A submission in response to the Consultation Paper, August 2014, for the Review of the National Registration and Accreditation Scheme for health professions, prepared by Independent Reviewer Mr Kim Snowball commissioned by the Australian Health Ministers’ Advisory Council.

The Australian Pharmacy Council (APC) is pleased to have the opportunity to make a submission in response to the Consultation Paper for the Review of the National Registration and Accreditation Scheme (NRAS) for the health professions.

The APC is a member of the Health Professions Accreditation Councils’ Forum (the Forum) and is a signatory to the Forum response to the review. This submission supplements that of the Forum, and provides specific information and views APC would like to bring to the attention of the review team.

1 About the Australian Pharmacy Council Ltd

The Australian Pharmacy Council is a company limited by guarantee and is an independent accreditation authority appointed by the Pharmacy Board of Australia under the Health Practitioner Regulation National Law Act 2009 (the National Law) as the accreditation authority for the pharmacy profession.

The APC has been operating in various guises for over 30 years; the Australian Pharmacy Examining Council (APEC) formed in 1982 to assess and examine international pharmacists, and the New Zealand and Australian Pharmacy Schools Accreditation Committee (NAPSAC) formed in 1997 to accredit pharmacy programs. The current APC was established in 2006 as an incorporated society, merging both the APEC and NAPSAC, and in 2009 became a company limited by guarantee. Members of the APC include peak Australian pharmacist bodies, the Pharmacy Council of New Zealand and individual pharmacists. Directors of the company (called Councillors) include pharmacists, community representatives and independent directors.

The APC exercises the accreditation functions independently, within the parameters of the National Law and the Quality Framework for Accreditation, the principal reference document for assessment of the work of those authorities. The accreditation functions APC provides include the following:

- **Education and training.** Through developing accreditation standards and assessing programs against those standards, the APC provides the key quality assurance mechanism to ensure that graduates completing accredited and approved programs of study have the knowledge, skills and professional attributes to practise the relevant profession in Australia.

- **Assessment of Overseas trained practitioners.** The APC develops and undertakes processes to assess overseas qualified pharmacists who are seeking registration and work in Australia. This includes both assessments of eligibility for registration and / or migration purposes, as well as examination of these pharmacists both within Australia and around the world. The APC is responsible for the responsiveness and rigorousness of those assessments, and for establishing that individuals have the knowledge, skills and competence to practise in the Australian health care setting.

- **Examination of domestic pharmacy graduates.** The APC has been preparing and delivering national written examinations for Australian pharmacy graduates for nearly a decade. Since the Scheme was initiated, the APC has delivered over 2000 Intern Written examinations by computer-delivery in 9
capital cities of states and territories plus Townsville across Australia annually. Since 2014, the APC has been delivering a national written examination for the Pharmacy Council of New Zealand.

- Quality assurance of programs for continuing professional development.

The Australian Pharmacy Council (APC) has been authorised by the Pharmacy Board of Australia (PBA) to accredit providers of pharmacy CPD activities since the Scheme began. The APC undertakes this role by accrediting organisations which meet strict criteria to accredit CPD activities on APC’s behalf. CPD for pharmacists is an important part of maintaining the skills and responsiveness of the profession and ensuring the continuing quality and safety of pharmacy services for the Australian community.

2 Response to the Consultation Paper

The APC notes the consultation paper identifies several areas as requiring closer scrutiny, including areas relating to the governance and operation of the accreditation functions covered by the Scheme. The APC is committed to contributing to the development of solutions in areas where processes and practices can be improved.

The APC is cognisant of the privileged position that it holds within the Scheme, and of the need to ensure that its processes and procedures are of the highest standard and are delivered efficiently. The APC Mission is “an independent body engaged in the public interest in the development and assurance of education, training and assessment standards”.

The APC “values” underpin the way that we carry out our business and are:
- Independence and high ethical standards
- Accountability to clients and stakeholders
- Honesty and transparency
- Evidence-based decision making and benchmarking
- High quality business processes and outcomes
- Continuous improvement
- Collaborative models of leadership

The APC regards independence as the cornerstone of its governance and decision making. Independence is enshrined in governance from the constitution of the company, the appointment of members and directors and governance policies through to the management of bias and conflict of interest. The APC Council and committee charters outline the roles and responsibilities of office holders, and the codes of conduct clearly articulate the expected high ethical standards of those members.

