pharmacy

This includes SA Health employees who develop an injury, illness or condition requiring treatment while at work and are provided a hospital prescription as per local procedures (see below).

Hospital or health service prescriptions are not permitted to be written for personal use or for use or supply to friends or family members when unrelated to a consultation as a registered patient.

3.5.2. Other SA Health Hospitals prescriptions

For optimal patient care and continuity of medication supply, a prescription from another public hospital or health service may be dispensed if the criteria outlined in the [SA Pharmacy Patient Charges and Business Rules Operating Procedure](#) are met.

3.5.3. External prescriptions (community)

Pharmaceutical Benefits Scheme (PBS) prescriptions not written on hospital stationery are generally not approved for dispensing at a public hospital as per the [National Health Act 1953](#), unless:

- The SA Health employee is a registered patient of the hospital or health service, and;
- The prescription meets the exemption criteria outlined in the [SA Pharmacy Patient Charges and Business Rules Operating Procedure](#)

3.6. Staff access to medicines for personal use while at work

3.6.1 Existing medical conditions

SA Health employees with existing medical conditions that may require them to take medicines while at work (including prescription, pharmacy and over-the-counter medicines) should ensure they have arrangements in place to access their own supply of medicines for their personal use as necessary. These must be stored securely at the workplace or provided to (as relevant) an authorised first aid officer for administration in an emergency situation. The medicines must be appropriately labelled and packaged according to legal requirements.

3.6.2 Emergency situations

Hospitals and health services should have procedures in place for the provision of medicines to SA Health employees in emergency situations or where an employee develops an injury, illness or condition requiring treatment while at work.

SA Health employees who develop an injury, illness or condition requiring treatment while at work should follow the Local Health Network or health service procedure (e.g. consultation via the Emergency Department or other services as appropriate).

3.6.3 First aid kits

Hospitals and health services may consider the inclusion of selected medicines in first aid kits as provided in the [Model Code of Practice: First aid in the workplace](#).

- Medicines including analgesics such as paracetamol and aspirin should not be included in first aid kits due to their potential to cause adverse health effects in some people including pregnant women, asthmatics and people with other medical conditions. Consideration may be given to including selected medicines such as an asthma-relieving inhaler and a spacer to treat asthma attacks and adrenaline (epinephrine) auto-injector for the treatment of anaphylaxis or severe allergies. Where consideration is being given to the inclusion of such medicines in a first aid kit an appropriate risk-assessment must be undertaken in relation to the potential for adverse events.

3.7 Unauthorised access to medicines

Staff must be aware of their responsibility to adhere to this policy. Unauthorised access to medicines and breaches of this policy by any SA Health employee may result in legal consequences and/or disciplinary action.

3.7.1 SA Health employees' responsibilities for themselves:

- While at work, employees take reasonable care that his or her acts or omissions do not adversely affect the health and safety of other persons ([Work Health and Safety Act 2012](#), S28(b)), as such employees have a responsibility to ensure that they are not under the influence of alcohol, psychoactive drug(s) or other medicines which will produce such a state as to compromise performance, endanger patients, other members of staff or their own safety at work.

3.7.2 SA Health employees' responsibility for others:

- Staff noticing or suspecting unauthorised access of medicines, impairment of cognition or performance of another member of staff must be responsible in accordance with their duty of care to patients, whilst considering confidentiality and rights of others, to raise concerns with their manager or other local officers as appropriate.
- Health practitioners, employers and education providers are mandated by law to report to the Australian Health Practitioner Regulation Agency (AHPRA) notifiable conduct relating to a registered health practitioner or a student an impairment that may place the public at substantial risk of harm. Failure to report notifiable conduct may result in disciplinary action by the relevant National Board.

3.7.3 Drug abuse, diversion or misuse by staff:

- Staff must not misuse, divert or access hospital or health services medicines for their own purposes.
- All SA Health employees are responsible for medicines in their charge and must be alert to any possible diversion of medicines. The unauthorised access, misuse or diversion of hospital or health service medicines (e.g. medicines stored in, or ordered for ward imprest or individual patient use; or emergency trolleys or ambulances) or patients' own medicines by SA Health employees for illicit purposes may result in SLS reports, disciplinary action, SAPOL notification, investigation under the [Controlled Substances Act 1984](#) and/or further legal action.

