

Senate Standing Committee on Community Affairs References Committee

Inquiry into the administration of registration and notifications by the Australian Health Practitioner Regulation Agency and related entities under the Health Practitioner Regulation National Law

APR

2021

Purpose and scope of this submission

The Pharmaceutical Society of Australia (PSA) is pleased to make this submission to the Senate Standing Committee on Community Affairs References Committee for the **Inquiry** into the administration of registration and notifications by the Australian Health Practitioner Regulation Agency and related entities under the Health Practitioner Regulation National Law.

PSA's comments relate to the Inquiry **Terms of Reference**, specifically the following clauses:

- (b) the role of AHPRA, the National Boards, and other relevant organisations, in addressing concerns about the practice and conduct of registered health practitioners
- (e) the role of universities and other education providers in the registration of students undertaking an approved program of study of clinical training in a health profession
- (f) access, availability and adequacy of supports available to health practitioners subject to AHPRA notifications or other related professional investigations
- (i) the role of independent decision-makers, including state and territory tribunals and courts, in determining the outcomes of certain notifications under the National Law.

About PSA

PSA is the only Australian Government-recognised peak national professional pharmacy organisation representing all of Australia's 34,000 pharmacists working in all sectors and across all locations.

PSA is committed to supporting pharmacists in helping Australians to access quality, safe, equitable, efficient and effective health care. PSA believes the expertise of pharmacists can be better utilised to address the health care needs of all Australians.

PSA works to identify, unlock and advance opportunities for pharmacists to realise their full potential, to be appropriately recognised and fairly remunerated.

PSA has a strong and engaged membership base that provides high-quality health care and are the custodians for safe and effective medicine use for the Australian community.

PSA leads and supports innovative and evidence-based healthcare service delivery by pharmacists. PSA provides high-quality practitioner development and practice support to pharmacists and is the custodian of the professional practice standards and guidelines to ensure quality and integrity in the practice of pharmacy.

Recommendations

PSA submits the following recommendations for the consideration of the Senate Committee.

Recommendation 1: *Review the design and presentation of information and resources on the AHPRA/ Pharmacy Board web sites to improve navigation and clarity.*

Recommendation 2: *Review AHPRA's response rates and response times to email and telephone enquiries from practitioners.*

Recommendation 3: *Clarify the timing of commencement of the process, and documentation requirements, for intern pharmacists (holding provisional registration) applying for general registration.*

Recommendation 4: *Investigate options to make available mentor pharmacists to support those subject to a notification process, and for PSA to provide recommendations of appropriate mentor pharmacists to the Pharmacy Board.*

Background

As a recognised health peak and advisory body, PSA provides the Australian Government with access to high quality health sector information to improve the capacity, quality and safety of Australia's healthcare system. PSA supports and contributes to the Australian Government's objectives by:

- delivering effective consultation and information sharing with members of the pharmacy profession, the wider health sector, the community and the Australian Government
- functioning as a repository and source of sector knowledge and expertise
- providing well-informed and impartial advice to the Commonwealth within PSA's area of expertise
- providing education and training to pharmacists working in relevant parts of the health sector to improve the quality of health services.

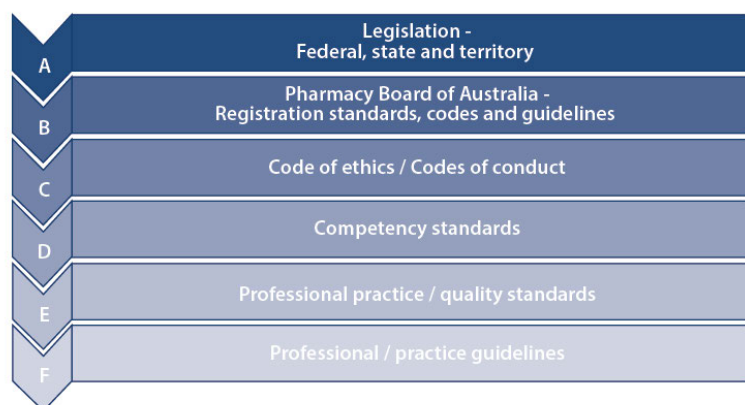
PSA is the standards-setting body for the pharmacy profession and is regarded for the high quality education, training and practice support resources and programs it provides. PSA supports pharmacists in helping Australians to access quality, safe, equitable, efficient and effective health care.

