



ACT Pharmacy Board

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17 October 2008

“Registration Arrangements Submission”
Attention: Practitioner Regulation Subcommittee

nraip@dhs.vic.gov.au

NATIONAL REGISTRATION AND ACCREDITATION SCHEME FOR THE HEALTH PROFESSIONALS

CONSULTATION PAPER PROPOSED REGISTRATION ARRANGEMENTS

The ACT Pharmacy Board supports the majority of the Consultation Paper on Proposed Registration Arrangements but would like to offer the following comments on:

4.3 Criminal history checks

ACT prefers option 4 as this works for ACT at present. Let's not make processing applications harder than necessary. It is an employer's responsibility to check his staff.

7.5 Corporate registration

This is an important issue in the ACT as we do register corporations as pharmacists (providing that all directors are pharmacists and all shareholders are pharmacists or family members without voting rights, et al). In the ACT, only a pharmacist may own a pharmacy and there are corporations that own pharmacies in the ACT. If we cease to register corporations we will face a dilemma with the corporations that own pharmacies. The ACT would prefer to continue to register corporations so long as they meet stringent requirements. The ACT does not register friendly societies.

8.1 Protected titles

The ACT would prefer to protect the title "Chemist" when used as a proper noun.

8.2 Practice protection

The ACT would prefer this provision to apply to all regulated health professions (not just dentistry and optometry).

11.3 Failure to renew

The ACT allows two weeks after the due date but a late fee applies. The person is renewed during this fortnight from the due date. If a person fails to renew in this fortnight, then they are removed from the due date. Three months is excessive.

11.4 Reinstatement

The ACT allows reinstatement for one year, after which an initial application is required. Given our recency of practice provisions come in at two years, we could accept two years but prefer one year.

The ACT Pharmacy Board would like to thank you for the invitation to comment on the series of consultation papers.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bill Kelly', with a large, stylized loop at the end.

Bill Kelly
President