

Respondent

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05:16
Time to complete

1. Name *

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[REDACTED]

4. The National Boards and Ahpra publish submissions at their discretion. We generally publish submissions on our websites to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published. *

- Submission can be published
- Submission NOT to be published

5. Do the draft revised regulatory principles reflect the policy directions issued by CoAG Health Council? If not, how could the principles be improved?

The Pharmacy Guild of Australia (the Guild) believes that the Policy Directions of the paramourcy of public protection and the requirement to consult with patient safety bodies and healthcare consumer bodies on every new and revised registration standard, code and guideline are well reflected in the draft principles. We note that Policy Direction 2019-2 has

also been actioned through this public consultation on the development of the Regulatory Principles for Ahpra.

6. Do the draft revised regulatory principles support Ahpra and the National Boards regulatory decision-making? If not, how could they be improved?

The Guild believes that the principles do support Ahpra and the National Boards in their regulatory decision-making, particularly regarding deterrence and identifying and responding to risks. However, based on feedback from our members, we believe they need to be expanded to include proactively supporting health practitioners to practice in a safe and professional manner. This means including a preventive approach to the principles that would balance the deterrence approach, as we believe this would be most effective in promoting the safe, professional, and quality practice of health practitioners. The Guild supports the specific inclusion in the principles of considering the impact of vulnerable people within the community and Aboriginal and Torres Strait Islander Peoples, and values this as an important step towards Closing The Gap and improving communities' health outcomes.

7. Is the content of the draft revised regulatory principles helpful, clear and relevant?

The Guild believes that the draft revised regulatory principles are clear and relevant. We would certainly reiterate supporting the specific inclusion of considering impacts on Aboriginal and Torres Strait Islander Peoples in the principles as both important and helpful.

8. Is there any content that needs to be changed, added or deleted in the draft revised regulatory principles?

The Guild believes that the principles need to be expanded to address assisting health practitioners to meet their responsibility with adhering to the regulations, with a preventive approach to balance the deterrence approach when upholding the regulations. This inclusion would then guide the Ahpra administrative process with notifications to proactively enhance communication with the health practitioners involved in this process. This proactive communication to practitioners, along with a risk-based approach, would engender trust in Ahpra from practitioners and would be able to prevent more unsafe and unprofessional practice from occurring.

9. Please add any other comments or suggestions for the draft revised regulatory principles.

We would hope to see the principles updated with another consultation in three to five years' time, to ensure it is meeting the needs of Ahpra, the National Boards, all registered health practitioners, and the Australian public.