Framework of professional and ethical standards for pharmacists

Pharmacists are the most accessible health practitioners providing essential patient-centred health care services in a professional, ethical and compassionate manner. With their unique medicines expertise, pharmacists provide health care, education and advice across all settings to promote good health and to reduce the incidence of illness.

The practice of pharmacists is governed and supported by a comprehensive, hierarchical framework of legislation, and professional and ethical standards, as summarised in **Figure 1**. Pharmacists practising under this framework are committed to person-centred care, evidence-based best practice, collaborative team care arrangements and quality improvement.

Figure 1: Hierarchy of standards for pharmacists



- A. Commonwealth, state and territory legislation provides the legal framework governing pharmacy practice.
- B. The Pharmacy Board of Australia's registration standards define requirements to be met to be registered as a pharmacist in Australia. The Board's codes and guidelines may be used as evidence of what constitutes appropriate professional conduct or practice for pharmacists.
- C. Codes of ethics / conduct articulate the values of the pharmacy profession and expected standards of ethical behaviour of pharmacists towards individuals, the community and society.
- D. Competency standards describe the skills, attitudes and other attributes (including values and beliefs) attained by an individual based on knowledge and experience which together enable the individual to practise effectively as a pharmacist.
- E. Professional practice standards (or quality standards) relate to the systems, procedures and information used by pharmacists to achieve a level of conformity and uniformity in their practice. Quality standards may be applicable to individuals or to organisations.
- F. Professional guidelines are generally service- or activity-specific and provide information on how best to deliver services consistent with expected professional standards.

As the profession's standards-setting body, PSA is the custodian of the *National competency standards framework for pharmacists in Australia*¹ (document type D in Figure 1), and also develops, maintains and promulgates its own suite of documents, including: *Code of ethics for pharmacists*² (C), *Professional practice standards*³ (E), *Clinical governance principles for pharmacy services*⁴ (E/F) and

¹ National competency standards framework for pharmacists in Australia. Canberra: PSA; 2016. At: <https://www.psa.org.au/wp-content/uploads/2018/06/National-Competency-Standards-Framework-for-Pharmacists-in-Australia-2016-PDF-2mb.pdf>

² Pharmaceutical Society of Australia. Code of ethics for pharmacists. Canberra: PSA; 2017. At: <https://www.psa.org.au/wp-content/uploads/2018/07/PSA-Code-of-Ethics-2017.pdf>

³ Pharmaceutical Society of Australia. Professional practice standards. Version 5. Canberra: PSA; 2017. At: <https://www.psa.org.au/wp-content/uploads/2018/08/Professional-Practice-Standards-v5.pdf>

⁴ Pharmaceutical Society of Australia. Clinical governance principles for pharmacy services. Canberra: PSA; 2018. At: https://www.psa.org.au/wp-content/uploads/2019/05/PSAClinicalGovernancePrinciples2018_FINAL.pdf

various guidelines (F) to support professional practice activities and pharmacist-delivered health services.

As such, the professional practice and conduct of pharmacists are a fundamental focus for PSA – through the promotion of best practice and, in cases of substandard conduct or behaviour, providing education, advice and remediation support.

While the organisational remit of PSA is different to that of the Pharmacy Board of Australia, both organisations work collaboratively in the best interests of public health and safety. This may include, for example, PSA communicating with pharmacists on relevant professional practice topics, consistent with key messages issued by the Pharmacy Board.

The Pharmacy Board has endorsed many of PSA's documents including the *Professional practice standards* (under E in Figure 1) and the *Code of ethics for pharmacists* (under C in Figure 1). Pharmacists are advised that the Board may refer to, or use, these documents when considering complaints or notifications involving the conduct or behaviour of pharmacists. Other agencies that consider complaints or notifications (e.g. NSW Health Care Complaints Commission) also require access to, and use of, these PSA documents from time to time to assist in their investigations.

PSA's documents (such as standards, code, guidelines) are also frequently referenced in Commonwealth or State/Territory legislation (e.g. [National Health \(Pharmaceutical Benefits\) \(Conditions of approval for approved pharmacists\) Determination 2017](#)).

