

## ***Submission to the Pharmacy Board of Australia: Consultation on the amendment of the Code of conduct for registered health practitioners***

JUNE  
2012

### **Purpose**

The Pharmaceutical Society of Australia (PSA) makes this submission to the Pharmacy Board of Australia (the 'Board') in relation to the proposed amendment to the *Code of conduct for registered health practitioners*.

### **Recommendation**

PSA believes codes of ethics endorsed by the Board and relevant to pharmacists' practice should be included in full as appendices in the Board's *Code of conduct for registered health practitioners*. Therefore we believe the PSA's *Code of ethics for pharmacists* (2011) and the Society of Hospital Pharmacists of Australia's *Code of ethics* (2006) should be included in full as the two current codes specific to the pharmacy profession.

### **Rationale**

PSA's *Code of ethics for pharmacists* was released in October 2011 following a comprehensive review of a previous document which fulfilled a similar purpose. PSA has received positive feedback on the new document in relation to the greater consumer focus and strengthened statements reflecting contemporary pharmacy practice.

PSA regards the implementation of an overarching code common to all health professions registered under the national registration scheme to be of benefit in promoting a common understanding amongst health practitioners and strengthening the practice of each profession. It also provides a more solid base of trust and accountability with consumers and carers.

The practice of each health profession however is not the same in terms of the nature, type or scope of health services provided to consumers. It is therefore not unexpected that some ethical issues may be specific to, or more important for, a particular profession. PSA is firmly of the view that there are ethical issues specific to the pharmacy profession and that our code of ethics appropriately addresses or contextualises these issues.

Traditionally PSA has fulfilled a standards setting role on behalf of the profession by developing codes, standards and guidelines which pharmacy boards have adopted or referred to as a benchmark in upholding their public interest duties. PSA is pleased to note the statement in the consultation document that PSA's code has been endorsed by the Board. This is consistent with the historical partnership and purpose of our organisations. Further, we believe the Board's endorsement of both profession-specific

codes reflects clear recognition of the importance of pharmacy-specific ethical issues and provides a message to members of the profession to consider these issues thoroughly.

The Board's proposed amendments are to add an explanatory paragraph to the Overview section of the Board's code and to include hyperlinks to the websites of the respective codes of ethics. Although we welcome the Board's commitment to implement amendments, PSA is extremely disappointed in that we do not believe the changes go far enough in communicating to the profession the importance of ethical considerations in practice.

While we recognise it is the responsibility of each pharmacist to consider their practice circumstances and meet their obligations, we believe the inclusion of hyperlinks is not adequate. Hyperlinks can also be easily broken. We firmly believe pharmacists should be presented with the full documents and be encouraged to consider them side by side with the Board's Code of conduct.

Additionally, as these documents articulate the values of the pharmacy profession and clearly enunciate the expected standards of behaviour of pharmacists, we believe they can help promote a stronger understanding of the pharmacy profession by other health professions as well as consumers.

## Summary

PSA requests that the Board gives consideration to the inclusion of the profession-specific codes in their entirety in the appendix to the Board's Code of conduct.

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21 June 2012