The APC has a culture of transparency in its operations, and makes policies and procedures openly available to stakeholders and clients. Applicants and candidates are able to access processes and results from the APC website, and APC staff are available by email or phone to answer specific queries. Information for education providers is accessible from the APC website, with expert and approachable staff available to assist in specific instances. The APC is customer-focused and makes every effort to be accountable to its clients and stakeholders.

The APC is assisted in its benchmarking and sharing of best practice in accreditation by strong international relationships, which are cemented in many instances by signed Memorandum of Understanding. APC staff is also regularly invited to contribute at international and national conferences.
Ongoing investment in IT infrastructure is continuing and will assist the APC to further improve its processes and services. Business rules are set at the minimum safe level, and continuously revised to ensure that the standard is appropriate.

The APC works through a consultative and open manner in setting standards and facilitates fora to allow providers to discuss the evidence acceptable for standards and to raise questions of matters of interest in pharmacy education.

Below is a summary of the outputs of the APC activities for 2013/14:

<table>
<thead>
<tr>
<th>Accreditation</th>
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<tbody>
<tr>
<td>We monitored</td>
<td>25</td>
<td>Pharmacy degree programs</td>
</tr>
<tr>
<td>We monitored</td>
<td>8</td>
<td>Intern Training programs</td>
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<tr>
<td>We monitored</td>
<td>4</td>
<td>CPD Accrediting Organisations</td>
</tr>
<tr>
<td>We accredited</td>
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<td>New pharmacy degree program</td>
</tr>
<tr>
<td>We completed</td>
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<td>Accreditation Site Evaluation SET visits of pharmacy degree programs</td>
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<tr>
<td>We completed</td>
<td>3</td>
<td>CPD Accrediting Organisation audits</td>
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<tr>
<td>We resolved</td>
<td>10</td>
<td>Pharmacy degree program conditions</td>
</tr>
<tr>
<td>We resolved</td>
<td>3</td>
<td>Intern Training program conditions</td>
</tr>
<tr>
<td>We implemented</td>
<td>2</td>
<td>New sets of Standards; Degree programs and CPD activities</td>
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<thead>
<tr>
<th>Examinations and Assessments</th>
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</thead>
<tbody>
<tr>
<td>We delivered</td>
<td>2,103</td>
<td>Intern written exams by computer delivery across Australia</td>
</tr>
<tr>
<td>We delivered</td>
<td>44</td>
<td>Exams by computer delivery in New Zealand</td>
</tr>
<tr>
<td>We delivered</td>
<td>259</td>
<td>Exams for internationally trained pharmacists</td>
</tr>
<tr>
<td>We offered</td>
<td>12</td>
<td>Exam sessions in Australia and overseas</td>
</tr>
<tr>
<td>We processed</td>
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<td>Eligibility assessments for pharmacists</td>
</tr>
<tr>
<td>We delivered</td>
<td>3,435</td>
<td>Exam papers for 10 different professions in 20 countries</td>
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</tbody>
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<thead>
<tr>
<th>Stakeholder liaison and relationships</th>
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<th></th>
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</thead>
<tbody>
<tr>
<td>We facilitated</td>
<td>8</td>
<td>Stakeholder workshops for education providers</td>
</tr>
<tr>
<td>We hosted</td>
<td>1</td>
<td>One-day education Colloquium in Melbourne</td>
</tr>
<tr>
<td>We signed</td>
<td>2</td>
<td>Memoranda of Understanding with international colleagues</td>
</tr>
<tr>
<td>We met with</td>
<td>5</td>
<td>International pharmacy sister organisations</td>
</tr>
<tr>
<td>We presented</td>
<td>4</td>
<td>Contributed papers and posters to international conferences</td>
</tr>
<tr>
<td>We published</td>
<td>1</td>
<td>Environmental Snapshot publication on Advanced pharmacy practice</td>
</tr>
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2.1 Relationships and Engagement with Stakeholders

The APC believes a key factor in success of the co-regulatory functions of the Scheme is the ability of the Accreditation authority to engage in a meaningful way with other stakeholders; be they relevant National Boards, their own profession and other professions, education providers, examinations clients or the public.

