

## Public consultation

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28 April 2014

### You are invited to provide feedback on this public consultation

Review of registration standards:

- Professional indemnity insurance
- Continuing professional development
- Recency of practice
- Supervised practice arrangements
- Examinations for eligibility for general registration

Review of related guidelines:

- Guidelines on continuing professional development

**Please provide feedback in a word document (or equivalent)<sup>1</sup> to [pharmacyconsultation@ahpra.gov.au](mailto:pharmacyconsultation@ahpra.gov.au) by close of business on Monday 30 June 2014.**

### Public consultation

The Pharmacy Board of Australia (the Board) is releasing the attached consultation paper on the review of its registration standards (Professional indemnity insurance, Continuing professional development, Recency of practice, Supervised practice arrangements and Examinations for eligibility for general registration) and related guidelines (Guidelines on continuing professional development).

You are invited to provide your comments on the consultation paper, including the questions in the paper, by close of business on Monday 30 June 2014. A template document for your response has been provided for your convenience. The feedback from this consultation will be considered by the Board in its

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<sup>1</sup> You are welcome to supply a PDF file of your feedback in addition to the word (or equivalent) file, however we request that you do supply a text or word file. As part of an effort to meet international website accessibility guidelines, AHPRA and National Boards are striving to publish documents in accessible formats (such as word), in addition to PDFs. More information about this is available at [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx).

finalisation of the registration standards and related guidelines, prior to their submission to the Ministerial Council for approval.

### How your submission will be treated

Submissions will generally be published unless you request otherwise. The National Boards publish submissions on their websites to encourage discussion and inform the community and stakeholders. However, the National Boards retain the right not to publish submissions at their discretion, and will not place on their website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.

Before publication, the National Boards will remove personally-identifying information from submissions, including contact details. The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the National Boards.

The National Boards also accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cwlth), which has provisions designed to protect personal information and information given in confidence.

Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

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## Overview of consultation

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28 April 2014

### Review of registration standards:

- Professional indemnity insurance
- Continuing professional development
- Recency of practice
- Supervised practice arrangements
- Examinations for eligibility for general registration

### Review of related guidelines:

- Guidelines on continuing professional development

## Summary

### Purpose of the proposal

1. The Health Practitioner Regulation National Law as in force in each state and territory (the National Law) requires National Boards to develop registration standards about matters, including the:
  - requirements for professional indemnity insurance arrangements for registered health practitioners registered in the profession
  - requirements for continuing professional development for registered health practitioners registered in the profession, and
  - requirements in relation to the nature, extent, period and recency of any previous practice of the profession by applicants for registration in the profession.
2. The National Law enables National Boards to develop registration standards relevant to the eligibility of individuals for registration in the profession or the suitability of individuals to competently practise the profession.
3. The first 10 National Boards to regulate registered health professions under the National Registration and Accreditation Scheme (the National Scheme) developed registration standards that were approved by the Australian Health Workforce Ministerial Council (Ministerial Council) and took effect on 1 July 2010. These standards were scheduled for review at least every three years, in keeping with good regulatory practice.
4. In 2010, the Ministerial Council approved the following Pharmacy Board of Australia registration standards:
  - Professional indemnity insurance arrangements registration standard
  - Continuing professional development registration standard
  - Recency of practice registration standard
  - Supervised practice arrangements registration standard, and
  - Examinations for general registration standard.
5. Section 40 of the National Law requires National Boards to conduct wide-ranging consultation when developing a registration standard, code or guideline. The Board is inviting general comments on its draft revised registration standards (Professional indemnity insurance,

Continuing professional development, Recency of practice, Supervised practice arrangements and Examinations for eligibility for general registration) and related guidelines (Guidelines on continuing professional development). There is an overview before each proposed draft that explains the proposed changes. There are also specific questions about the registration standards and related guidelines which you may wish to address in your response.

6. The Board will consider the consultation feedback on the draft revised registration standards and related guidelines before finalising them for submission to the Ministerial Council for approval

**Please provide feedback in a Word document by email to [pharmacyconsultation@ahpra.gov.au](mailto:pharmacyconsultation@ahpra.gov.au) by close of business on Monday 30 June 2014. A template document for your response has been provided for your convenience.**

## Background

7. There are 14 National Boards that regulate 14 professions under the National Registration and Accreditation Scheme (the National Scheme). Ten professions were regulated nationally under the National Scheme from 1 July 2010, and a further four professions became nationally regulated from 2012:

- Aboriginal and Torres Strait Islander Health Practice Board of Australia (from 1 July 2012)
- Chinese Medicine Board of Australia (from 1 July 2012)
- Chiropractic Board of Australia
- Dental Board of Australia
- Medical Board of Australia
- Medical Radiation Practice Board of Australia (from 1 July 2012)
- Nursing and Midwifery Board of Australia
- Occupational Therapy Board of Australia (from on 1 July 2012)
- Optometry Board of Australia
- Osteopathy Board of Australia
- Pharmacy Board of Australia
- Physiotherapy Board of Australia
- Podiatry Board of Australia, and
- Psychology Board of Australia.

8. The Australian Health Practitioner Regulation Agency (AHPRA) works in partnership with the National Boards to implement the requirements of the National Scheme, which has public safety at its heart. Further information is available at [www.ahpra.gov.au](http://www.ahpra.gov.au).

## Overview

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28 April 2014

### Review of the *Registration standard: Professional indemnity insurance arrangements*

#### Summary of issue

9. The National Law requires the Board to develop a professional indemnity insurance registration standard about the requirements for professional indemnity insurance arrangements for registered health practitioners registered in the profession.
10. Section 129 of the National Law provides that a registered health practitioner must not practise unless they have appropriate professional indemnity insurance arrangements in force.
11. Section 109 of the National Law requires a practitioner applying to renew their registration to make a declaration that they have not practised during the previous registration period without having appropriate professional indemnity insurance arrangements in place. It also requires the practitioner to declare that, if their registration is renewed, they will not practise without appropriate professional indemnity insurance arrangements in place.
12. Section 130 (3)(iii) requires a registered health practitioner to notify the National Board within seven days if appropriate professional indemnity insurance arrangements are no longer in place.
13. The Board's current *Professional indemnity insurance arrangements standard* outlines that a pharmacist must be covered by professional indemnity insurance arrangements providing an approved level of cover not less than \$20 million for any single claim that may be made against the pharmacist. The Board is reviewing this standard to ensure it meets the objectives of the National Law and is worded as simply and clearly as possible.

#### Options statement

The Board has considered a number of options in developing this proposal.

##### Option 1 – Status quo

14. Option 1 would continue with the existing registration standard. The registration standard establishes the Board's requirements for professional indemnity insurance arrangements. The Board has identified a range of minor issues with the current standard, including the ability to clarify the language and structure to make it easier to understand.

##### Option 2 – Proposed revised standard

15. Option 2 would involve the Board submitting a revised registration standard to the Ministerial Council for approval. The registration standard would continue to establish the Board's requirements for professional indemnity insurance arrangements, with additional detail to facilitate pharmacists' understanding of the minimum requirements. This additional detail relates to:
  - third party cover
  - the need to conduct a self-assessment and seek expert advice on whether more than the minimum amount of cover is required
  - the need to notify the Board within seven days if PII arrangements are no longer in place
  - the required evidence of the PII arrangements in place, and
  - consequences if a practitioner does not meet the standard.
16. The review period of the standard has been changed from three to five years, with an earlier review if the need arises. The revised standard has clearer wording and structure to make it easier to understand.

#### Preferred option

17. The Board prefers Option 2.

### Issues for discussion

#### Potential benefits and costs of the proposal

18. The benefits of the preferred option are that the draft revised standard:

- is flexible and user-friendly, in that the options available to meet the standard (e.g. through a pharmacist's own or employer-based professional indemnity insurance arrangements) are clearly stated
- strikes a balance between protecting the public and impact on applicants
- has been reworded to be simpler and clearer.

19. The costs of the preferred option are:

- applicants, other stakeholders, AHPRA and National Boards will need to become familiar with the new standard
- there will likely need to be a period of transition to the proposed revised standard, if approved.

#### Estimated impacts of the draft revised registration standard

20. The changes proposed in the draft revised registration standard are relatively minor, although more significant changes may be proposed through consultation. There is little impact anticipated on practitioners, business and other stakeholders arising from the changes proposed.

### Relevant sections of the National Law

21. Relevant sections of the National Law relating to PII (and summarised above) are:

- Section 38
- Section 109
- Section 129, and
- Section 130.

#### Questions for consideration

22. The Board is inviting feedback on the following questions.

- From your perspective, how is the current registration standard working?
- Is the content and structure of the draft revised standard helpful, clear, relevant and more workable than the current standard?
- Is there any content that needs to be changed or deleted in the draft revised standard?
- Is there anything missing that needs to be added to the draft revised standard?
- Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?
- Do you have any other comments on the draft revised standard?

23. The proposed revised Registration standard: Professional indemnity insurance arrangements is included on page 8 of this consultation paper.

24. The current Professional indemnity insurance arrangements registration standard is published on the Board's website, accessible from [www.pharmacyboard.gov.au/Registration-Standards.aspx](http://www.pharmacyboard.gov.au/Registration-Standards.aspx).