PSA supporting pharmacists with AHPRA-related matters

As the professional body for all pharmacists, PSA has a core role in responding to queries on initial and ongoing pharmacist registration requirements, communicating and facilitating access to correct information on AHPRA/Pharmacy Board, and supporting pharmacists who are subject to a complaints or notification process. These are further outlined below.

PSA's Pharmacist Advice Line

PSA has a Pharmacist Advice Line which provides one-on-one telephone support by a PSA staff pharmacist to PSA members on a range of topics and queries.

With regards to AHPRA-related queries received from pharmacists through this Advice Line, the majority of calls are around continuing professional development (CPD) requirements. Many of these queries are responded to by redirecting the caller to the relevant page or document on the Pharmacy Board (or AHPRA) web site. This may be an indication that information made available through the Board's web site could benefit from restructuring or rearrangement.

Over the last 12 months, PSA also received many queries on whether or not pharmacists were required to complete the usual CPD requirements due to the impact of the COVID-19 pandemic.

The second most common query PSA receives through the Advice Line is in relation to registration. These are frequently overseas-trained pharmacists, but also pharmacists re-registering in Australia. The latter numbers appeared to increase recently – possibly due to the establishment of the COVID-19 sub-register. Anecdotally, many callers indicated they had contacted PSA because they had not received a response from AHPRA to their email query or they could not get through on the telephone.

'Recency of practice' is another reasonably common query. This often comes from pharmacists with young families or those at the end of their careers who may be struggling to meet the Board's recency of practice requirements.

While numbers are small, PSA also receives enquiries through the Advice Line when pharmacists first receive advice of a notification. They generally call PSA seeking support and advice so that they can be informed and confident about meeting the conditions or requirements issued by AHPRA.

Registration matters

Of the feedback that PSA has received in relation to initial general registration applications, overall, the process is considered to be much easier since moving online.

PSA is aware that some intern pharmacists (who hold provisional registration) commence lodgement of their general registration application towards the end of their intern training program (ITP). In these cases, they have yet to complete their intern training and are generally awaiting their final ITP assignments to be marked. This tends to create some angst as the intern pharmacists are keen to receive their final assessment outcomes in order to finalise their AHPRA application – otherwise they fear their application will be rejected by AHPRA. These are reportedly only a small number of intern pharmacists. However, it is not clear to PSA why the application process can be commenced without all necessary documentation.

Pharmacists subject to notifications

Feedback from pharmacists

PSA is acutely aware of the significant psychological impact a notification can have on pharmacists (and other practitioners). Several pharmacists indicated first-hand to PSA that, after being made aware that a notification had been made about them, the subsequent time lag experienced when no information or update was forthcoming from AHPRA was extremely stressful. They indicated that firstly, the practitioner should be provided with a summary of steps and likely timeframes of the notification process so that they know in broad terms what to expect. In addition, they felt they should not be left hanging or guessing – thus regular updates when work is in progress or decisions are pending ought to be standard practice.

PSA congratulates AHPRA for the significant work undertaken to date in reforming the notification process to improve the experience of notifiers and notified practitioners. The focus on “just and fair treatment” of those involved, developing a set of experience principles, improving timeliness of the process, and providing regular updates to the notifier and practitioner during the process are all important considerations.

Ethics course

PSA believes the most significant support it offers to pharmacists subject to a notification is through the delivery of its *Ethics and Dispensing in Pharmacy Practice* course which provides comprehensive content on legislation and ethics relevant to pharmacist practice. The key areas covered include: applying Australian legislation in pharmacy practice, applying pharmacy codes in resolving ethical dilemmas, and managing complex and sensitive situations ethically.

PSA understands that a pharmacist subject to a notification is informed by the Board if they are required to complete “an ethics course”. For those undertaking PSA’s course, the learners receive support from PSA as they progress through the course. This may range from email communication at key stages of the course, through to regular/frequent telephone support on the content or concepts – depending on the learner’s needs.

Mentor pharmacists

Pharmacists, as regular learners or as a practitioner undergoing remediation, often indicate the value in having a professional colleague as a mentor. Going forward, PSA would be keen to investigate options, in collaboration with AHPRA and the Pharmacy Board, to implement an arrangement for those practitioners subject to a notification who may wish to have this type of support. PSA could provide recommendations of mentor pharmacists to assist the Board.

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30 April 2021