



## Administration of medicines by pharmacists in South Australia

Legal advice has been sought to clarify the lawful administration of medicines by pharmacists in South Australia. It has been determined that under South Australia's Controlled Substances legislation there are no restrictions or prohibitions upon the administration of:

- an unscheduled, Schedule 2, or Schedule 3 medicine by a person, to another person; and
- a Schedule 4 or Schedule 8 medicine by a person, to another person, if the medicine has been lawfully prescribed and supplied to that person.

A person includes a pharmacist and therefore it is not an offence under the CS Act under these circumstances.

Note: administration of travel vaccinations is not currently allowed by pharmacists due to the requirements of the Vaccine Administration Code.

Whilst there are no legal barriers to a person administering an unscheduled, Schedule 2, or Schedule 3 medicine or a Schedule 4 or Schedule 8 medicine which has been lawfully prescribed and supplied for a person, **individual pharmacists should consider whether this is appropriate and safe and must ensure they are working within their scope of practice and have all the requisite professional skills, relevant training, competencies and knowledge.** This includes assessment of the requirements specific to each patient and each medicine, including route of administration. An appropriate clinical governance framework including appropriate risk assessments and quality management systems should be in place to ensure professional conduct, compliance with professional standards and patient safety.

## Scope of practice and competency

Whilst there are no legislative barriers to administering an unscheduled, Schedule 2, or Schedule 3 medicine or a Schedule 4 or Schedule 8 medicine **which has been lawfully prescribed and supplied**, it is important for individual pharmacists to ensure they are working within their scope of practice, in accordance with relevant guidelines, practice and professional standards and have the relevant skills, competency and knowledge to safely undertake these activities.

The Pharmacy Board of Australia has stated they have no barriers to or concerns about, competent pharmacists administering medicines by injection in accordance with authorisations set out in state and territory legislation.

Pharmacists must operate within appropriate clinical guidelines for the specific injectable medicines and the pharmacist should ensure that the drug is clinically indicated for the person, and that it is safe to administer. Guidelines and accredited training courses for pharmacists on administering medicines by **subcutaneous or intramuscular injection** are available and may support pharmacists in developing the requisite skills and knowledge to provide an administration service for some prescribed medications, including [through the PSA](#).

Pharmacists are responsible for ensuring their own competency in both technical administration and clinical knowledge of the patient and of the medicine to be injected.

South Australia does not have the clinical practice guidelines to support for the administration of Long Acting Injectable Buprenorphine (LAIB), however SA Health is currently developing these guidelines for South Australian pharmacists.

### Practice considerations

**Pharmacists considering administering medicines by injection should consult with their indemnity insurer prior to providing the service.** Specific considerations for pharmacists and pharmacy services providers to ensure safe and effective provision of a service include ensuring:

- All relevant training and education has been completed and refreshed at required intervals
- Compliance with best practice guidelines including [PSA Injection Guidelines](#)
- Administration is in accordance with prescriber instructions and product information
- Immediate and ready access to relevant resources
- Sufficient staffing to ensure safe delivery of the service and other pharmacy services
- Safety of patients and pharmacy staff including appropriate safe handling procedures, infection control, sharps, and clinical waste management.
- Standard operating procedures are in place for service delivery and implemented consistently
- Appropriate mechanisms to document and record the service are in place
- Knowledge of signs and symptoms of adverse reactions and relevant management plans available including anaphylaxis management
- Service delivery occurs in an area of the pharmacy providing auditory and visual privacy

### What a pharmacist cannot do under the legislation

A pharmacist cannot administer a prescription drug to a person where that prescription drug has **NOT** been prescribed or lawfully supplied to that person, as per section 18 (1d)(a)(i) and (ii) of the CS Act. The only exception to this is outlined in section 18(1d)(a)(iii) of the CS Act where if administration by the pharmacist is authorised under the *Controlled Substances (Poisons)*

*Regulations 2011*. Regulation 18(3) permits a prescription drug to be administered as part of an immunisation program delivered by an organisation approved by the Minister (under the Vaccine Administration Code and excluding administration of travel vaccines).

## Summary of the legislation

The relevant legislation in regards administration including by injection are as follows:

<b>Unscheduled</b>	Unscheduled drugs are not regulated under the <i>Controlled Substances Act 1984</i> (CS Act), including their administration.
<b>Schedule 2 or Schedule 3</b>	There are no restrictions or prohibitions under the CS Act upon the administration of S2 or S3 drugs by a person to another person.
<b>Schedule 4</b>	The CS Act section 18(1d)(c)(ii) provides that it is lawful for any person to administer a prescription drug if it has been lawfully prescribed or supplied to that person.
<b>Schedule 8</b>	The offence provisions of the CS Act for controlled drugs (including Schedule 8 drugs) are outlined in Part 5. Section 31(1)(c)(i) and (ii) of the CS Act stipulate that Part 5 doesn't apply if the administration of a relevant controlled drug is to a person for whom the drug has been lawfully prescribed or the administration of a relevant controlled drug is to a person to whom the drug has been lawfully supplied for the purpose of consumption or administration by the person.
<b>Prescriber</b>	The <i>Controlled Substances (Poisons) Regulations 2011</i> outlines a "prescriber" means a person who lawfully gives a prescription for a drug. Section 18(1)(a) of the CS Act stipulates who can prescribe in South Australia which includes a: <ul style="list-style-type: none"> <li>- Dentist, medical practitioner or nurse practitioner <b>OR</b> a registered health practitioner endorsed under section 94 of the Health Practitioner Regulation National Law.</li> </ul>

Please forward this update to staff or colleagues who may not have received it and contact us at [Health.OfficeoftheChiefPharmacist@sa.gov.au](mailto:Health.OfficeoftheChiefPharmacist@sa.gov.au) to be added to our mailing list or with any other enquiries.

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