### Attachments

25. The Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation is at [Attachment 1](#).

## Pharmacy Board of Australia

### Registration standard: Professional indemnity insurance arrangements (Draft)

Effective from: <<date>>

Review date: <<date>>

#### Summary

This registration standard explains the Board's requirements for professional indemnity insurance (PII) arrangements under the National Law.

#### Does this standard apply to me?

This standard applies to all registered practising pharmacists with general, limited or provisional registration. Practitioners can be covered by their own or third party PII arrangements.

It does not apply to students or pharmacists with non-practising registration.

#### What must I do?

1. When you practise as a pharmacist, you must be covered by your own or third party PII arrangements that meet this standard:
  - a. for all aspects of your practice
  - b. that cover all locations where you practise
  - c. that provide cover for you whether you are working in the private, non-government and/or public sector, and
  - d. that provide cover for you whether you are practising full time, part time, self-employed, employed, or in an unpaid or volunteer capacity.
2. Your PII cover must include:
  - a. civil liability cover
  - b. unlimited retroactive cover
  - c. automatic reinstatement, and
  - d. run-off cover

**or**

  - e. the equivalent of 2a to 2d above under employer-based PII arrangements, such as self-insurance by public sector employers or occurrence based cover.
3. If you are covered by a third party PII arrangement, you must ensure that the policy meets this standard. However:
  - a. if the third party cover does not meet this standard you must take out additional cover to ensure this standard is met, and
  - b. if any area of your practice is specifically precluded from your PII cover, you **must not** practise in that area.
4. If your PII arrangements are provided by your employer, and you intend to practise outside your stated employment, you must have individual PII arrangements in place to cover that practice, including undertaking practical components of continuing professional development.

#### Amount of cover

1. You are required to have PII arrangements that include a level of cover not less than \$20 million for any single claim (that is, for each claim) that may be made against you.



2. You are expected to conduct a self-assessment and seek expert insurance advice (such as from your insurer) to ensure that you have appropriate cover for your individual practice and the risks involved.

Factors that you should consider include:

- a. your practice setting and the type of services and care you deliver
- b. the patient or client groups involved
- c. the volume of patients or clients to whom treatment, advice, guidance or care is provided
- d. current employment status
- e. previous history of insurance claims and the type of claims made against you in the past, if any
- f. your experience practising the profession
- g. any advice from professional indemnity insurers, professional associations and industrial organisations, including advice about the history and volume of professional liability claims experience by other members of the profession, and
- h. any advice from an insurance broker or insurer.

### Are there exemptions to this standard?

There are no exemptions to this standard. The National Law requires you to have appropriate professional indemnity insurance arrangements in place when you practise as a pharmacist.

### What does this mean for me?

The National Law provides that a registered health practitioner must not practise his/her profession unless appropriate professional indemnity insurance arrangements are in force in relation to the practitioner's practice of the profession (s.129).

### When you apply for registration

When you apply for registration as a pharmacist, you must declare that you will not practise the profession unless you have professional indemnity insurance arrangements in place that meet this standard. This is a requirement under the National Law.

### When you apply for renewal

You will be required to declare annually at renewal:

1. whether during the preceding period of registration, you practised the profession in accordance with the requirements of this standard, and
2. that you will not practise the profession unless you have professional indemnity insurance arrangements in place that meet this standard.

### During the registration period

1. You must notify the Board within seven days if you no longer have appropriate professional indemnity insurance arrangements in place in relation to your practice that meet the requirements of this standard (s. 130).
2. Your compliance with this standard may be audited from time to time.

### Evidence

The Board may, at any time, require you to provide evidence that you have appropriate professional indemnity insurance arrangements in place.

If you hold private insurance in your own name, you must retain documentary evidence of this insurance.

If you are covered by a third party insurance arrangement, you are not required to obtain documentary evidence of the insurance policy unless the Board requests it, however, there may be circumstances when you will be required to seek the documentation from that third party. If requested by the Board, you must provide a certified copy of the certificate of currency or a letter from the third party declaring that you are covered.

### What happens if I don't meet this standard?

The National Law establishes possible consequences if you don't meet this standard, including that:

- the Board can impose a condition or conditions on your registration or can refuse your application for registration or renewal of registration when you don't meet a requirement in an approved registration standard for pharmacy (sections 82 and 112 of the National Law)
- practising without appropriate PII arrangements, or failing to notify the Board within seven days that appropriate PII arrangements are no longer in place, is not an offence but may be behaviour for which health, conduct or performance action may be taken (section 129 and 130 of the National Law), and
- registration standards, codes or guidelines may be used in disciplinary proceedings against you as evidence of what constitutes appropriate practice for pharmacy (section 41 of the National Law).

### Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<date>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### Definitions

**Automatic reinstatement** is a provision in policies which allows for the limit of indemnity (amount insured) to be reinstated for new, unrelated claims, after one or more claims has been paid to the limit of the indemnity.

**Civil liability insurance** means insurance that covers the costs of liability incurred by the insured arising from civil claims seeking compensation for personal injury, harm or loss incurred, where the claim arises directly from an alleged act, error or omission committed in the conduct of the practitioner's practice or professional business during the policy period. Civil liability cover includes cover for legal expenses incurred in defence or settlement of a civil claim and for damages payable.

**Claims made policy** means a policy that is in place at the time the claim is made, or when the circumstances that gave rise to the claim were notified to the insurer with prior events covered by continuity of cover, retroactive clauses, and/or run-off cover, whichever is applicable in the circumstances.

**Occurrence-based policy** means a policy that is in place when the event which is the subject of the claim occurred, even if the policy has not been renewed.

**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 non-clinical 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.

**Professional indemnity insurance arrangements** means arrangements that secure for the practitioner's professional practice insurance against civil liability incurred by, or loss arising from, a claim that is made as a result of a negligent act, error or omission in the conduct of the practitioner. This type of insurance is available to practitioners and organisations across a range of industries and covers the cost and expenses of defending a legal claim, as well as any damages payable. Some

government organisations under policies of the owning government are self-insured for the same range of matters.

**Retroactive cover** means PII arrangements which cover the insured against claims arising out of or in consequence of activities that were undertaken in the course of the practitioner's professional practice, prior to the date of the commencement of the insurance.

**Run-off cover** means insurance that protects a practitioner who has ceased a particular practice against claims that arise out of or are a consequence of activities that were undertaken when he/she was conducting that practice. This type of cover may be included in a PII policy or may need to be purchased separately.

**Third party cover** means the cover that an individual holds through a third party's insurance arrangement, such as through an employer, education provider or union.

### Review

This standard will be reviewed at least every five years.

Last reviewed: <<date>>

This standard replaces the previously published registration standard from <<date>>.

## Overview

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28 April 2014

### Review of the *Registration standard: Continuing professional development*

#### Summary of issue

26. The National Law requires the Board to develop a registration standard about the requirements for continuing professional development (CPD) for registered health practitioners registered in the profession. The registration standard is part of the regulatory framework for the pharmacy profession.
27. Section 128 of the National Law provides that a registered health practitioner (other than a practitioner who holds non-practising registration) must undertake the continuing professional development required by the Board's CPD registration standard.
28. Section 109 of the National Law requires practitioners applying to renew their registration to make a declaration that they have completed the CPD required by the relevant National Board in the previous registration period.
29. The Board's current Continuing professional development registration standard states that a registered pharmacist is required to complete 40 CPD credits for the period ending 30 September 2013. The Board is reviewing its standard to ensure it is based on the best available evidence, meets the objectives of the National Law and is worded as simply and clearly as possible.
30. The Board, in conjunction with the other National Boards who are reviewing their CPD registration standards, commissioned a review of the literature on the effectiveness of CPD. The Board has taken this information into account in its review of the registration standard and guidelines. This includes the Board's decision at this stage to not introduce a mandatory requirement for a proportion of a pharmacist's CPD to be accredited, as this requirement is not sufficiently justified by the current literature.
31. As the available evidence does not provide definitive answers to issues such as the most effective amount and types of continuing professional development, the Board has also considered its experience with the standard over the past three years in its review. The National Boards and AHPRA will continue to monitor developments in this area to inform the Board's standard.

#### Options statement

32. The Board has considered a number of options in developing this proposal.

##### **Option 1 – Status quo**

33. Option 1 would continue with the existing registration standard. The registration standard established the Board's initial requirements for CPD under the National Law. However, the Board has now identified a range of opportunities to improve the current standard, including the ability to clarify the language and structure to make it easier to understand.

##### **Option 2 – Proposed revised standard**

34. Option 2 would involve the Board submitting a revised registration standard to the Ministerial Council for approval. The registration standard would continue to establish the Board's requirements for CPD, including maintaining the annual requirement of 40 CPD credits.
35. The revised standard continues to specify the Board's current limit on Group 1 activities, as outlined in the current guidelines (which are part of this review), however, this requirement has

been rephrased to state the minimum amount of Group 2 and Group 3 activities to be undertaken, in order to improve clarity in both the revised standard and guidelines.

36. The revised standard provides additional detail to facilitate pharmacists' understanding of the minimum requirements, including the consequences if a pharmacist does not meet the standard. It specifies that pharmacists must maintain records of CPD for a minimum of three years. The revised standard articulates the requirement for pharmacists to plan their CPD annually, including identification of their professional development needs through utilisation of the National Competency Standards Framework for Pharmacists in Australia, 2010, and devising a continuing professional development plan that address these needs.
37. The review period of the standard has been changed from three to five years with an earlier review if the need arises. The revised standard also has clearer wording and structure to make it easier to understand.