2.1.1 Engagement with the National Board

The APC has an excellent, collegial and productive relationship with the Pharmacy Board of Australia (PBA, the Board) which allows both parties to achieve their roles within the Scheme. The APC is regularly invited to attend full PBA meetings when matters of accreditation are concerned, and holds regular formal operational meetings with PBA and AHPRA personnel at least twice a year.

The APC has worked hard to achieve this relationship and gain the respect and trust of the Board. This has including developing and providing risk profiles on accredited programs to give the Board the confidence to approve programs that are accredited with conditions. The APC has also assisted the Board in its determinations on pharmacists providing vaccinations, by preparing standards for the accreditation of training courses for pharmacist vaccination courses.

2.1.2 Engagement with the Pharmacy Profession

The APC is actively involved in discussions across the pharmacy profession in the area of education and accreditation. The APC also hosts the secretariat for the Australian Pharmacy Liaison Forum, a forum for the Presidents and Executives of each of the peak National pharmacy bodies.

As testament to the confidence that the profession has in the APC, the APC has been granted the role of independent credentialing body for Advanced Practice Pharmacists in Australia. The work of Advanced Practice credentialing has never before been undertaken in Australian pharmacy and the enthusiasm of the profession regarding the development of this new recognition pathway is tangible. To support this new process, the APC has created a new Advanced Practice Credentialing Committee (APCC) which includes seven members from within pharmacy, both in Australia and internationally, a medical education member and a community member.

2.1.3 Engagement with other health professions

The APC works collaboratively within the Health Professions Accreditation Councils’ Forum and assists with projects of mutual interest. This includes leadership in the annual Accreditation workshops held by the Forum and leading projects on mutual standards such as prescribing standards. The APC staff is regularly called upon to provide guidance to smaller and less mature Accreditation Councils, and offer this assistance regularly. APC also delivers international and domestic examinations on behalf of two other members of the NRAS Scheme, the Australian Physiotherapy Council and the Australian Dental Council.

The APC is also working with other professions in delivering of services; an example of this is the skills assessment services for the Chiropractic Council on Education Assessment, Australia. This contract commenced on 1 August 2014 and leverages off APC staff and infrastructure.
2.1.4 Engagement with Education Providers

The APC Accreditation team is focussed on furthering the understanding of quality assurance requirements for pharmacy education programs. In late 2013 the APC held five road shows across Australia and New Zealand to engage education providers in discussion on the new requirements of the new outcomes-focused evidence-based Accreditation Standards for Degree Programs. The roadshows also provided an opportunity for members of the academic programs and the APC to discuss quality assurance. Following these roadshows, the APC published an evidence guide to complement the standards.

The roadshows are one component of the engagement strategy of the APC in the education area. In July 2013 the APC held an inaugural Colloquium in Melbourne with the topic “Accreditation: Drivers to Innovation and Change”. Over 60 people attended, and heard from a variety of speakers including a guest speaker from the University of East Anglia who spoke on the experience of assessment against revised Accreditation Standards and outcomes-focused accreditation in the United Kingdom. The Colloquium highlighted a need for an open forum between education providers and the profession to discuss topics related to pharmacy education and practice. The feedback was very positive and the second Colloquium was held in August 2014, with a guest speaker from Canada speaking on “The mysteries of time and space: Preparing pharmacists for patient-centred care”. Over 100 people attended this day in Brisbane and over 50 joined on a live webcast. This webcast link is available for viewing on the APC website at www.pharmacycouncil.org.au.

The APC also hosts regular workshops with Intern Training Providers and Continuing Professional Development providers, to assist their interpretation and understanding of the accreditation standards.

