



POSITION STATEMENT

Vending Machines and Collection Units in Community Pharmacy

Position

The Pharmacy Guild of Australia (Guild) recognises that home deliveries and secure pharmacy collection units can provide a useful means to enable patients to collect medicines and other pharmacy goods from their preferred pharmacy, particularly when it may be difficult for them to attend the pharmacy during opening hours. In all circumstances however, patient safety must always be prioritised. The Guild advocates for clear and consistent definitions of pharmacy collection units and vending machines with consistent controls to be adopted in all jurisdictions. Complementing this, there must be no reduction or dilution of the professional obligations that a pharmacist has with the supply of medicines to ensure the quality use of medicines or patient outcomes are not compromised.

The Guild strongly opposes the use of vending machines for the supply of scheduled medicines, including via prescription, as we believe this is inconsistent with the Quality Use of Medicines principles and has inherent patient safety risks. The Guild recognises that some states and territories allow the use of vending machines that are not within or attached to a pharmacy; we support this only in exceptional public health circumstances for the supply of medicines and other unrestricted items, such as part of the Victorian harm reduction services¹. This must only be permitted with systems in place to manage public safety risks, such as limiting the purchase of multiple packs. Restrictions should apply to vending machines in these circumstances that any medicine must be in an original manufacturer pack with a maximum quantity of two adult dosage units.

A **Pharmacy Collection Unit (PCU)** is a secure mechanised unit that a community pharmacy can use, only after a patient consult with the pharmacist or delegated staff member, to allow collection of medicines and other pharmacy goods that have been prepared and paid in advance of collection by identified individuals.

The Guild supports the installation and operation of a PCU in a community pharmacy where the pharmacy and PCU comply with the following requirements:

The pharmacy must:

- operate the PCU in a manner whereby a pharmacist must fulfill all professional obligations as they relate to the dispensing and supply of medicines
- ensure the PCU is permanently secured to the pharmacy premises
- register the PCU with the State or Territory pharmacy authority
- ensure installation and operation of the PCU comply with Council or Local Government regulations and pharmacy lease conditions
- ensure operation of a PCU is covered under the pharmacy's insurance policy
- have appropriate video surveillance in place to monitor the operation of the PCU

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Ref: [SP1000-901805690-544](https://www.guild.org.au/SP1000-901805690-544)

- have quality accreditation with appropriate clinical governance and quality assurance procedures in place

The PCU must:

- use personal identification access codes to ensure access only to the items intended for the identified individual
- be accessible only by authorised persons i.e. pharmacy staff and persons with a personal identification access code
- be tamper proof and have security in place to discourage any unauthorised interference
- maintain goods within the recommended temperature and humidity range
- not be used for the purpose of imprest
- not be directly used to process dispensing of prescriptions or payments
- have audit trail capabilities for collection attempt
- be able to identify partial or missed collections and either remove items from the collection shoot or alert the pharmacy, depending on the type of PCU in operation
- have customer support functionality in case issues arise at time of collection

A PCU may be attached to a dispensary robot in which the dispensing and payment processes are done separately and the PCU is used for the collection of goods by the patient or their agent.

A **Community Pharmacy Vending Machine (CPVM)** is a secure mechanised storage unit that enables automated, self-service selection and payment transactions to supply a non-scheduled medicine or other unrestricted pharmacy product.

The pharmacy and CPVM must comply with the following requirements for the installation and operation at a community pharmacy.

The pharmacy must:

- only sell non-scheduled medicines in quantities of up to two adult doses from the CPVM
- ensure all items for sale are in the original manufacturers pack
- ensure the CPVM is permanently secured to the community pharmacy premises or is within the lease-lines of the pharmacy premises
- register the CPVM with the State or Territory pharmacy authority
- ensure installation and operation of the CPVM comply with Council or Local Government regulations and pharmacy lease conditions
- ensure operation of a CPVM is covered under the pharmacy's insurance policy
- have appropriate video surveillance in place to monitor the operation of the CPVM
- have quality accreditation with appropriate clinical governance and quality assurance procedures in place

The CVPM must:

- enable payment transactions for the supply of stored items
- not permit unsupervised access by children
- be tamper proof and have security in place to restrict access to stored items and discourage any unauthorised interference
- maintain goods within the recommended temperature and humidity range

Managing Patient Safety Risks

The Guild recommends that where a community pharmacy is contemplating the introduction of a PCU or CPVM, a comprehensive due diligence review of professional requirements should be undertaken, particularly those from the Pharmacy Board of Australia and the Australian health practitioners regulation agency (Ahpra).