### **Preferred option**

38. The Board prefers Option 2.

### **Issues for discussion**

#### **Potential benefits and costs of the proposal**

39. The benefits of the preferred option are that the draft revised standard:

- is flexible and user-friendly
- strikes a balance between protecting the public and impact on applicants
- has been reworded to be simpler and clearer.

40. The costs of the preferred option are:

- applicants, other stakeholders, AHPRA and National Boards will need to become familiar with the new standard.

#### **Estimated impacts of the draft revised registration standard**

41. The changes proposed in the draft revised registration standard are relatively minor, although more significant changes may be proposed through consultation. There is little impact anticipated on practitioners, business and other stakeholders arising from the changes proposed.
42. The Board's existing Guidelines on continuing professional development require pharmacists who undertake self-directed learning to develop a 'self-directed learning plan'. However, the draft revised standard will require every pharmacist to develop a continuing professional development plan, which will require pharmacists to be familiar with, and able to use, the National Competency Standards Framework for Pharmacists in Australia, 2010.

### **Relevant sections of the National Law**

43. The relevant sections of the National Law relating to CPD (and summarised above) are:

- Section 38
- Section 109, and
- Section 128.

### **Questions for consideration**

44. The Board is inviting feedback on the following questions.

- From your perspective, how is the current registration standard working?

- Is the content and structure of the draft revised standard helpful, clear, relevant and more workable than the current standard?
  - Is there any content that needs to be changed or deleted in the draft revised standard?
  - Is there anything missing that needs to be added to the draft revised standard?
  - Is the proposed requirement for pharmacists to maintain CPD records for a minimum of three years appropriate? Would an alternative period be considered more appropriate, for example five years?
  - Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?
  - Do you have any other comments on the draft revised standard?
45. The proposed revised Registration standard: Continuing professional development is included on page 15 of this consultation paper.
46. The current Continuing professional development registration standard is published on the Board's website, accessible from [www.pharmacyboard.gov.au/Registration-Standards.aspx](http://www.pharmacyboard.gov.au/Registration-Standards.aspx).

### Attachments

47. The Board's Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation is at [Attachment 1](#).

## Pharmacy Board of Australia

### Registration standard: Continuing professional development (Draft)

Effective from: <<date>>

Review date: <<date>>

#### Summary

This registration standard sets out the Board's minimum requirements for continuing professional development (CPD) for pharmacists to competently and safely provide services to the public.

#### Does this standard apply to me?

This standard applies to applicants for general registration and all registered pharmacists, including those changing registration type.

It does not apply to pharmacists with non-practising registration or to students.

#### What must I do?

Individuals applying for general registration are required to declare whether they meet this standard.

Pharmacists who are seeking to renew their registration must declare whether they have met this standard during the previous registration period.

To meet this standard you must:

1. plan your CPD on an annual basis by:
  - a) reflecting on the role you perform and the services you provide, against the current *National Competency Standards Framework for Pharmacists in Australia* to identify relevant competencies
  - b) identifying professional development needs relevant to these identified competencies, and
  - c) identifying suitable CPD activities which address your professional development needs.
2. complete CPD activities that have an aggregate value of 40 or more CPD credits during each 12 month CPD period ending 30 September, and which:
  - a) consist of at least 20 CPD credits from Group 2 or Group 3 activities
  - b) consist of a range of types of activities (examples may include education programs, seminars, workshops, lectures, conferences, discussion groups, multimedia or website-based programs, research and preparation for the publication of an article in a peer-reviewed journal, review of professional journals and reference texts)
  - c) are of significant intellectual or practical content and deal primarily with matters directly related to the practice of pharmacy
  - d) are conducted by persons who are qualified by practical or academic experience in the material covered and / or comprise subject material from reputable sources
  - e) are relevant to your scope of practice, and
  - f) address your professional development needs, upon reflection on how the activity has impacted your practice.

#### Are there exemptions to this standard?

The Board may grant an exemption or variation from this standard in exceptional circumstances, such as serious illness or bereavement that result in a substantial absence from practice.

## What does this mean for me?

### When you apply for registration

You need to meet this standard when you apply for general registration. However, you don't need to meet this standard when you apply for provisional or limited registration for the first time in Australia.

### When you apply for renewal

When you apply to renew your registration, you are required to declare whether you meet this registration standard.

### During the registration period

Your compliance with this standard may be audited from time to time. It may also be checked if the Board receives a notification about you.

### Evidence

You should maintain records of your CPD activity for a minimum of three years.

## What happens if I don't meet this standard?

The National Law establishes possible consequences if you don't meet this standard, including that:

- a Board can impose a condition or conditions on your registration or can refuse an application for registration or renewal of registration when you do not meet a requirement in an approved registration standard for the profession (sections 82 and 112 of the National Law)
- a failure to undertake the CPD required by this standard is not an offence but may be behaviour for which health, conduct or performance action may be taken by the Pharmacy Board of Australia (section 128 of the National Law), and
- registration standards, codes or guidelines may be used in disciplinary proceedings against you as evidence of what constitutes appropriate practice or conduct for the pharmacy profession (section 41 of the National Law).

## Guidelines on continuing professional development for pharmacists

The *Guidelines on continuing professional development* provide more information about how to meet this standard. You are expected to understand and apply these guidelines together with this registration standard.

### Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<date>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### More information

The Board has published further information on continuing professional development to assist pharmacists to understand this registration standard and its associated guidelines.

### Definitions

**Continuing professional development** is the means by which members of the profession maintain, improve and broaden their knowledge, expertise and competence, and develop the personal and professional qualities required throughout their professional lives.

**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 non-clinical 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.

**Scope of practice** means the professional role and services that an individual health practitioner is educated and competent to perform.

### Review

This standard will be reviewed at least every five years.

Last reviewed: <<date>>

This standard replaces the previously published registration standard from <<date>>.

28 April 2014

## Review of the *Guidelines on continuing professional development*

### Summary of issue

48. Section 35 of the National Law allows the National Boards to develop or approve standards, codes and guidelines for the health profession, including the development and approval of codes and guidelines that provide guidance to health practitioners registered in the profession. Section 39 states that a National Board may develop and approve codes and guidelines to provide guidance to the health practitioners it registers; and about other matters relevant to the exercise of its functions.
49. The Board's Guidelines on continuing professional development were developed under Section 39 of the National Law to provide guidance on CPD to the health practitioners it registers. These guidelines supplement the registration standard by setting out:
- the information that pharmacists must record when undertaking CPD, and
  - the types and range of CPD activities that may be undertaken by pharmacists in order to meet the Board's annual CPD requirements.
50. The Board is reviewing these guidelines to ensure it adequately supports pharmacists in meeting the requirements set out in the CPD standard, and that it is worded as simply and clearly as possible.

### Options statement

51. The Board has considered a number of options in developing this proposal.

#### Option 1 – Status quo

52. Option 1 would continue with the existing guidelines. These guidelines supplement the current standard (which is part of this review), which established the Board's initial requirements for continuing professional development under the National Law. However, the Board has now identified a range of opportunities to improve the current guidelines, including the ability to clarify the language and structure to make them easier to understand.

#### Option 2 – Proposed revised guidelines

53. Option 2 would involve the Board publishing revised guidelines. The revised guidelines would continue to supplement the standard, with no substantive changes.
54. The revised guidelines have clearer wording and structure to make them easier to understand, and provide additional guidance on:
- development of a continuing professional development plan
  - the additional responsibilities when a pharmacist chooses to undertake non-accredited CPD
  - the need to maintain competency in the two universal domains of the National Competency Standards Framework for Pharmacists in Australia
  - CPD records to be kept, and evidence of CPD undertaken which may be required by the Board
  - temporary absence from practice, and
  - the references to other publications which provide additional guidance for pharmacists to assist them in meeting the Board's CPD requirements.
55. The Board's current limit of Group 1 activities (not more than 50% of the annual CPD credits required for renewal of registration) has been maintained in the revised guidelines. However, this requirement has been rephrased to state the minimum amount of Group 2 and Group 3 activities to be undertaken by pharmacists, to improve clarity.

56. The review period of the guidelines has been changed from three to five years with an earlier review if the need arises. The guidelines also have clearer wording and structure to make them easier to understand.

### **Preferred option**

57. The Board prefers Option 2.

### **Issues for discussion**

#### **Potential benefits and costs of the proposal**

58. The benefits of the preferred option are that the draft revised guidelines:

- are flexible and user-friendly
- strike a balance between protecting the public and impact on applicants
- have been reworded to be simpler and clearer
- provide additional guidance to practitioners on several matters.

59. The costs of the preferred option are:

- applicants, other stakeholders, AHPRA and National Boards will need to become familiar with the new guidelines
- there will probably need to be a period of transition to the proposed revised guidelines.

#### **Estimated impacts of the draft revised guidelines**

60. The changes proposed in the draft revised guidelines are relatively minor, although more significant changes may be proposed through consultation. There is little impact anticipated on practitioners, business and other stakeholders arising from the changes proposed.

### **Relevant sections of the National Law**

61. Relevant sections of the National Law relating to the guidelines (and summarised above) are:

- Section 35, and
- Section 39.

