



Communiqué

The fourteenth meeting of the Pharmacy Board of Australia was held on 26 November 2010 at the national office of the Australian Health Practitioner Regulation Agency (AHPRA) in Melbourne.

Guidelines

The Board finalised its 'Guideline on responsibilities of pharmacists when practising as proprietors', having considered feedback received in submissions from stakeholders. The guideline requires that a registered pharmacist who is a proprietor of, or who has a pecuniary interest in a pharmacy business must maintain, and be able to demonstrate an awareness of, the manner in which that pharmacy business is being conducted and, where necessary, intervene to ensure that the practice of pharmacy is conducted in accordance with applicable laws, standards and guidelines. The guideline has been published on the Board's website (www.pharmacyboard.gov.au) under 'Codes and Guidelines'. The Board expects pharmacists who are practising as proprietors to be aware of and meet this guideline.

Registration renewal now due for many pharmacists!

Registration renewal is due by 31 December 2010 for the following groups of registrants:

- pharmacists in New South Wales, Victoria and Tasmania
- pharmacy graduates currently seeking provisional registration and
- interns currently seeking general registration having completed supervised practice hours after passing the registration examination.

This is a peak time for registration renewal for AHPRA. The Board Chair has met with the AHPRA CEO to discuss the Board's concerns about reports of delays in processing renewal applications. The Board noted strategies implemented by AHPRA to streamline registration renewal processing, including introducing automated e-mails for applicants renewing registration. The core reason for processing delays is incomplete applications. To ensure your application is processed as swiftly as possible, make sure your registration application is complete, accurate and submitted on time. The Board published a [media statement](#) updating the profession on registration renewals.

Provisional registration

The Board considered whether provisional registration should expire on 30 November each year (as for general registration) or whether applicants should be granted a full 12 months registration from the time an application is approved. The Board resolved that the latter option should apply. This will enable interns to lodge an application for provisional registration before the commencement of their internship period and complete the internship within the 12 month period of provisional registration. This will also benefit

graduates of courses that end mid-year, as renewal of provisional registration will not be required in November in order to complete the 12 month internship thereby reducing the possibility of their having to pay two fees.

Endorsement of registration for scheduled medicines

There are provisions in the National Law for the Board to endorse the registration of a health practitioner to prescribe scheduled medicines. The practitioner must be registered by the Board as being qualified to administer, obtain, possess, prescribe, sell, supply or use a scheduled medicine or class of scheduled medicines, if the practitioner holds an approved qualification relevant to the endorsement and if the health practitioner complies with any approved registration standard relevant to the endorsement. While the Board does not currently endorse the registration of pharmacists for this purpose, the Board is open to exploring possibilities for endorsement proposed by the profession. To facilitate this, the Board requested its Policies, Codes and Guidelines Committee to develop a framework to guide professional groups and members of the profession in pursuing a proposal for endorsement entitlement under the National Law. Endorsement for scheduled medicines must be approved by the Australian Health Workforce Ministerial Council (the Ministerial Council) which includes the approval of a registration standard relevant to the endorsement. The Board will consult widely on a proposed registration standard before seeking the approval of Ministerial Council.

Supply of Schedule 2 and Schedule 3 medicines

The abuse and misuse of codeine containing products and the diversion of pseudoephedrine containing medications continues to be reported in the media and to the Board in information received from police and health authorities. The documentation of sales of these products can help to minimise diversion of these products.

The Board reminds pharmacists of their obligations in relation to the supply of Schedule 2 and Schedule 3 medicines as outlined in Guideline 4 of the Board's Guidelines on practice specific issues:

Supply of Schedule 2 poisons (pharmacy medicines) and Schedule 3 poisons (pharmacist only medicines)

In addition to any statutory requirements, the Board has regard to the Standards for the Provision of Pharmacy Medicines and Pharmacist Only Medicines in Community Pharmacy (produced by PSA) any substance-specific protocols and quality-assurance standards.

Guidelines

Staff members need to be trained to ask specific questions of intending purchasers of Schedule 2 and Schedule 3 medicines, and any queries that arise from the person's response should be referred to a pharmacist.

