

PHARMACY BOARD OF TASMANIA

Registrar
Jayne Wilson

Telephone (03) 6224 9331
Fax No : (03) 6224 9700

GPO Box 792
HOBART 7001

LEVEL 2, 24 MURRAY ST
HOBART 7000

4 May 2009

The Secretary
Senate Community Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Re: Inquiry into the National Registration and Accreditation Scheme for Doctors and Other Health Workers

The proposed scheme involves considerably more than the creation of a simple national registration scheme. The Board holds significant concerns that in the interests of public safety the date of implementation of 1 July 2010 is impractical, given the need to ensure a smooth transition involving the amalgamation of ten professions in eight jurisdictions into the one national agency.

The current registration scheme in Tasmania is administered under the Pharmacists Registration Act 2001 with the Board as a separate statutory body funded entirely through the profession's registration fees. The proposed national scheme will add another bureaucratic layer and be more complex. It will be a more expensive system resulting in increased registration fees for health care providers which will be passed on to the consumer and with no guarantee the level of safety to the public will be increased.

In addressing the Inquiry's terms of reference below, the Board has detailed specific concerns regarding the current proposals for the implementation of the proposed scheme.

(a) the impact of the scheme on state and territory health services;

Currently the Pharmacy Board of Tasmania administers registration of both individual pharmacists and pharmacy premises and the two functions are closely linked. In addition it administers the Intern Traineeship Program and conducts examination of candidates seeking pharmacist registration. The Board also regulates ownership of pharmacies – an increasingly complex task with some ownership spread over sole traders, partnerships, companies, trusts, unit trusts etc. It is essential that the Board monitor the practice of the profession at a local level, ensuring the maintenance of high professional standards and conduct.

The proposed new National Registration and Accreditation Scheme does not cater for many of these critically important and often interwoven functions. These responsibilities will need to be provided for under any new arrangements or the existing body retained to administer the remaining functions, adding to the regulatory complexity

(b) the impact of the scheme on patient care and safety;

The Board is concerned that the changes have the potential to create confusion among pharmacy professionals and increases the potential for the safety of the public to be compromised.

The Board is also concerned by the lack of nationally consistent drugs and poisons, privacy, freedom of information and other legislation. All of these impact on the working practice of registered pharmacists in each jurisdiction.

The Board considers these strong reasons for the national registration and accreditation scheme to ensure there will be a pharmacy specific state committee in each state with a high level of local knowledge and the capacity to work closely with the state appointed body administering pharmacy registration. This is essential to ensure that the public is adequately protected and continues to receive pharmacy services of the highest professional standard. It is in the public interest to ensure that local professional pharmacy expertise with experience and knowledge of the registration scheme is available to support the administrative structure in Tasmania.

(c) the effect of the scheme on standards of training and qualification of relevant health professionals;

The Pharmacy Board supports:

1. A National Registration scheme which provides mobility of workforce and a central database of registered pharmacists,
2. National Standards of Practice,
3. Continuation of National Accreditation of Pharmacy schools and examination of overseas applicants for Australian registration. These processes are currently successfully undertaken by the Australian Pharmacy Council
4. Consistency of legislation between jurisdictions including uniform Poisons legislation.

The Board supports the formal establishment of a national Pharmacy Board which deals with high level policy issues regarding registration and accreditation. Presently an incorporated association of the existing registration boards has the capacity to fulfil this function. This association is represented on the existing accreditation body referred to in 3 above.

(d) how the scheme will affect complaints management and disciplinary processes within particular professional streams;

Under the proposed scheme, complaints will initially be handled locally. The Board is concerned about the general public having sufficient access to people with experience of the Pharmacy profession to handle complaints. The Tasmanian office is likely to be staffed by ex employees of the Nursing Board and Medical Council and given the large numbers of registrants in those professions it is likely that a small profession such as Pharmacy will not be a high priority.

Additionally the Board is unsure of how complaints relating to a pharmacy (not part of the current scheme) will be separated from complaints relating to an individual pharmacist.

If there is not a state committee and staff with experience of the Pharmacy profession in the state office there will be delays in processing complaints as matters will need to be passed up through the national agency.

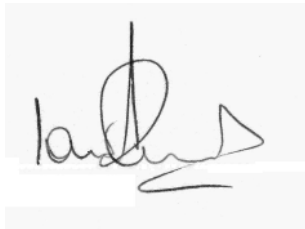
(e) the appropriate role, if any, in the scheme for state and territory registration boards;

The Pharmacy Board of Tasmania considers that the existing State and Territory Boards should continue as they provide local profession specific expertise and knowledge in the best interest of the public. These Boards ensure the maintenance of high standards and are relatively cost effective, particularly in Tasmania where six professions share an independent contractor with well trained staff and efficient processes.

(f) alternative models for implementation of the scheme.

The Board remains of the opinion that the outcomes being sought by COAG could be achieved at significantly less cost, disruption and threat to public safety by the following:

- A national registration data base for each profession which could be administered by an existing state office;
- A formalised National Professional Board for Pharmacy (as proposed), made up of a representative of each Australian jurisdiction and New Zealand and two persons who are not registered health practitioners;
- Continuation of the existing national accreditation body for Pharmacy (the Australian Pharmacy Council);
- Retention of the existing State Boards for each profession;
- A co-located State administration for the smaller professions; (not a Single Entity for all Professions in each state);
- Mirror legislation in each State.
- A “Drivers Licence” model where registration in one jurisdiction is recognized in other jurisdictions



.....
Mr Ian Huett
Chairman
Pharmacy Board of Tasmania