### **Questions for consideration**

62. The Board is inviting feedback on the following questions.

- From your perspective, how are the current guidelines working?
- Is the content and structure of the draft revised guidelines helpful, clear, relevant and more workable than the current guidelines?
- Is there any content that needs to be changed or deleted in the draft revised guidelines?
- Should the Board change the limitation in relation to the percentage of Group 1 activities that can be claimed as part of the annual CPD credits requirement (now rephrased to state the minimum amount of Group 2 and Group 3 activities to be undertaken by pharmacists)? If so, what should this be changed to and why?
- Should the Board introduce a specific minimum requirement for Group 3 activities? If you believe the Board should, what should the minimum amount or proportion be? Please provide further information which explains how this could be achieved by pharmacists in all areas of practice.
- Are the definitions for CPD activity groups (Groups 1, 2 and 3) satisfactory? If not, what requires further clarification, and what are your recommendations?
- Is there anything missing that needs to be added to the draft revised guidelines?
- Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?
- Do you have any other comments on the draft revised guidelines?

63. The proposed revised Guidelines on continuing professional development is on page 20 of this consultation paper.

64. The current Guidelines on continuing professional development is published on the Board's website, accessible from [www.pharmacyboard.gov.au/Codes-Guidelines.aspx](http://www.pharmacyboard.gov.au/Codes-Guidelines.aspx).

# Pharmacy Board of Australia

## Guidelines on continuing professional development (Draft)

Effective from: <<date>>

Review date: <<date>>

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### Introduction

These guidelines have been developed by the Pharmacy Board of Australia (the Board) under section 39 of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law).

These guidelines:

- a) supplement the requirements set out in the Board's *Registration standard: Continuing professional development* (CPD standard)
- b) supplement the requirements set out in the National Law at sections 128 and 109(1)(iii) in relation to pharmacists' obligations to undertake continuing professional development (CPD) and to advise the Board when applying for renewal of registration that the Board's CPD requirements have been met, and
- c) provide guidance to pharmacists in relation to a matter of professional practice, not set down in the legislation or a registration standard, which under section 41 of the National Law, can be used in disciplinary proceedings under the National Law as evidence of what constitutes appropriate professional conduct or practice for pharmacists.

*Note: As part of the agreement by the Council of Australian Governments to provide for the National Law, pharmacy ownership, regulation of premises, inspections and related matters do not form part of the National Law. Each jurisdiction will have separate legislation and guidelines for these purposes.*

### Who needs to use these guidelines?

These guidelines were developed to provide guidance to applicants for general registration and all registered pharmacists, including those changing registration type.

They do not apply to pharmacists with non-practising registration or to students.

## What happens if I do not comply with these guidelines?

Pharmacists must comply with all legislation relevant to the practice of pharmacy in the jurisdiction where the practice occurs. Additionally, pharmacists are expected to be aware of and comply with the profession's standards (including any other standards or guidelines referred to in those standards), as relevant to their scope of practice and type of registration. The pharmacy practice standards can be accessed on the websites of the relevant professional bodies:

- [Pharmaceutical Society of Australia \(PSA\)](#), and
- [The Society of Hospital Pharmacists of Australia \(The SHPA\)](#)

Non-compliance with these guidelines and pharmacy practice standards may be notified to the Board for appropriate action under the National Law. Under section 41 of the National Law, these guidelines can be used in disciplinary proceedings under the National Law as evidence of what constitutes appropriate professional conduct or practice for pharmacists. When considering notifications (complaints) against pharmacists, the Board will give consideration to whether a breach of these guidelines has taken place. The Board will also have regard to the legislation and practice standards relevant to pharmacy practice.

Further information for pharmacists regarding the possible outcomes of notifications is available on the website of the Australian Health Practitioner Regulation Agency (AHPRA) ([www.ahpra.gov.au](http://www.ahpra.gov.au)).

## Summary of guidelines

The Board's CPD standard requires registered pharmacists to complete CPD activities that have an aggregate value of 40 or more CPD credits during each 12 month CPD period ending 30 September.

These guidelines outline the specific requirements that must be met by pharmacists when undertaking CPD to meet the Board's minimum annual CPD requirements.

These guidelines detail the information that pharmacists must record when undertaking CPD to ensure they:

- meet the Board's CPD requirements when they apply to renew their registration<sup>2</sup>, and
- maintain satisfactory records of the CPD they have undertaken, which they will need to provide to the Board during its audit of the registration standards, including the CPD standard.

These guidelines also specify the types and range of CPD activities pharmacists are required to undertake to meet the Board's annual CPD requirements for renewal of registration.

## Guidelines

Learning and development occurs throughout a pharmacist's career. CPD is an important foundation of lifelong learning and assists pharmacists to maintain competence to practise.

In addition to complying with the Board's CPD standard and these guidelines, pharmacists should also meet the relevant requirements of the Board's *Code of conduct for pharmacists* outlined in Section 7 'Maintaining professional performance'.

### 1 [Developing a continuing professional development plan and undertaking self-directed professional development](#)

Pharmacists should review the current *National Competency Standards Framework for Pharmacists in Australia* to identify the competencies relevant to the role they perform and the services they provide, and determine their professional development needs. They should set out a clear plan of education activities they intend to undertake to meet their identified professional development needs. During the CPD period, pharmacists are encouraged to regularly review and amend if required, their

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<sup>2</sup> Pharmacists are required to include a declaration that they have complied with their CPD obligations with their application for registration renewal.

continuing professional development plan (CPD plan) to ensure that their needs are being met and to incorporate additional needs which evolve.

Maintaining an adequate record of activities enables pharmacists to review whether their chosen self-directed professional development activities have met their needs as outlined on their CPD plan.

Pharmacists should ensure that they meet the Board's CPD standard by:

- maintaining their CPD plan
- maintaining detailed records of activities undertaken, and
- ensuring that these records can be verified.

## 2 Accredited and non-accredited CPD

In order to meet the Board's CPD standard and CPD requirement for renewal of registration, pharmacists may choose to undertake accredited CPD activities offered by CPD providers.

As requested by the Board, the Australian Pharmacy Council authorises other organisations to accredit pharmacy CPD activities of CPD providers on their behalf. The Board acknowledges that pharmacists may not have access to accredited CPD activities across the various activity groups or that cover the entire scope of the practice of pharmacy as defined in the Board's CPD standard.

*(Note: At this stage the Board has not set a mandatory requirement for a proportion of a pharmacist's CPD activities to be accredited CPD. However, it may choose to do so following a subsequent review of these guidelines).*

The accreditation of CPD activities provides an assurance to pharmacists that an activity has been reviewed for its educational quality and for its relevance to a pharmacist's practice.

When non-accredited activities are considered, it is the pharmacist's responsibility to assess potential activities for quality, suitability and relevance, and to determine whether these will address their individual professional development needs. Activities which are susceptible to commercial bias such as sponsor-driven product detailing to pharmacists, are unlikely to be of sufficient quality to contribute towards meeting the requirements of the CPD registration standard.

## 3 Range of activities

The Board recommends that pharmacists undertake a variety of activity types and, where possible, choose across a range of CPD activity groups (Groups 1, 2 and 3 — see 'Definitions') and include interaction with peers. An activity undertaken in one CPD group may be linked to an activity in another CPD group in order to broaden exposure to different learning methods and achieve more varied and enhanced outcomes from CPD undertaken. The Board strongly suggests that pharmacists do not achieve all of the annual CPD credits required for renewal of registration from the one event or source (e.g. an annual conference).

At least 20 of the 40 CPD credits required to meet the Board's CPD registration standard must be achieved by undertaking Group 2 or Group 3 CPD activities.

In determining the intellectual significance of a CPD activity, consideration should be given to its duration. Adequate time should be spent on a CPD activity to ensure consideration of material in suitable depth, which may vary depending on the nature of the topic pursued.

Pharmacists are reminded of their obligation to maintain competency in the two universal domains of the *National Competency Standards Framework for Pharmacists in Australia* endorsed by the Board — *Domain 1 Professional and ethical practice* and *Domain 2 Communication, collaboration and self-management*.

## 4 Records of CPD undertaken

Maintaining detailed and verifiable records for all CPD undertaken is the pharmacist's responsibility.

Records of participation in CPD must include details under all fields specified by the Board. All records must be verifiable, and should be kept for a minimum of three years.

- (a) Records maintained by participants or by providers of CPD on behalf of participants must include details of CPD activities under the following fields when submitted by pharmacists who are audited by the Board.

<b>Area identified requiring professional development</b> (relevant competencies from competency standards framework)
<b>Start and finish date of activity</b>
<b>Source or provider details</b> (e.g. journal name, provider name)
<b>Type of activity</b> (e.g. journal article, seminar, lecture, workshop)
<b>Topics covered during activity</b> (specify all topics covered)
<b>Accreditation status</b> (accredited or non-accredited)
<b>CPD activity group (Group 1, 2 or 3)</b>
<b>How activity has impacted practice</b>
<b>Pharmacy Board of Australia CPD credits</b>

- (b) When further information about CPD records is requested by the Board, pharmacists may be required to provide evidence of:

- attendance or completion of CPD activities, or
- a CPD plan that demonstrates the relevance of CPD activities undertaken to their scope of practice.

## 5 Temporary absence from practice

Before returning to practice after an absence, pharmacists have an obligation to assess what changes there have been to practice and what CPD they need to undertake to ensure that they are suitably prepared to return to practice. CPD activities for pharmacists returning to practice must be designed to maintain and update knowledge, clinical judgement and technical skills.

