

Health Workforce Principal Committee

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Mr Joe Brizzi
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Dear Mr Brizzi

Pharmacy Board of Australia's Targeted Consultation Paper: Responsibilities of pharmacists when practising as proprietors

Thank you for providing the Health Workforce Principal Committee (HWPC) with the opportunity to comment on the *Guideline on the Responsibilities of pharmacists when practising as proprietors*.

All views expressed in this letter are subject to alteration by Health Ministers and must not be assumed to represent the views of Health Ministers

The HWPC supports the development of the Guideline as a means of ensuring that pharmacy services are of a high professional standard and recognises that the draft guideline has been developed to provide guidance to registered pharmacists or those seeking to become registered pharmacists in Australia, under Part 5, Division 3, 39 and 40 of the Health Practitioner Regulation National Law Act 2009.

The HWPC supports the principles espoused in the Guideline. An additional matter that might be considered for inclusion is the possible broadening of the scope to make it clear that the Guideline covers all models of pharmacy ownership, i.e. not only individual proprietor pharmacists, but also pharmacists who hold a position of authority in a corporate pharmacy services provider or who act as a pharmacy services provider as a trustee of a trust, and

Some general comments which the HWPC would like to convey to the Pharmacy Board of Australia regarding the Guideline include:

- Compliance with the legislation is part of the overall 'practice of pharmacy' and it is good that there is concordance between the Guideline and the message given to pharmacist licence holders by jurisdictions.
- Recognition that problems encountered in pharmacies are often related to system failure rather than solely the actions of an individual.
- The guidelines should be reviewed at regular intervals to ensure they reflect changes in practice and remain current and appropriate

Please contact JulieAnne Anderson, HWPC Secretariat, if you require further information.

Yours sincerely



Tony Sherbon
Chair, Health Workforce Principal Committee

2 November 2010