The particular statutory obligations on the supply of Schedule 3 medicines by pharmacists must be observed. The pharmacist must be satisfied that there is a therapeutic need. This means more than agreeing to supply the medicine on request, or merely asking patients if they have used the medicine previously and know how to use it.

Only one package is to be supplied at a time unless there are exceptional circumstances, documentation of which ideally should be kept. The sale of multiple packs of Schedule 2 or Schedule 3 medicines (other than in exceptional circumstances), and failure to comply with local jurisdiction regulations applying to Schedule 2 and Schedule 3 medicines and these guidelines may be considered as unprofessional conduct.

Access to data by third parties

The Board's 'Code of conduct for registered health practitioners' outlines pharmacists' obligations in relation to confidentiality, privacy and maintenance of health records. The Board urges pharmacists to exercise extreme caution in allowing third parties to access any data or information relating to patients or clients. Requests for direct access to patient records should be denied unless required by law or unless individual patient consent is provided. Requests from pharmaceutical company representatives should be carefully considered and any information provided must not include personal patient or prescriber details. Pharmacists must not allow unrestricted access to dispensing systems by third parties.

Transfer of registration

With the introduction of the national registration scheme on 1 July 2010, new registration standards were introduced. The standards include a definition of practice. Some pharmacists who currently hold non-practising registration may need to assess their circumstances and apply for general registration. In some cases, individuals may not hold general registration as a pharmacist and may need to consider their current employment circumstances, to determine if they require general registration given the broad definition of practice.

As defined in the registration standards, practice means any role, whether remunerated or not, in which the individual uses their skills and knowledge as a pharmacist in their profession. For the purposes of this registration standard, practice is not restricted to the provision of direct clinical care. It also includes working in a direct nonclinical relationship with clients; working in management, administration, education, research, advisory, regulatory or policy development roles; and any other roles that impact on safe, effective delivery of services in the profession and/or use their professional skills.

The recency of practice standard outlines that applicants who have **changed** their area of practice are required to provide evidence to satisfy the Board of their current competence to practise. This may be in the form of evidence of supervised practice, completion of education courses, assessment and/or an examination.

Pharmacists holding non-practising registration should review this definition of practice carefully to make sure their type of registration is consistent with their circumstances. If necessary, pharmacists can apply for general registration. If you currently hold non-practising registration but as a result of this definition of practice you are required to hold general registration and you will not be changing your current area of practice, then you will not be required to undertake a period of supervised practice. For example, this applies to a pharmacist who currently works in pharmaceutical manufacturing or within a government organisation and who intends to continue in the same role. Other applications will be considered by the Board's Registration and Notifications Committee case by case to determine whether there is a change in practice that requires the completion of any particular registration requirements. If there is no change in practice, the committee may not require the applicant to complete any additional requirements to gain general registration and will confirm this in writing to the applicant.

English Language Skills Registration Standard: Board policy

On 20 April 2010, the Board published on its website, the 'Pharmacy Board of Australia policy for implementation of the English Language Skills Registration Standard.' The Board advised of its intention to ensure that 2009 pharmacy graduates who began their internship and transitioned to the national registration scheme were not disadvantaged by the implementation of the registration standard during their internship. The policy outlined a number of exemptions which may apply. Specifically, the policy outlined that in the case of international students, an exemption to having to produce a current English language test result when applying for general registration may be granted until 31 December 2010. Full details of the conditions of the exemptions are detailed in the policy published on the Board's website (www.pharmacyboard.gov.au).

The Board noted that not all 2009 graduates undertaking internships who transitioned to the national scheme on 1 July 2010 will have gained general registration by 31 December 2010, particularly given the variation in commencement dates of internships amongst this cohort of interns. As a result, the Board resolved to extend the exemption period for international students to **31 March 2011** (refer '2 Policy – international students' of the policy). It applies to the transitioning interns and not to the interns beginning internships under the national scheme after 1 July 2010. Interns seeking general registration from 1 April 2011 must comply with the English language standard. The updated policy has been published on the website and can be located under the registration standards webpage.

Stephen Marty
Chair
8 December 2010