

SUBMISSION TO THE PHARMACY BOARD OF AUSTRALIA

**CONSULTATION DRAFT ON GUIDELINE: RESPONSIBILITIES OF PHARMACISTS
WHEN PRACTISING AS PROPRIETORS**

PURPOSE

1. The Pharmaceutical Society of Australia (PSA) makes this submission to the Pharmacy Board of Australia (“the Board”) in response to the consultation draft of guideline on *Responsibilities of pharmacists when practising as proprietors*.

RECOMMENDATIONS

2. PSA makes the following recommendations in this submission.
- a. A clearer statement is required in relation to who the document is for.
 - b. The requirement for a proprietor to “maintain an awareness” is not adequate and must be strengthened.
 - c. A minimum period of time and frequency that proprietors must fulfil by practising at any pharmacy business they own should be stipulated.
 - d. Consider using the word “accountability” in place of “responsibility” (for the heading and elsewhere).
 - e. Expand the document to include guidance on issues such as workload, professional autonomy and training of staff in the context of ensuring the delivery of a safe pharmacy service to the public.

GENERAL COMMENTS

3. **Application of the guideline.** PSA believes the guidance offered under *Who needs to use this guideline?* is vague and suggests a clearer statement is required. The document should provide guidance to proprietors of a pharmacy business as well as those seeking to become proprietors. We are not certain why it would apply to all registered pharmacists “eligible to own” a pharmacy business as surely this would cover all pharmacists registered in the general category. We also believe advice should be provided regarding how the document relates to entities such as Friendly Society pharmacies.

4. **Accountability.** Under the heading *Summary of guideline*, we believe the statement that “a proprietor must maintain an awareness of the manner in which his or her pharmacy business is being conducted” is inadequate. Firstly, we believe the phrase “maintain an awareness” would be open to interpretation and is likely to generate confusion amongst proprietors and difficulties for the Board in determining compliance.

5. The guideline states that “a pharmacist who owns a pharmacy is practising pharmacy” and that “ownership [...] is a role that impacts on safe, effective delivery of services” and “involves use of professional skills”. If an owner pharmacist never or very infrequently attended a pharmacy he or she owns, PSA believes their behaviour would not meet the standards expected of them by the Board.

6. Even in a highly organised and professionally run pharmacy business, it is difficult to accept that a pharmacist who is not geographically closely associated with a pharmacy could

determine how the business is conducted on a daily basis, and it would be near impossible to intervene in a timely manner should any problems arise.

7. As a profession where an individual is permitted to own multiple pharmacy businesses, PSA believes it is important that the provisions around accountability and responsibility of every owner pharmacist are strengthened.

8. PSA therefore believes that a minimum period of time and frequency that all proprietors must fulfil by practising at or attending any pharmacy business that they own should be stipulated by the Board.

9. Incidentally, the Board may wish to consider the use of the word “responsibilities” (in the current heading) compared to “accountabilities”. In the new Competency Standards (*National Competency Standards Framework for Pharmacists in Australia 2010*) scheduled for release in November 2010, these two terms are used and defined. The critical difference is that “accountability” cannot be delegated while “responsibility” can be.

10. **Other matters for inclusion.** The current draft guideline is very brief and it is not clear if certain issues have been purposefully omitted. For example, the Board could offer guidance on the responsibility of proprietors to:

- a. not impose unreasonable, unmanageable or unsafe work practices on staff including an expectation of achieving script dispensing volumes which are not commensurate with staffing levels;
- b. not exert undue influence on staff to behave in a manner that may compromise their professional autonomy or interfere with exercising professional judgement; and
- c. provide training to all staff which is appropriate for their assigned role.

11. PSA is aware that these issues are mentioned in the Board’s *Guidelines for dispensing of medicines*. However, as they can significantly impact on the delivery of a safe pharmacy service to the public, PSA believes their inclusion here would be welcome and justified. Attention to these types of issues are required in order to achieve a balance between the professional and business aspects of operating a pharmacy and to ensure pharmacists can deliver the best outcomes for consumers.

SUMMARY

12. PSA believes the guideline on *Responsibilities of pharmacists when practising as proprietors* requires strengthening and clarification on a number of issues as outlined in this submission.

Prepared by:

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