Some known methods of medicine diversion include:

- Burglary/theft from ward stock or pharmacy storage areas
- Pretended loss or breakage
- Falsification of records
- Substitution of a drug with other ampoules, tablets or powders
- Drug dilution or removal of doses
- Giving partial doses to patients
- Forgery of prescriptions and supply orders
- Interception from pharmacy couriers
- Accessing medicine from returns or waste bins from pharmacy
- Accessing patients' own medicines









3.7.4 Breaches of this policy

- Where a SA Health employee suspects that another employee has breached any of the conditions of this policy directive, they must report the suspected breach according to Local Health Network or health service procedure.
- Health practitioners, employers and education providers have mandatory reporting responsibilities under the [Health Practitioner Regulation National Law \(SA\) Act 2010](#).
- Investigation and management of potential breaches of this policy must be in accordance with the provisions described in the [SA Health \(Health Care Act\) Human Resources Manual](#) or the [Public Sector Act 2009](#), whichever is applicable.
- Any unaccounted loss or suspected theft of medicines or substances that are subject to misuse and possible diversion, or a quantity of medicines or substances that cannot be reasonably accounted for, must be reported in accordance with the [Controlled Substances Act 1984](#) and [Suspected Theft or Loss of Drugs from Licence or Permit Holders](#). For further information consult the [Theft and Loss of Medications from Health Facilities and Licence or Permit Holders](#) webpage.

4. Implementation & Monitoring

Local Health Networks and health services are responsible for implementation of this policy and monitoring via annual SLS and/or OHS reports regarding employee illness or injury, issues accessing medicines and review potential breaches of this policy.

5. National Safety and Quality Health Service Standards

 National Standard 1 Clinical Governance	 National Standard 2 Partnering with Consumers	 National Standard 3 Preventing & Controlling Healthcare-Associated Infection	 National Standard 4 Medication Safety	 National Standard 5 Comprehensive Care	 National Standard 6 Communicating for Safety	 National Standard 7 Blood Management	 National Standard 8 Recognising & Responding to Acute Deterioration
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6. Definitions

In the context of this document:

- **medicine:** a substance used for therapeutic purposes. This includes all scheduled and unscheduled medicines (e.g. prescription, pharmacy and over-the counter medicines) and may also be known as a 'drug' or 'medication'.
- **patients' own medicines (POMs) :** medicines patients bring into the hospital at admission, or that is brought in from an external source at a later point during their stay in hospital. These are the current medicines that patients have been taking prior to their hospital/health service visit and may include prescription medicines, over-the-counter (OTC) medicines and complementary medicines.
- **diversion:** The transfer of legally prescribed drugs from the person for whom it was prescribed to another/others for any illicit use (including but not limited to misuse or trafficking).
- **misuse :** The use of a drug for purposes that are not consistent with the legal or clinical intent. This may include unsanctioned overuse, non-medical use of prescription medicines and inappropriate use (eg. injection of oral medication).
- **staff:** All SA Health employees (including consultants, contractors and students)

7. Associated Policy Directives / Policy Guidelines and Resources

Relevant SA Health policies, procedures and guidelines

[Pharmaceutical Reform: Policy for Public Hospitals Policy Directive](#)
[SA Pharmacy Patient Charges and Business Rules Operating Procedure](#)
[Worker Health Wellbeing and Fitness for Work Policy Directive](#)
[SA Health \(Health Care Act\) Human Resources Manual](#)
[Standing Medication Orders Guiding Principles](#)
[Suspected Theft or Loss of Drugs from Licence or Permit Holders](#)
[Prescription Pad Management Policy Directive](#)

Relevant Legislation

[Controlled Substances Act 1984](#)
[Work Health and Safety Act 2012](#)
[Therapeutic Goods Act 1989](#)
[Public Sector Act 2009](#)
[Health Practitioner Regulation National Law \(SA\) Act 2010](#)

Other Relevant Documents

[Code of Ethics for the South Australian Public Sector](#)

[Links to the codes of ethics and professional conduct for health professions can be found on the Australian Health Practitioners Regulation Agency \(AHPRA\) website](#)

[Model Code of Practice: First aid in the workplace](#)

8. Document Ownership & History

Document developed by: Medicines and Technology Programs, Systems Performance and Service Delivery

File / Objective No.: 2018-04920 | A885251

Next review due: 30/06/2023

Policy history: Is this a new policy (V1)? **N**

Does this policy amend or update an existing policy version? **Y**

If so, which version? V1

Does this policy replace another policy with a different title? **N**

ISBN No.: 978-1-76083-119-6

Approval Date	Version	Who approved New / Revised Version	Reason for Change
30/01/19	V1.1	Deputy Chief Executive	Formally reviewed in line with 1-5 year scheduled timeline and changed to new policy directive template
01/09/13	V1.0	Portfolio Executive	Original Portfolio Executive approved version.