The APC Accreditation team is actively involved in national and international pharmacy education forum; the APC staff have had papers, posters and workshops accepted at conferences in the US, Australia and New Zealand as well as invitations to present work of the APC at the International Pharmacists Federation congress.

The APC regularly gathers feedback from education providers after Site Evaluation Team visits or audits. This feedback is used by the APC to improve processes. An example of this is the APC agreement to add a second academic member to the SET team, as requested by universities, which commenced in 2013.

2.1.5 Engagement with Examinations and Assessments stakeholders and clients

The Examinations and Assessments team regularly engages with key stakeholders as part of its ongoing commitment to continuous improvement.

The APC conducts a survey of interns on an annual basis and uses feedback from interns to inform process and operational changes. For instance, after the 2013 intern survey that identified the need for more resources to support intern preparation for the examination, the APC began releasing practice papers and developed an interactive e-learning suite of modules that comprehensively covers all aspects of the Intern Written Examination. An example of some of the questions and feedback received is as below:
Further feedback from this survey has resulted in operational improvements and changes to ‘on-the-day’ experiences for interns.

The APC also conducts a survey of the overseas-trained pharmacists that have applied for a skills assessment. This survey, which is conducted every 3 to 5 years, is used to refine resource materials, changes to the website and improve the application processes. The next overseas survey is due to be conducted in 2015.

Incorporated into the regular workshops and surveys is a program of on-site observations at examination sessions. These observations provide real-time, coal-face information and opportunities for APC stakeholders to engage with APC staff and discuss issues, concerns and opportunities. A rigorous observation reporting system ensures that feedback from these visits is incorporated into regular quality assurance and improvement strategies.

Due to the number and scope of its examinations, the APC holds regular item (question) review, writing and validation workshops across the country with pharmacists from all practice areas and environments. These workshops, which not only assist the APC in keeping its examinations valid and relevant, are a vital feedback and stakeholder engagement mechanism that allow the APC to access valuable opinions and comments from registered pharmacists on a wide-range of topics. A number of these workshop participants have now been included in several new operational groups formed by the APC to focus on various aspects of APC examination processes.

As part of its business model, the APC regularly meets with its key service providers, international partners, contractors and various Government departments including the Department of Immigration and Border Protection, the Department of Education, the Pharmacy Council of New Zealand, various NRAS accreditation councils for whom the APC delivers examinations, and Pearson VUE.

2.1.6 Engagement with the public

The APC has two community members on both its Council and its committees and values their contribution. Feedback to APC consultations is actively encouraged by community organisations, and the responses are taken into consideration in modifications to standards and processes.

2.2 Responses to specific Consultation Questions

The APC view and responses to some questions in the consultation paper that specifically relate to accreditation functions are given below. These augment the response from the Health Professions Accreditation Councils’ Forum.

**Question 20: To what extent are National Boards and Accrediting Authorities meeting the statutory objectives and guiding principles of the National Law, particularly with respect to facilitating access to services, the development of a flexible, responsive and sustainable health workforce, and innovation in education and service delivery?**
The APC contributes to meeting the statutory requirements and guiding principles of the National Law by setting Standards for education and training that are contemporary, robust, benchmarked nationally and internationally, and are responsive to the needs of the community.

The APC is committed to the development of a flexible, responsive and sustainable health workforce, and innovation in education and service delivery, and this is evidenced in a number of ways.

In 2012 the APC began a process to review the Standards for degree programs after a request from the Pharmacy Board of Australia. As the APC is well-connected and aware of the contemporary issues of key stakeholders, educational developments, developments in pharmacy practice and the needs of the public, Government, and employers, the APC was able to deliver these new standards ready for implementation in 2014.

The APC Standards are “evidence-based and outcome-focused”; that is, they are not unnecessarily prescriptive and put the onus onto the education provider to provide evidence of achievement of the outcome. These types of standards enable and facilitate diversity of approaches and innovation by education providers and drive and enable responsive practice and innovation. They do not “prescribe” hours or methods of clinical placements, and therefore enable education providers to innovate with interprofessional education, experiential placements and simulated learning environments.

