



9 September 2008

Ms Bronwyn Nardi
Chair, Practitioner Regulation Subcommittee
Health Workforce Principal Committee
By email: NRAIP@dhs.vic.gov.au

Dear Ms Nardi

Re: Consultation paper on issues supplementary to the Intergovernmental Agreement on a National Registration and Accreditation Scheme for the health professions to be included in the first bill

The Pharmacy Board of Victoria ("the PBV") is pleased to respond to your invitation to comment on matters other than those covered by the COAG Intergovernmental Agreement (IGA) which are to be included in the first Bill on the new scheme.

Appointments

The PBV recommends that the appointment period be for a maximum term of three years thereby permitting staggered appointment dates so that there is not a significant loss of knowledge and experience at the conclusion of a term. This procedure is contained in the Health Professions Registration Act 2005 which on commencement had members appointed for either two or three year terms and has been successful.

Given that nationally consistent drugs and poisons legislation does not exist, an appropriate, wide level of experience and knowledge would assist the national board of pharmacy in its initial term. It is therefore recommended that consistent with the IGA in terms of achieving a national perspective with local knowledge the initial board should have eight pharmacists with one appointed from each jurisdiction and four community members.

Appointment should be merit based and selection criteria should include a mix of the following attributes:

- Experience in pharmacy education;
- Recent hospital pharmacy practice;
- Recent community pharmacy practice; and
- Governance, regulatory, legal, and competency development and assessment experience.

The appointment of the Chair should be included in legislation and be by a recommendation from the board to the Ministers.

5.11 Responsibility for developing accreditation standards (accreditation committee or bodies)

The PBV submits that the national boards should have responsibility for ensuring the development of accreditation standards as provided in the IGA rather than the Ministerial Council. The PBV further submits that the Australian Pharmacy Council be assigned to continue the accreditation function on behalf of the pharmacy profession in the public interest.

Yours sincerely

Stephen Marty
Registrar