Pharmacies should seek independent legal advice to ensure all arrangements are compliant with applicable regulations (i.e. Commonwealth, state or territory and local council) regarding pharmacy premises, clinical practice, medicines and poisons as well as use of Government identifiers such as Medicare or Concession cards.

Additionally, consideration should be given to:

- how a system or process will integrate into the pharmacy's current practice
- under what circumstances a supply arrangement will be offered and development of clear service parameters
- ensuring communication between the pharmacist and patient is upheld to support the safe and quality use of medicines
- the benefits and risks to patients and to the pharmacy of a PCU or CPVM service
- clinical governance and quality management systems, including establishing processes and procedures to support indirect supply of medicines consistent with QUM principles and Quality Care Pharmacy Program (QCPP) accreditation requirements
- ensuring consistency with Australian Consumer Law²
- ensuring patient autonomy in choice of provider is maintained
- ensuring Australian Privacy Principles³ and patient data are not compromised by the introduction of a new system or process
- avoiding security breaches.

The Guild supports the development by the pharmacy sector of professional guidelines on the use of collection units and vending machines by community pharmacy.

Background

Current regulations

Vending machines and collection units are regulated at a jurisdictional level. There is no consistent definition for either, and little differentiation between a vending machine and a collection unit. All jurisdictions have an outright prohibition on a vending machine for the sale and supply of scheduled medicines, with the exception of Victoria's free naloxone program⁴. Some jurisdictions allow for the supply of up to two adult doses of an unscheduled medicine in a manufacturer's pack so long as unsupervised access by children is prevented.

Safety Risks

If implemented incorrectly and with haste, the use of medicine collection units and vending machines may lead to patient harm and has the potential to undermine the value of community pharmacy as the key provider of medicine-related primary health care services throughout Australia. The risks associated with this type of medicine supply and collection include:

- lower capacity for pharmacist to meet legal obligations and professional requirements to assess safety and therapeutic appropriateness of medicine prescribed or requested

- non-provision of counselling on how to use the medicine safely and appropriately for optimal therapeutic effect
- inability to demonstrate use of medicine devices and assessment of patient's understanding
- pharmacist relying on patients to provide a true and accurate description of their condition without being able to assess the condition in person
- greater opportunity for consumer access to medicines at risk of abuse or misuse
- technical difficulties for communicating between the pharmacy and the patient

These risks are enhanced for people with hearing and sight impairment, learning difficulties or high-risk patients such as the elderly, children, people living alone, people starting a new medicine or using high-risk medicines or people with serious and/or multiple co-morbidities. It may also be problematic for people who do not have adequate access to or understanding of the technological requirements for a remote consultation.

Pharmacists have legal and professional obligations to ensure patients have a therapeutic need for medicines they use and to provide advice and counselling to optimise the safe and quality use of medicines. However, patients also have the right to refuse counselling from a pharmacist, in which case written information should be provided. If a patient and/or carer refuses to provide the necessary information to the pharmacist to enable safe dispensing and/or supply of a medicine, then the pharmacist needs to determine if contactless supply is appropriate under the circumstances.

Dispensing Robots

Dispensing robots are secure, mechanised medicine storage units with technology connected to a pharmacy's dispense system and which accurately selects and delivers the correct medicine to the point of dispensing for labelling and assembly. Dispensing robots may also be set up for inventory management as well as other administrative functions within a dispensary.

Related Statements

Telehealth & Telepharmacy

Authority

Endorsed

National Council – August 2025

In-person supply of medicines

National Council – August 2024

National Council – June 2023

Internet/Distance/Mail order supply of medicines

National Council – June 2010

National Council – July 2004

Reviewed

Policy and Regulation Sub-Committee – July 2025

Policy and Regulation Sub-Committee – August 2024

Policy and Regulation Sub-Committee – February 2023

References

¹ [Harm Reduction Stock | Mental Health, Drugs & Alcohol Services](#)

² [About Australian Consumer Law | Consumer Law](#)

³ [Australian Privacy Principles | OAIC](#)

⁴ Op cit Mental Health, Drugs & Alcohol Services