To assist education providers to transition to the new standards, the APC held a series of roadshows around Australia and New Zealand prior to implementation (see Engagement). The new Standards address areas of cultural awareness of Aboriginal and Torres Strait Islander peoples. The APC is holding a workshop with education providers in October 2014 to facilitate discussion amongst education providers on the evidence they can provide to meet these new standards.

An example of innovation in education and service delivery is the changes to accreditation standards to support the use of simulated learning platforms, which enables students to develop core skills before they use them in a clinical setting or professional practice.

An example of improved access to services through accreditation is the University of New England Bachelor of Pharmacy program which is delivered in a blended learning modality with online learning and face-to-face residential school. The APC accredited this program which allows some students to learn from remote and regional locations and to undertake their experiential placements in their local communities. This enables remote communities to train and retain skilled practitioners and maintain services in their communities.

Question 22: To what extent are Accrediting Authorities accommodating multidisciplinary education and training environments with coordinated accreditation processes or considering future health practitioner skills and competencies to address changes in technology, models of care and changing health needs?

Accreditation Authorities are only one part of the mix with respect to driving innovation within a profession; National Boards, professional bodies and practitioners also have influence. As outlined above, the APC consults widely with stakeholders on Standards, and are responsive to their feedback.

The APC, through its networks and engagements with stakeholders, is fully aware of the changes in health care models for pharmacy. The APC is a leader within the pharmacy profession and engages the profession.
in discussions on these issues. As mentioned previously, the APC recently held a pharmacy education forum entitled “The mysteries of time and space: Preparing pharmacists for patient-centred care” where attendees discussed the education needed to encourage this change. The APC funded the travel and accommodation for ten student and early career pharmacists to attend this event.

The APC is also member of the Pharmacy Practice Development Committee, a profession-wide group responsible for the development of competency standards for pharmacists, and most recently this group assisted the Pharmacy Board of Australia to determine the competencies for pharmacists to become vaccinators. The APC has now prepared standards for the accreditation of courses which train pharmacists to administer vaccines. The next work will be the preparation of standards for pharmacist prescribers.

The APC evidence-based and outcome-focused Standards assist to encourage innovation in inter-professional education as they require that graduates are equipped for patient-centred care as part of multidisciplinary teams. However, some education providers’ perceptions of what constitutes inter-professional education, and what can be seen as a solution to implementing inter-professional education, does not always align with what the profession expects. The APC is not convinced of the validity of some of the approaches taken, with an example being the introduction of common health first year programs, in which students are placed together in large learning environments before they are professionalised within their own future professions.

Question 24: How effective are the current processes with respect to the assessment and accreditation of overseas trained practitioners?

The APC has been responsible for the assessment and examination of overseas trained pharmacists since 1982, when the original Australian Pharmacy Examining Council was formed. Over this time, APC has reviewed and refined its processes to meet Australian needs and, when and where appropriate, align with international standards.

Australia has a significant reliance on overseas trained practitioners, particularly in rural areas, and the APC devotes considerable effort to ensuring the assessment processes are appropriately benchmarked to the standard of locally-trained practitioners to enable the provision of a healthcare workforce that meets the requirements of the Australian public.

In 2012 the APC set Accreditation standards for assessing authorities in other countries and assessed the standards of training and practice of the UK, Canada, Ireland and the USA against these standards. This has allowed the APC to provide streamlined assessment pathways for applicants from these jurisdictions where the standard of training is considered to be comparable with Australia, and has reduced the barriers for entry for practitioners from these countries. The APC carries out skills assessments and written examinations to determine eligibility for pharmacists for other jurisdictions to apply for provisional registration with the Board. These rigorous assessment processes reflect the significant variation in training and outcomes associated with pharmacist education occurs across (and within) international jurisdictions.

The APC assists a number of other health professions in examination of overseas trained practitioners by the provision of the APC Clearing House – a business unit of the APC which delivers pen and paper examinations across the world. This business unit is sustainable due to the volume of exams delivered and significantly reduces the costs for other professions to carry out these examinations, who may otherwise only offer their examinations in Australia.
The APC has a contract to undertake some of the skills assessment services for the Chiropractic Council on Education Assessment, Australia.