Pharmacists who practise for only part of a registration period have an obligation to ensure they remain up-to-date and competent to practise, and must meet the Board's CPD requirements. These pharmacists will be required to declare that they meet the requirements when they apply to renew their registration.

Pharmacists who are absent from practice for a period between one and three years are required to:

- complete a minimum of one year's quota of CPD activities relevant to the intended scope of practice prior to recommencing practice, as well as
- meet the requirements specified in the Board's *Recency of practice registration standard*.

An absence of more than three years is not regarded by the Board as a temporary absence. Such practitioners will be required to meet the requirements of the Board's *Recency of practice registration standard* and any supporting guidelines issued by the Board.



## Definitions

The Board uses the following classification for CPD activities and allocated CPD credit levels.

### Group 1: information accessed without assessment

- Descriptor:** didactic presentations, and activities with little or no attendee interaction
- Examples:** attending or listening to continuing education (CE) presentations; attending conferences or seminars; reading journals; preparing and delivering teaching material to students or interns if this activity addresses your professional development needs
- CPD credits:** one Pharmacy Board of Australia CPD credit per hour of activity

### Group 2: knowledge or skills improved with assessment

- Descriptor:** activities where the participant's acquisition of knowledge or skills can be demonstrated, for example through successful completion of some form of assessment. The activities provide for the measurement of a participant's achievement of the professional development objectives and individual feedback on performance in assessments
- Examples:** undertaking assessment (e.g. multiple choice questions or other types of structured assessments related to CE events or journal reading, either formal or self-assessment); gaining some form of credentialing by assessment or examination; undertaking formal postgraduate courses; participating in an interactive workshop; undertaking a case study (e.g. National Prescribing Service), preparing for external review (e.g. Australian Council on Healthcare Standards, Quality Care Pharmacy Program); maintaining a log or journal in relation to an activity to demonstrate the achievement, problem management and knowledge acquired
- CPD credits:** two Pharmacy Board of Australia CPD credits per hour of activity

### Group 3: quality or practice-improvement facilitated

- Descriptor:** activities where an assessment of existing practice (of an individual or within a pharmacy practice), and the needs and barriers to changes in this practice, is undertaken prior to the development of a particular activity. As a result, the activity addresses identified professional development needs with a reflection post-activity to evaluate practice change or outcomes resulting from the activity. Such an activity most likely will extend over a number of weeks or months.
- Examples:** work undertaken for the presentation of a paper or poster at a conference or publication of an article in a peer-reviewed journal; providing the lead in workplace quality or practice improvement activities through an activity such as a drug utilisation review; having active involvement in a special interest group leading to demonstrated practice change; using information obtained from a CPD activity to facilitate quality or practice improvement e.g. a protocol identified through a CPD activity, implementing the protocol to improve practice and evaluating resulting practice change or outcomes
- CPD credits:** three Pharmacy Board of Australia CPD credits per hour of activity

**Continuing professional development** is the means by which members of the profession maintain, improve and broaden their knowledge, expertise and competence, and develop the personal and professional qualities required throughout their professional lives.

**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 non-clinical 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.

**Scope of practice** means the professional role and services that an individual health practitioner is educated and competent to perform.

## References

Pharmacy Board of Australia Registration standard: Continuing professional development

Pharmacy Board of Australia Registration standard: Recency of practice

Pharmacy Board of Australia Code of Conduct for registered health practitioners

Pharmacy Board of Australia Frequently asked questions - Continuing professional development

Pharmacy Board of Australia Frequently asked questions for pharmacy interns - Continuing professional development

National Competency Standards Framework for Pharmacists in Australia (current version)

## Review

These guidelines will be reviewed at least every five years.

Last reviewed: <<date>>

These guidelines replace the previously published guidelines from <<date>>.

The Board acknowledges the contribution of the Australian Pharmacy Liaison Forum in the development of these guidelines.

## Overview

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28 April 2014

### Review of the *Registration standard: Recency of practice*

#### Summary of issue

65. The National Law requires the Board to develop a registration standard about the requirements for the nature, extent, period and recency of any previous practice by practitioners applying for registration in the profession. The registration standard is part of the regulatory framework for the pharmacy profession.
66. Section 109 of the National Law requires a practitioner applying to renew their registration to declare that they have met the recency of practice requirements in the Board's registration standard.
67. The Board's current Recency of practice registration standard states that applicants who have not practiced pharmacy for more than 450 hours within the previous three years or changed their area of practice are required to provide evidence to satisfy the Board of their current competence to practice.
68. The Board is reviewing its standard to ensure it is based on the best available evidence, meets the objectives of the National Law and is worded as simply and clearly as possible.
69. The Board, in conjunction with the other National Boards who are reviewing their recency of practice registration standards, commissioned a review of the literature on recency of practice requirements. The Board has taken this information into account in its review of the registration standard. The available evidence does not provide definitive answers to issues such as the amount of practice that a practitioner must undertake to remain competent so the Board has also considered its experience with the standard over the past three years and how best to protect the public given current knowledge limitations. The National Boards and AHPRA will continue to monitor developments in this area to inform the Boards' standards.

#### Options statement

70. The Board has considered a number of options in developing this proposal.

#### Option 1 – Status quo

71. Option 1 would continue with the existing registration standard. The registration standard established the Board's initial requirements for recency of practice under the National Law. However, the Board has now identified a range of issues with the current standard, including the ability to clarify the language and structure to make it easier to understand.

#### Option 2 – Proposed revised standard

72. Option 2 would involve the Board submitting a revised registration standard to the Ministerial Council for approval. The registration standard would continue to establish the Board's requirements for recency of practice, with the following changes:
  - inclusion of an alternative option for applicants to meet the minimum practice requirements (150 hours during the previous 12 months, in addition to the current option of 450 hours during the previous three years)
  - specifying that the Board considers that practice in Australia or New Zealand meets the requirements of the standard, and that consideration on a case-by-case basis would be given to whether practice in other countries also meets the requirements of the standard
  - provision of additional detail on the process to be followed, and other possible consequences, if a practitioner does not meet the standard
  - clearer wording and structure of the standard to make it easier to understand
  - a change in review period from three to five years with an earlier review if the need arises.

#### Preferred option

73. The Board prefers Option 2.

### Issues for discussion

#### Potential benefits and costs of the proposal

74. The benefits of the preferred option are that the draft revised standard:

- is more flexible and user-friendly, in that an alternative option for applicants to meet the minimum practice requirements is provided
- strikes a balance between protecting the public and impact on applicants
- has been reworded to be simpler and clearer.

75. The costs of the preferred option are:

- applicants, other stakeholders, AHPRA and National Boards will need to become familiar with the new standard
- there will likely need to be a period of transition to the proposed revised standard, if approved.

#### Estimated impacts of the draft revised registration standards

76. The majority of the changes proposed in the draft revised registration standard are relatively minor and are anticipated to have little impact on practitioners, business and other stakeholders. More significant changes may be proposed through consultation.

77. The provision of an alternative option for applicants to meet the minimum practice requirements (completion of a minimum of 150 hours of practice during the previous 12 months) will make it easier for applicants to demonstrate recency of practice, however the Board is of the view that this change will not impact on protection of the public.

### Relevant sections of the National Law

78. The relevant sections of the National Law relating to recency of practice (and summarised above) are:

- Section 38, and
- Section 109.

#### Questions for consideration

79. The Board is inviting feedback on the following questions.

- From your perspective, how is the current registration standard working?
- Is the content and structure of the draft revised standard helpful, clear, relevant and more workable than the current standard?
- Is there any content that needs to be changed or deleted in the draft revised standard?
- Is there anything missing that needs to be added to the draft revised standard?
- Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?
- Do you have any other comments on the draft revised standard?

80. The proposed revised Registration standard: Recency of practice is at page 28 of this consultation paper.

81. The current Recency of practice registration standard is published on the Board's website, accessible from [www.pharmacyboard.gov.au/Registration-Standards.aspx](http://www.pharmacyboard.gov.au/Registration-Standards.aspx).

### Attachments

82. The Board's Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation is at [Attachment 1](#).

## Pharmacy Board of Australia

### Registration standard: Recency of practice (Draft)

**Effective from:** <<date>>

**Review date:** <<date>>

This registration standard sets out the Board's minimum requirements for recency of practice for pharmacists to competently and safely provide services to the public.

#### Does this standard apply to me?

This standard applies to pharmacists applying for renewal of general registration and applicants for general registration, including practitioners changing registration type. It does not apply to applicants applying for or renewing non-practising, provisional or limited registration or to students.

#### What must I do?

To meet this standard you must have practised a minimum of:

- a) 450 hours in the three year period prior to applying for general registration or renewal of general registration, or
- b) 150 hours in the 12 month period prior to applying for general registration or renewal of general registration.

The Board considers that practice in Australia or New Zealand in your intended scope of practice meets the requirements of this standard. The Board will also give consideration on a case-by-case basis as to whether practice in other countries meets the requirements of this standard.

In addition to meeting the Board's minimum requirements for recency of practice, it is imperative that you recognise and work within the limits of your competence and maintain adequate knowledge and skills to provide safe and effective care.

#### Are there exemptions to this standard?

There are no exemptions to this standard. The section below "What happens if I don't meet this standard?" explains what you need to do if you don't meet this standard and wish to continue or return to practice.

