



Electronic Submission
Attention Practitioner Regulation Subcommittee
NRAIP@dhs.vic.gov.au

Re: National Registration and Accreditation Scheme for the Health Professions

I refer to the letter of 13 August 2008 from the Health Workforce Principal Committee inviting submissions from “all boards in the ten professions across Australia” for the consideration of Health Ministers consistent with the provisions of the IGA.

After considering the two questions in the letter this Council, which is the authority which registers pharmacists in Western Australia, recommends the following:

1. There is differing supplementary and varied criminal and professional legislation in each state and territory, as well as a lack of nationally consistent drugs and poisons legislation. Therefore the national board for pharmacy should have eight (8) pharmacists, one from each jurisdiction, and four (4) community members. In keeping with the terms of the IGA, the pharmacy members would not be representatives of the jurisdictions, but work with a national perspective and local knowledge.

It is suggested that the legislation remains silent on descriptors for the pharmacist members, but that the process should be open and merits based, and that selection criteria should recommend that members have *inter alia* a mix of the following attributes:

- pharmacy educational experience;
- recent experience in hospital pharmacy practice
- recent experience in community pharmacy practice;
- governance, regulatory/legal/competency development and assessment experience.

The mechanism to appoint the Chair should be included in the legislation and should be by a recommendation from the Board to the Ministers.

Further, the Council strongly recommends that the periods of appointment of members be for three years and that they be staggered to prevent loss of corporate knowledge and experience.

2. This Council recommends that the Australian Pharmacy Council be assigned to continue the accreditation function on behalf of the pharmacy profession and the public.

Thank you for the opportunity to comment.

Yours Sincerely

R J Brennan
Registrar
10 September 2008