Question 26: Is there an effective division of roles and functions between National Boards and accrediting authorities to meet the objectives of the National Law? If not, what changes are required?

As previously stated, the APC recognises the importance of the independence of the accreditation functions. Independence of the accreditation function, especially decision-making processes, from the influence of any single stakeholder is internationally recognised as a fundamentally important principle of accreditation. The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) Guidelines of Good Practice in Quality Assurance\(^1\) state that an external quality assurance agency ‘must be independent, i.e. it has autonomous responsibility for its operations, and its judgments cannot be influenced by third parties’.

The APC believes any loss of the independence of the accreditation functions under the Scheme would degrade the capacity to make decisions free of the influence of any other party and the integrity of the quality assurance aspects of the Scheme and would not be in the community’s interests or reflect the intention of the Scheme.

As stated earlier, the APC has an excellent, collegial and productive relationship with the Pharmacy Board of Australia (PBA, the Board). However, the APC is aware that this is not necessarily the case with all professions covered by the Scheme.

The relationship between the PBA and APC has taken some time to mature, but the APC has worked hard to achieve this relationship and gain the respect and trust of the Board. This has including developing and providing risk profiles on accredited programs to give the Board the confidence to approve programs that are accredited with conditions.

Given the co-dependence of all aspects of the Scheme, appropriate resourcing of the accreditation functions is essential to achieve the objectives of the Scheme. Further, the current requirement for accreditation councils to re-negotiate funding every year, despite their assignments running for periods of three years or longer, is seen as inefficient and also an impediment to longer-term strategic planning and thereby the overall effectiveness of the Scheme.

The APC is committed to working collaboratively across the professions, but there is no mechanism within the Scheme for funding of multi-profession projects. The APC supports the Forum in a request for formal incorporation of multi-profession work in the roles of both the Accreditation Authorities and the National Boards, backed by a funding stream, would assist in streamlining and finding efficiencies, and deliver more in relation to multi-profession approaches.

Question 27: Is there sufficient oversight for decisions made by accrediting authorities? If not, what changes are required?

The APC believes there is some oversight for decisions, but agrees that this could be improved.

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The current mechanisms include:

- Six monthly reports to the Pharmacy Board against the Quality Framework
- Development of good practice principles between National Boards, Accreditation Authorities and AHPRA
- AHPRA Procedures for the development of accreditation standards.

The Quality Framework was used in 2012, when the performance of the APC was assessed during the review of accreditation arrangements. The process of the review was considered jointly by the National Boards, AHPRA and the Accreditation Authorities. The process established required the APC to prepare a submission assessing its performance against the domains of the quality framework demonstrating and a wide consultation by the Pharmacy Board. These submissions were available publicly and the PBA consulted widely in making a decision about the review of the accreditation arrangements for their profession. The responses were positive for the APC and the assignment was extended until July 2018.

The Quality Framework requires accreditation authorities to have complaints, review and appeals processes which are rigorous, fair and responsive, and to report to their National Board on the complaints made. The APC appeals policy allows a University to seek independent review of recommendations and decisions concerning an accreditation decision. A Review Committee would be set up by the Australian Pharmacy Council (APC) Accreditation Committee and agreed by the University. It must include at least one head of an accredited school of pharmacy, one senior academic of another accredited school of pharmacy and one other person from another profession with experience in accreditation. The Review Committee would review the submission, relevant reports and documentation. It would have discretion to interview staff, students and other relevant people, and to inspect facilities where it concludes that such actions are necessary for it to make an informed judgment.

The APC is aware that the review and appeals practices vary across professions and will work with members of the Forum to develop good practice guidelines, develop a standardised feedback tool to gather feedback on accreditation processes from education providers, and agree on processes that would enable external input to the review of accreditation processes and decisions.

Thank you for the opportunity to respond to this consultation.

Should you require any further information on this submission, please do not hesitate to contact me.

Kind regards

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Australian Pharmacy Council

Bronwyn.clark@pharmacycouncil.org.au

10 October 2014