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COAG Health Council

By email: admin@asreview.org.au

Submission to NRAS Discussion Paper

The Pharmacy Council of New Zealand (the Council) is pleased to provide this submission to the discussion paper Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professions.

The Council is the New Zealand pharmacy regulator, having legislative responsibility for protecting the health and safety of members of the public who use the services of registered pharmacists. Council’s obligations are outlined in the New Zealand Health Practitioners Competence Assurance Act 2003.

The Council accredits the New Zealand pharmacy education programmes that are prescribed qualifications for registration as a pharmacist. It contracts the Australian Pharmacy Council to undertake evaluations of programmes and providers, and make recommendations on accreditation to the Council.

The Council also undertakes summative assessments of pharmacy interns to provide assurance of readiness for Pharmacist registration. It contracts the Australian Pharmacy Council to deliver the written examination to New Zealand interns.

Retention of a single, pharmacy-focussed accreditation and examination agency provides enduring support for the Trans-Tasman Mutual Recognition Arrangement because standards for education, intern training and Pharmacist registration are either identical or strongly aligned, permitting easy movement between the two countries’ pharmacy workforces.

The Council considers the Australian Pharmacy Council as a valued partner. The contractual and collaborative work of the two Councils ensures the pharmacy profession’s capacity across Australasia remains high and strongly aligned, and that qualifications continue to be appropriate for a workforce that is evolving in both countries to encompass more varied and complex roles in health provision. The New Zealand government recently published its Pharmacy Action Plan which states its expectation that pharmacy must take a greater role in improvement of health outcomes of New Zealanders through strengthened cultural competence, practising at top of scope and providing healthcare in multi-disciplinary teams. The Council relies on excellence in accreditation and assessment to ensure the profession is properly prepared for future challenges. It is therefore important that our accreditation and assessment partner is focused solely on pharmacy and is easily accessible to us. The single-profession focus of the Australian Pharmacy Council has facilitated international benchmarking of its processes and maintenance of important international contacts and learnings. We are not persuaded that these benefits would be realised, or even possible, if Australia adopts a multi-profession accreditation agency.

The Australian Pharmacy Council has deep experience of accreditation and examinations. Subsuming its activity into a multi-profession accreditation organisation would dilute this
experience, to the ultimate cost to the profession. We commend the Australian Pharmacy Council’s recent drives for efficiency without compromising effectiveness or quality of decision-making. It has remained responsive to the needs of its New Zealand partner throughout. Its output-driven, internationally benchmarked processes meet the Council’s requirements for best-practice regulation. The Council has great confidence in the recommendations provided to it by the Australian Pharmacy Council and expresses some disquiet about responsiveness to the New Zealand context and the effect on Trans-Tasman pharmacy profession alignment should a multi-profession accreditation agency be created in Australia.

The Australian Pharmacy Council delivers the Intern Written Examination in New Zealand for the Council. It is responsive to the Council’s requirements for tailoring the examination to New Zealand and is unfailingly efficient and reliable in the examination delivery. The examination arrangement between the two Councils supports the alignment of competence and standards in Australia and New Zealand, and provides efficiencies by way of the economies of scale that are generated by providing the same examination in two countries.

The Trans-Tasman Mutual Recognition Arrangement is upheld and enhanced by the presence of a single pharmacy accreditation and examination agency for both Australia and New Zealand. The effectiveness of the Australian Pharmacy Council has been made possible by its single-profession focus, its responsiveness and accessibility and its ability to take part in, and benefit from, strong international links with the international community of pharmacy accreditation bodies. We would not want to see any dilution of the benefits that have been generated by the current accreditation organisational structures. Further, we consider that the Council’s function as New Zealand regulator would be seriously jeopardised if the Australian Pharmacy Council did not continue as the expert accreditation organisation for pharmacy in Australasia. We anticipate we would be forced to consider other options for these services and that the Council’s current access to accreditation standards for pharmacy undergraduate programmes might be restricted or removed. In the longer term, we believe the assumption of equivalent qualifications on each side of the Tasman that is embodied in the Trans-Tasman Mutual Recognition Arrangement would be questioned.

The Council is grateful for the opportunity to provide this submission. If required, we are happy to expand on these comments or to present on them in person.

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