#### What does this mean for me?

##### When you apply for registration

When you apply for general registration as a pharmacist, you must meet this registration standard. This includes pharmacists who are applying to change their type of registration to general registration.

##### When you apply for renewal

When you apply to renew your general registration, you are required to declare whether you meet this registration standard.

##### During the registration period

Your compliance with this registration standard may be audited from time to time. It may also be checked if the Board receives a notification about you.

##### Evidence

You should retain records as evidence that you meet the requirements of this standard for five years in case you are audited.

## What happens if I don't meet this standard?

If you want to continue to practice, or return to practice after taking a break, and you don't meet this standard, you will need to provide information to help the Board decide whether you are able to continue to practice.

If you don't meet this standard, the Board or its delegate will determine what action you must undertake within a specified time frame:

- a) a period of supervised practice
- b) continuing professional development which may include education courses, and / or
- c) assessment of competence which may include:
  - i. oral examinations, and/or
  - ii. any other examinations or assessments.

To determine these requirement(s), the Board will consider the following information, which must be provided by you:

- a) when you last practised in Australia or New Zealand
- b) your intended and/or previous scope(s) of practice as a pharmacist in Australia, New Zealand and/ or in another jurisdiction
- c) your detailed practice history, and
- d) activities undertaken since you last practised as a pharmacist including any continuing professional development you may have undertaken.

## Other possible consequences

The National Law establishes possible consequences if you don't meet the recency of practice requirements in this standard, including that:

- the Board can impose conditions on your application for registration or renewal of registration or can refuse your application for registration or renewal of registration (sections 82 and 112 of the National Law), and
- registration standards, codes or guidelines may be used in disciplinary proceedings against you as evidence of what constitutes appropriate practice or conduct for pharmacists (section 41 of the National Law).

Knowingly making a false declaration is considered by the Board to be a serious professional conduct matter and may be dealt with by the Board through the disciplinary mechanisms available under the National Law. These mechanisms include the impositions of sanctions ranging from caution or reprimand, to suspension or cancellation of registration. It may also lead to criminal prosecution.

## Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<DATE>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

## More information

The Board may publish guidelines and / or further information to provide explanation about how to meet this standard.

## Definitions

**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 non-clinical 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.

**Recency of practice** means that a health practitioner has maintained an adequate connection with, and recent practice in the profession since qualifying for, or obtaining registration.

**Recent practice** means having practised in one's intended scope of practice in Australia or New Zealand for at least 450 hours within the previous three years, or 150 hours within the previous 12 months.

**Scope of practice** means the professional role and services that an individual health practitioner is educated and competent to perform.

### Review

This standard will be reviewed at least every five years.

Last reviewed: <<date>>

This standard replaces the previously published registration standard from <<date>>.

## Overview

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28 April 2014

### Review of the *Registration standard: Supervised practice arrangements*

#### Summary of issue

83. The National Law outlines that the Board may also develop, and recommend to the Ministerial Council, one or more registration standards about an issue relevant to the eligibility of individuals for registration in the profession or the suitability of individuals to competently and safely practise the profession.
84. Section 52(1)(b)(i) of the National Law outlines that an individual is eligible for general registration in the pharmacy profession if they have successfully completed any period of supervised practice in pharmacy required by an approved registration standard.
85. The Board's current Supervised practice arrangements registration standard outlines:
  - the requirements for supervised practice including the period of supervised practice to be undertaken for general registration for graduates of approved programs of study and overseas trained pharmacists
  - the conditions under which supervised practice must be undertaken, and
  - the requirements for preceptor pharmacists to be approved by the Board including the requirement for them to have attended within the previous three years preceptor training approved through the accreditation process approved by the Board.
86. The Board is reviewing this standard to ensure it meets the objectives of the National Law and is worded as simply and clearly as possible. It is specifically addressing the requirement of accredited training for preceptors in the current standard.

#### Options statement

87. The Board has considered a number of options in developing this proposal.

##### Option 1 – Status quo

88. Option 1 would continue with the existing registration standard. The registration standard establishes the Board's requirements for supervised practice. The Board has identified a range of minor issues with the current standard, including:
  - the ability to clarify the language and structure to make it easier to understand, and
  - the need to further consider the potential impact on the delivery of supervised practice of the proposed preceptor training accreditation process which was not implemented by 1 July 2013.

##### Option 2 – Proposed revised standard

89. Option 2 would involve the Board submitting a revised registration standard to the Ministerial Council for approval. The registration standard would continue to establish the Board's requirements for supervised practice and has clearer wording and structure to make it easier to understand.
90. The revised standard includes additional requirements for supervised practice when undertaken concurrently across multiple training sites, to facilitate achievement of suitable training outcomes. The revised standard does not include a requirement for preceptors to have undertaken accredited training, and instead provides alternative options for supervising pharmacists to prepare for their roles as preceptors. The Board amended this aspect of the registration standard taking into consideration feedback received during a forum on preceptor training options which was attended by major pharmacy stakeholders in February 2013.
91. Definitions for the following terms have also been added to the revised standard:
  - supervising pharmacist
  - internship



- intern, and
- approved pharmacy program.

92. The review period of the standard has been changed from three to five years, with an earlier review if the need arises.

### **Preferred option**

93. The Board prefers Option 2.

### **Issues for discussion**

#### **Potential benefits and costs of the proposal**

94. The benefits of the preferred option are that the draft revised standard:

- addresses the following issues with the current standard:
  - it did not provide clear guidance on appropriate supervised practice arrangements to facilitate the achievement of suitable training outcomes when supervised practice is undertaken concurrently across multiple training sites
  - there were potential barriers to training if preceptors were required to undertake accredited preceptor training when there is currently no accreditation process approved by the Board
- is flexible and user-friendly
- strikes a balance between protecting the public and impact on applicants
- has been reworded to be simpler and clearer.

95. The costs of the preferred option are:

- applicants, other stakeholders, AHPRA and National Boards will need to become familiar with the new standard
- there will likely need to be a period of transition to the proposed revised standard, if approved.

#### **Estimated impacts of the draft revised registration standard**

96. The change in the proposal to introduce mandatory accredited preceptor training for pharmacists in the draft revised standard is not anticipated to have significant impacts on stakeholders. Although stakeholders may have expected this requirement to commence on 1 July 2013 as stated in the current standard, they were advised by the Board that it would consult on this requirement prior to its introduction. Alternative options for pharmacists to prepare for their role as preceptor is provided in the draft revised standard and will be further detailed in supporting documents for preceptors (preceptor guide).

97. Other changes proposed in the draft revised standard are relatively minor, although more significant changes may be proposed through consultation. There is little impact anticipated on practitioners, business and other stakeholders.

### **Relevant sections of the National Law**

98. Relevant sections of the National Law relating to supervised practice (and summarised above) are:

- Section 38, and
- Section 52.

### **Questions for consideration**

99. The Board is inviting feedback on the following questions.

- From your perspective, how is the current registration standard working?
- Is the content and structure of the draft revised standard helpful, clear, relevant and more workable than the current standard?
- Is there any content that needs to be changed or deleted in the draft revised standard?
- Is there anything missing that needs to be added to the draft revised standard?

- Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?
- Do you have any other comments on the draft revised standard?

100. The proposed revised Registration standard: Supervised practice arrangements is on page 34 of this consultation paper.

101. The Board's Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation is at [Attachment 1](#).

#### **Attachments**

102. The current Supervised practice arrangements registration standard is published on the Board's website, accessible from [www.pharmacyboard.gov.au/Registration-Standards.aspx](http://www.pharmacyboard.gov.au/Registration-Standards.aspx).

## Pharmacy Board of Australia

### Registration standard: Supervised practice arrangements (Draft)

**Effective from:** <<date>>

**Review date:** <<date>>

This registration standard sets out the Board's minimum requirements for supervised practice for pharmacy interns and pharmacists. Supervised practice, which includes internship, is practising under the direct supervision of a pharmacist who holds general registration (a preceptor or other supervising pharmacist) while pharmacy services are provided in pharmacy premises or in other circumstances determined by the Board.

#### Does this standard apply to me?

This registration standard applies to:

- individuals who hold provisional or limited registration to complete the eligibility requirements for general registration under the Health Practitioner Regulation National Law, as in force in each state and territory (National Law)
- individuals who are required to complete a period of supervised practice in accordance with the requirements specified in the Board's *Recency of practice registration standard*, and
- pharmacists who are approved as preceptors.

#### What must I do?

To be eligible for general registration, you must complete a period of supervised practice as specified in section 52(1)(b)(i) of the National Law.

