

Consultation on draft guideline: Informing a National Board about where you practise

MAY
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Purpose

The Pharmaceutical Society of Australia (PSA) makes this submission to the Australian Health Practitioner Regulation Agency on the draft guideline¹ on *Informing a National Board about where you practise*. Comments provided by PSA in this submission relate to issues raised by registered pharmacists.

About PSA

PSA is the peak national professional pharmacy organisation representing Australia's 31,000 pharmacists² working in all sectors and locations.

PSA's core functions include:

- providing high quality continuing professional development, education and practice support to pharmacists
- developing and advocating standards and guidelines to inform and enhance pharmacists' practice
- representing pharmacists' role as frontline health professionals.

PSA is also a registered training organisation and offers qualifications including certificate and diploma-level courses tailored for pharmacists, pharmacy assistants and interns.

¹ Australian Health Practitioner Regulation Agency. Consultation on a proposed National Board guideline for informing a National Board about where you practise. 4 April 2018. At: www.pharmacyboard.gov.au/documents/default.aspx?record=WD18%2f25169&dbid=AP&checksum=%2f0%2fHXSX9iUZfmi0HNN%2beg%3d%3d

² Pharmacy Board of Australia. Registrant data. Reporting period: 1 January 2018 – 31 March 2018. At: www.pharmacyboard.gov.au/About/Statistics.aspx

Comments on the draft guideline

PSA understands the proposed guideline relates to the legislative amendments expected to commence in mid-2018 where a registered health practitioner will have an obligation to provide 'practice information' when requested by their National Board.

Overall, PSA supports the draft guideline in providing information about the health practitioner's obligations based on relevant practice arrangements and the types of information that must be provided.

PSA provides the following feedback and suggestions (presented in the table) based on issues which were raised by PSA's member pharmacists, for consideration by the Pharmacy Board. We believe that inclusion or clarification of these points will help ensure the Pharmacy Board's statutory guideline adequately supports all pharmacists.

Issue	PSA's query / comments
Applicability of the guideline	<ul style="list-style-type: none"> The consultation paper outlines (on p. 2) who the guideline is relevant to or intended for. This information was not evident in the draft guideline section of the paper. Generally, guidelines issued by the Pharmacy Board contain a section headed "Who needs to use these guidelines?" and therefore, PSA suggests inclusion of a similar section. A query has been raised as to whether the guideline would apply to pharmacy students undertaking clinical placements. If so, would the student be considered to be providing services in a voluntary capacity or is there a contract or agreement between the university and the preceptor?
Conducting Home Medicines Reviews (HMRs)	<p>Most pharmacists indicated that the explanation of different practice arrangements was useful and appropriate. However, PSA did receive several queries from pharmacists who regularly conduct HMRs. The following is an excerpt of the advice PSA provided internally during its consultation process based on its reading of the consultation paper.</p> <ul style="list-style-type: none"> It is important to remember that your practice (business) "arrangement" (rather than your role or scope of practice) determines what information needs to be submitted when requested. For a pharmacist regularly conducting HMRs, you may be a self-employed practitioner (i.e. you own and manage your business) or you may have a contract or agreement with, for example, a community pharmacy. If both business arrangements apply, you would need to report practice information relevant to both when requested by the Pharmacy Board. If you are self-employed, do not share premises and write HMR reports at home, your home is your place of practice.

