Submission by the Pharmacy Council of New South Wales

National Health Professional Boards’ consultation on common guidelines and Code of conduct

By email: guidelinesconsultation@ahpra.gov.au

The Pharmacy Council of New South Wales is the statutory body responsible in partnership with the Health Care Complaints Commission, for managing complaints and notifications related to the conduct, performance or health of pharmacists practising in NSW and NSW pharmacy students. The Council is also responsible for the registration of NSW pharmacy businesses.

The Pharmacy Council has considered the Public Consultation Paper released by the 14 National Health Professional Boards on common guidelines and Code of conduct and provides the following comments:

Guidelines for advertising
The Council supports the view that the guidelines for testimonials and advertising should cover both the services and products offered as part of a particular service, or exclusive to a particular service.

Code of conduct
The Council appreciates that others apart from pharmacists might "compound" and that there may be occasions where the raw ingredients accessed might not be of USP or BP standard as would normally be expected. The Council is of the view that the code of conduct should address the prescribing, compounding, supply and administration of agents that are not approved or intended for human therapeutic use, such as those not BP or USP standard, investigational medicines and those labelled ‘not intended for human use’ or ‘for use in animals’.

Noting that on occasions and where the evidence is limited, use of some products in hospitals might be considered "experimental", the Council is of the view that an additional item should be added to the section in the Code regarding the need for informed consent. This is particularly pertinent when a practitioner undertakes to prescribe, compound, supply or administer a product (e.g. a compounded medicine) to a patient which contains an ingredient that is not approved or intended for human therapeutic use.

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