1. The requirements for supervised practice are as follows.
  - a) If you are a graduate of an approved pharmacy program, the period of supervised practice to be undertaken for general registration is 1,824 hours and must include satisfactory completion of an accredited intern training program
  - b) If you are an overseas qualified pharmacist from a country other than New Zealand, and:
    - your qualification has been assessed by the Board's accreditation authority as acceptable to undertake a knowledge assessment conducted by the accreditation authority, and
    - you have been assessed by the accreditation authority as having knowledge comparable to a graduate of an approved pharmacy program,the period of supervised practice is 1,824 hours, or a lesser period to be determined by the Board or its delegate, in accordance with the Board's guidelines or policies. The supervised practice is to include satisfactory completion of an accredited intern training program, unless the Board has given an exemption to this requirement.
  - c) If you are required to complete a period of supervised practice in accordance with the requirements specified in the Board's recency of practice standard, any period of supervised practice will be determined by the Board or its delegate.
2. Supervised practice must be undertaken in accordance with the following requirements:
  - a) you must hold current Board registration which enables you to practise under supervision before commencing, and at all times whilst undertaking, supervised practice
  - b) in order to provide satisfactory learning opportunities, each period of supervised practice you undertake under the direction and/or supervision of an individual preceptor approved by the Board, must be a total minimum duration of 152 hours
  - c) the supervised practice you undertake must be under the direct supervision of a pharmacist who holds general registration (the supervising pharmacist, who is not necessarily the approved preceptor)

- d) to ensure supervised practice hours are undertaken regularly and consistently, you must undertake a minimum of 80 hours in a period of four consecutive weeks, unless otherwise approved by the Board
  - e) in meeting clause 2 d) above, if supervised practice is undertaken concurrently across multiple training sites, the training must be coordinated by a preceptor who must be nominated as the coordinating preceptor for approval by the Board or its delegate
  - f) to discourage excessive working hours, you may count a maximum of 180 hours in a period of four consecutive weeks, as supervised practice hours
  - g) if the circumstances outlined in 1 a) or 1 b) apply to you, at least 50 per cent of the required supervised practice hours must be undertaken in a community pharmacy or a hospital pharmacy department, unless otherwise approved by the Board
  - h) you may only undertake supervised practice hours in premises where the total number of interns does not exceed the total number of supervising pharmacists at any time
  - i) for each period of supervised practice you undertake, the number of hours, preceptor and premises for the supervised practice must be specified in an application to be approved by the Board or its delegate prior to commencement, and
  - j) you may only undertake supervised practice hours from the date of approval of supervised practice by the Board or its delegate, or from the date you were granted registration in order to complete a period of supervised practice, whichever is later.
3. It is the responsibility of the person undertaking supervised practice to ensure that prior to commencement of supervised practice, they have:
- a) been granted Board registration in order to complete a period of supervised practice, and
  - b) gained Board approval for the period of supervised practice to be undertaken.
4. To be approved as a preceptor by the Board or its delegate, you must:
- a) hold general registration as a pharmacist
  - b) have held general registration and practised as a pharmacist for a minimum of 12 months in the area of practice where the supervised practice is to be conducted (unless you have been registered for a shorter period and are approved by the Board to act as preceptor)
  - c) be practising in pharmacy premises, or in other locations suitable for conducting supervised practice as determined by the Board
  - d) not have conditions placed on your general registration that would impact on your ability to conduct the supervised practice of the individual, and
  - e) have suitable relevant training or experience.

*(Note: Preceptors are referred to the Board's published guidance for preceptors, which outlines the Board's expectations of preceptors conducting supervised practice, including their responsibilities and how they should prepare adequately for their role).*

### Are there exemptions to this standard?

Individuals undertaking the Stream B Australian Pharmacy Council (APC) process for overseas trained pharmacists are not required to undertake an accredited intern training program outlined under requirement 1 b).

### Guidelines and explanatory notes

The Board's preceptor and intern pharmacist guides provide explanation about how to meet this standard. Preceptors and individuals undertaking supervised practice are expected to apply the guide relevant to their role in supervised practice together with this registration standard.

This standard should be read in conjunction with the Board's *Registration standard: Recency of practice*.

### What does this mean for me?

#### Prior to commencing supervised practice

You will be required to apply to the Board for registration which enables you to practise under supervision, and to have your period of supervised practice, preceptor and premises approved.

You may commence supervised practice if:

- a. your registration has been granted by the Board (or its delegate),
- b. your supervised practice has been approved by the Board (or its delegate), and
- c. your preceptor has met the Board's requirements for approval.

### When you apply for registration

If you hold, or previously held, provisional or limited registration when you apply for general registration, you are required to provide evidence of successful completion of your supervised practice hours in a format specified by the Board.

### During registration

If you have completed supervised practice as part of the recency of practice requirements set by the Board, you are required to provide evidence of successful completion of your supervised practice hours in a format specified by the Board.

### What happens if I don't meet this standard?

If you do not meet this standard, you do not meet the requirements of section 52(1)(b) of the National Law as in force in each state and territory (National Law) and are ineligible for general registration.

### Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<date>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### Definitions

An approved **preceptor** is a pharmacist responsible for the overall supervision of a pharmacist undertaking supervised practice during a period of supervised practice as part of the process leading to general registration, or during a period of supervised practice in accordance with the requirements specified in the Board's recency of practice standard.

A **supervising pharmacist** is a pharmacist holding general registration who is responsible for the 'day to day' direct supervision of a pharmacist in the provision of pharmacy services during a period of supervised practice approved by the Board. The supervising pharmacist may be the approved preceptor, or another pharmacist who has been delegated this responsibility by the approved preceptor.

**Supervised practice**, which includes internship, is practising under the direct supervision of a pharmacist who holds general registration (the preceptor or another supervising pharmacist), while pharmacy services are provided in pharmacy premises or in other circumstances determined by the Board.

**Internship** is the period during which a pharmacist undertakes a period of supervised practice under the supervision of a preceptor, in order to meet the requirements for initial general registration in Australia.

A pharmacy **intern** is a person registered with the Board who has completed the educational requirements determined by the Board to enable them to undertake a period of supervised practice required for initial general registration in Australia pursuant to clause 52(1)(b)(i) of the National Law.

An accredited **intern training program** is a program of work integrated learning conducted by intern training providers and accredited by the accreditation authority and approved by the Board.

An **approved pharmacy program** is a program of study approved by the Board under section 49 of the National Law.

## References

Pharmacy Board of Australia Registration standard: Recency of practice

## Review

This standard will be reviewed at least every five years.

Last reviewed: <<date>>

This standard replaces the previously published registration standard from <<date>>.

## Overview

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28 April 2014

### Review of the *Registration standard: Examinations for eligibility for general registration*

#### Summary of issue

103. The National Law outlines that the Board may also develop, and recommend to the Ministerial Council, one or more registration standards about an issue relevant to the eligibility of individuals for registration in the profession, or the suitability of individuals to competently and safely practise the profession.
104. Section 52(1)(b)(ii) of the National Law outlines that an individual is eligible for general registration in the pharmacy profession if they have successfully completed any examination or assessment required by an approved registration standard to assess the individual's ability to competently and safely practise pharmacy.
105. The Board's current Examinations for general registration standard outlines the requirements for successful completion of a registration examination conducted on behalf of the Board for individuals applying for initial registration.
106. The Board is reviewing this standard to ensure it meets the objectives of the National Law and is worded as simply and clearly as possible.

#### Options statement

107. The Board has considered a number of options in developing this proposal.

#### Option 1 – Status quo

108. Option 1 would continue with the existing registration standard. The registration standard establishes the Board's requirements regarding undertaking examinations for eligibility for general registration. The Board has identified a range of minor issues with the current standard, including the ability to clarify the language and structure to make it easier to understand.

#### Option 2 – Proposed revised standard

109. Option 2 would involve the Board submitting a revised registration standard to the Ministerial Council for approval. The registration standard would continue to establish the Board's requirements for examinations for eligibility for general registration, with minor changes such as:
- specification of the examination(s) to be undertaken by provisional and limited registrants
  - inclusion of a definition for each of the different examinations
  - inclusion of a reference to the Oral Examination Candidate Guide published by the Board which provides further information about the oral examination structure and process
  - inclusion of a reference to the Australian Pharmacy Council who conducts the written examination on behalf of the Board, and publishes information regarding this examination on its website.
110. The review period of the standard has been changed from three to five years, with an earlier review if the need arises. The revised standard has clearer wording and structure to make it easier to understand.

#### Preferred option

111. The Board prefers Option 2.

## Issues for discussion

### Potential benefits and costs of the proposal

112. The benefits of the preferred option are that the draft revised standard:

- is flexible and user-friendly
- strikes a balance between protecting the public and impact on applicants
- has been reworded to be simpler and clearer.

113. The costs of the preferred option are:

- applicants, other stakeholders, AHPRA and National Boards will need to become familiar with the revised wording and structure in the new standard.

### Estimated impacts of the draft revised registration standard

114. The changes proposed in the draft revised registration standard are relatively minor, although more significant changes may be proposed through consultation. There is little impact anticipated on practitioners, business and other stakeholders arising from the changes proposed.

## Relevant sections of the National Law

115. Relevant sections of the National Law relating to examinations (and summarised above) are:

- Section 38, and
- Section 52.

### Questions for consideration

116. The Board is inviting feedback on the following questions.

- From your perspective, how is the current registration standard working?
- Is the content and structure of the draft revised standard helpful, clear, relevant and more workable than the current standard?
- Is there any content that needs to be changed or deleted in the draft revised standard?
- Is there anything missing that needs to be added to the draft revised standard?
- Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?
- Do you have any other comments on the draft revised standard?

117. The proposed revised Registration standard: Examinations for eligibility for general registration is on page 40 of this consultation paper.

118. The current Examinations for general registration standard is published on the Board's website, accessible from [www.pharmacyboard.gov.au/Registration-Standards.aspx](http://www.pharmacyboard.gov.au/Registration-Standards.aspx)

## Attachments

119. The Board's Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation is at [Attachment 1](#).



## Pharmacy Board of Australia

### Registration standard: Examinations for eligibility for general registration (Draft)

**Effective from:** <<date>>

**Review date:** <<date>>

This registration standard sets out how an individual can meet the examination requirement for eligibility for general registration as required under section 52(1)(b)(ii) of the National Law. To be eligible for general registration, an individual must successfully complete an examination or examinations determined by the Board, to demonstrate their ability to competently and safely practise as a pharmacist. These examinations assess against the competencies outlined in the current *National Competency Standards Framework for Pharmacists in Australia*.

#### Does this standard apply to me?

This registration standard applies to applicants who must meet the eligibility requirements for general registration outlined in section 52 of the National Law and applicants for general registration who have previously met the eligibility requirements for general registration. It does not apply to those individuals entitled to register pursuant to the *Trans-Tasman Mutual Recognition Act 1997*.

#### What must I do?

To be eligible for general registration, you must successfully complete a registration examination conducted by or on behalf of the Board which may consist of:

1. a written examination or examinations, and/or
2. an oral examination or examinations.

An individual holding provisional registration will be required to undertake a written examination conducted by the Australian Pharmacy Council on behalf of the Board, and an oral examination (practice).

An individual holding limited registration will be required to undertake an oral examination (pharmacy law and ethics) or other examination(s) deemed appropriate by the Board to assess their competence to practise.

The examinations will be conducted in accordance with policies published by the Board.

#### Are there exemptions to this standard?

The Board reserves the right to consider and / or grant an exemption to this standard on the basis of applicable Board guidelines or policies, and reserves the right at any time to revoke such an exemption.

#### Guidelines and explanatory notes

The Board's *Oral examination candidate guide* has been published to assist applicants in understanding the eligibility criteria and the rules for conduct of the oral examination for general registration. Information regarding the written examination is published on the website of the Australian Pharmacy Council.

The Board has also published criteria for entry to examinations and issued policies regarding the applicable examinations required for eligibility for general registration which:

- are based on qualifications held by applicants for general registration, and
- specify validity periods for examination results for general registration.

## What does this mean for me?

### Prior to registration

You will be required to lodge an application to undertake a registration examination, entry to which is subject to eligibility criteria contained in policies published by the Board.

### When you apply for registration

When you apply for general registration as a pharmacist, evidence of successful completion of the applicable examination(s) must be available.

## What happens if I don't meet this standard?

If you do not meet this standard, you do not meet the requirement of section 52(1)(b)(ii) of the Health Practitioner Regulation National Law as in force in each state and territory (National Law) and are ineligible for general registration.

## Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<DATE>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

## Definitions

**Eligibility criteria** are rules to indicate when an applicant may be eligible to be granted entry to a written or oral examination.

The **oral examination (pharmacy law and ethics)** is an oral examination delivered by the Australian Health Practitioner Regulation Agency (AHPRA) on behalf of the Board, on pharmacy law and ethics.

The **oral examination (practice)** is a national oral examination delivered by the Australian Health Practitioner Regulation Agency (AHPRA) on behalf of the Board, on pharmacy practice.

The **written examination** is a multiple choice examination on pharmaceutical calculations, pharmacy law and ethics, and pharmacy practice. It is conducted by the Australian Pharmacy Council on behalf of the Board.

## More information

Pharmacy Board of Australia Registration examination policy (currently under development)

Pharmacy Board of Australia Oral examination candidate guide

National Competency Standards Framework for Pharmacists in Australia

Australian Pharmacy Council (APC) website

## Review

This standard will be reviewed at least every five years.

Last reviewed: <<date>>

This standard replaces the previously published registration standard from <<date>>.

Board's statement of assessment against AHPRA's *Procedures for development of registration standards* and COAG principles for best practice regulation

*Registration standard: Professional indemnity insurance arrangements*

*Registration standard: Continuing professional development*

*Registration standard: Recency of practice*

*Registration standard: Supervised practice arrangements*

*Registration standard: Examinations for eligibility for general registration*

The Australian Health Practitioner Regulation Agency (AHPRA) has *Procedures for the Development of Registration Standards* which are available at: [www.ahpra.gov.au](http://www.ahpra.gov.au)

These procedures have been developed by AHPRA in accordance with section 25 of the *Health Practitioner Regulation National Law* as in force in each state and territory (the National Law) which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme operates in accordance with good regulatory practice.

Below is the National Boards' assessment of their proposal for its draft revised registration standards against the three elements outlined in the AHPRA procedures.

### 1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law

#### Board assessment

The Board considers that the revised draft registration standards meet the objectives and guiding principles of the National Law.

The revised draft *Registration standard: Professional indemnity insurance arrangements*, if approved, will provide for the protection of the public by ensuring that practitioners have appropriate professional indemnity insurance arrangements in place when they practise.

The revised draft *Registration standard: Continuing professional development*, if approved, will provide for the protection of the public by ensuring that practitioners undertake appropriate continuing professional development as an important aspect of maintaining their competence.

The revised draft *Registration standard: Recency of practice*, if approved, will provide for the protection of the public by ensuring that practitioners have appropriate recent practice.

The revised draft *Registration standard: Supervised practice arrangements* if approved will provide for protection of the public by setting out the minimum supervised practice requirements for general registration including requirements for the conduct of supervised practice by approved preceptors.

The revised draft *Registration standard: Examinations for eligibility for general registration* if approved will provide for protection of the public by setting out the examinations applicants for general registration must pass to demonstrate their ability to competently and safely practise as a pharmacist.

The revised draft registration standards also support the National Scheme to operate in a transparent, accountable, efficient, effective and fair way.

## 2. The consultation requirements of the National Law are met

### Board assessment

The National Law requires wide-ranging consultation on proposed registration standards. The National Law also requires the Board to consult other boards on matters of shared interest.

The Board will ensure that there is public exposure of its proposals and there is the opportunity for public comment by undertaking an eight week public consultation process. This process includes the publication of the consultation paper (and attachments) on its website.

The Board has drawn this paper to the attention of key stakeholders.

The Board will take into account the feedback it receives when finalising its proposals for submission to the Ministerial Council for approval.

## 3. The proposal takes into account the COAG Principles for Best Practice Regulation

### Board assessment

In developing the revised draft registration standards for consultation, the Board has taken into account the Council of Australian Governments (COAG) *Principles for Best Practice Regulation*.

As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community.

The Board makes the following assessment specific to each of the COAG principles expressed in the AHPRA procedures.

## COAG Principles

### A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

#### Board assessment

The Board considers that its proposals are the best options for achieving the stated purposes. As only minor changes to the existing standards are proposed, the impact of the proposals is similar to the existing registration standards.

The Board considers that the revised draft standards would have a low impact on the professions. These low impacts are significantly outweighed by the benefits of protecting the public and providing clearer, simpler requirements, in the public interest.

National Boards in reviewing their registration standards commissioned a review of the literature on the effectiveness of CPD and on recency of practice requirements. The Board has taken this information and its regulatory experience into account in its review of the *Registration standard: Continuing professional development* and *Registration standard: Recency of practice*. The Board also conducted a forum with pharmacy stakeholders to discuss options for pharmacists to adequately prepare for their roles as preceptors in the conduct of supervised practice of interns as part of its review of its *Registration standard: Supervise practice arrangements*.

### B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

#### Board assessment

The Board considered whether its proposals could result in an unnecessary restriction of competition among health practitioners. The proposals are not expected to impact on the current levels of competition among health practitioners.

### **C. Whether the proposal results in an unnecessary restriction of consumer choice**

#### **Board assessment**

The Board considers that the revised draft *Registration standard: Professional indemnity arrangements* will support consumer choice, by establishing clear requirements for professional indemnity insurance arrangements that practitioners must meet when they practise, in accordance with the National Law.

The Board considers that the revised draft *Registration standard: Continuing professional development* will support consumer choice, by establishing clear requirements for continuing professional development that practitioners must meet as a key part of maintaining their competence, in accordance with the National Law.

The Board considers that the revised draft *Registration standard: Recency of practice* will support consumer choice, by establishing clear requirements for recency of practice that practitioners must meet, in accordance with the National Law.

The Board considers that the revised draft *Registration standard: Supervised practice arrangements* will support consumer choice, by establishing clear requirements and options for the conduct of supervised practice to facilitate the achievement of satisfactory training outcomes as part of achieving competence to practise.

The Board considers that the revised draft *Registration standard: Examinations for eligibility for general registration* does not result in an unnecessary restriction of consumer choice as it sets out the examinations that the Board conducts to assess competence of an individual to competently and safely practise as a pharmacist.

### **D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved**

#### **Board assessment**

The Board considered the overall costs of the revised registration standards to members of the public, registrants and governments and concluded that the likely costs are appropriate when offset against the benefits that the revised draft standards contribute to the National Scheme.

Subject to stakeholder feedback on the proposed revisions and if approved by the Ministerial Council, the revised draft standards should have only minimal impact on the costs to applicants by presenting the Board's requirements in a clearer and simpler way.

### **E. Whether the requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants**

#### **Board assessment**

The Board considers that the revised draft registration standards have been written in plain English that will help practitioners to understand the requirements of the standard. The Board has changed the structure of the standards and reviewed the wording to make the standards easier to understand.

### **F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time**

#### **Board assessment**

If approved, the Board will review the revised registration standards at least every five years, including an assessment against the objectives and guiding principles in the proposed National Law and the COAG principles for best practice regulation.

However, the Board may choose to review the standards earlier, if it is necessary to ensure the standards' continued relevance and workability.