

The Australian Pharmacy Council (APC) welcomes the opportunity to provide feedback to the interim report. Below are both priority areas and the gaps we see for pharmacy.



Expand fast-track pathways

For pharmacy, we embrace the possibility of competent authority approaches and streamlining entry for similar countries, currently being UK, Ireland, US and Canada. To a large extent we already fast track these applicants through our Competency Stream program, which interestingly none of them currently offer similar routes for Australian pharmacists. We regularly review this process, and this year's review has identified at least one other country that could be included in this fast-tracked process. We also believe that the journey can be further streamlined, and have meetings set up with our UK regulatory body GPhC in July to progress this. But for pharmacy, this represents a very small proportion of the overseas candidates that are wanting to come to Australia.

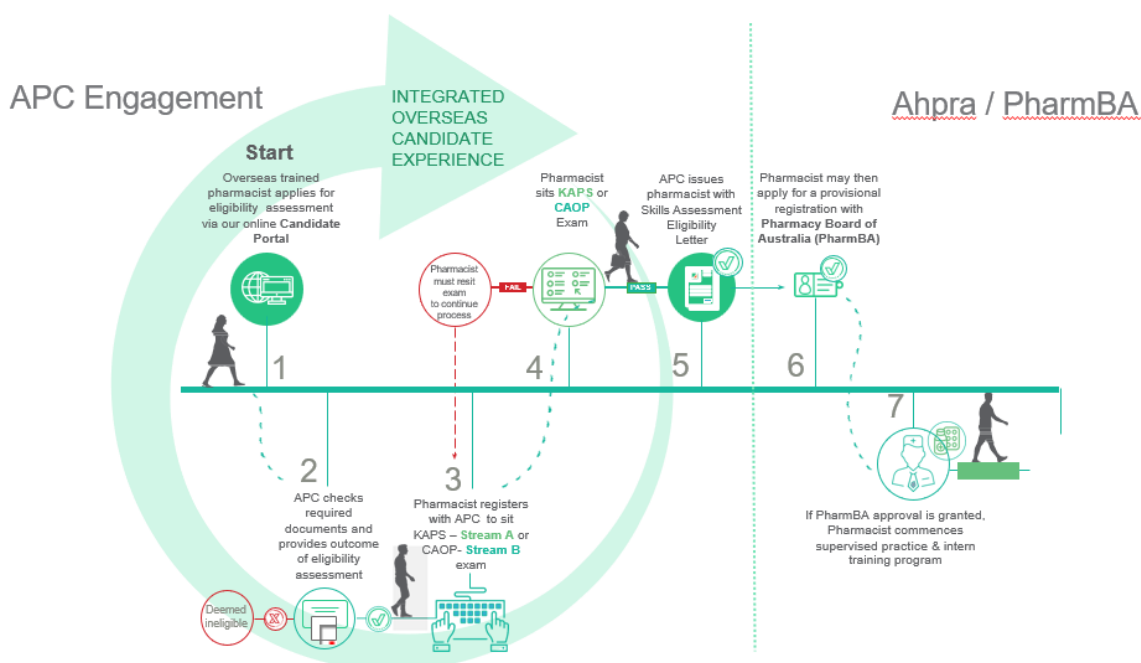
Pharmacy is absent in the report

Given the report focus is on medicine and nursing, pharmacy is not directly addressed. Pharmacy is not beset with the existing problems as described for medicine and nursing and we want to ensure that pharmacy does not fall victim to potential across the board changes resulting in negative consequences for pharmacy. We have worked hard to develop a user centred approach to our candidate experience from when they first engage with us, right through until they are accredited to provisionally register with Ahpra.

Improve the applicant experience

While we agree with reducing duplication, unlike medicine and nursing, overseas trained pharmacists only deal with APC right up to the point of applying for provisional registration with Ahpra. To fulfill the intent of recommendation 1, a simple data transfer from APC to Ahpra for the purpose of provisional registration processes could be easily established. We would welcome that. This would make the transfer of our already vetted data to Ahpra at point of provisional registration eligibility an eminently sensible approach to remove duplication and retain our holistic candidate experience already in place.

Overseas candidate journey to provisional registration



APC has a well-established single portal process already in place, and a personalised candidate support team which is highly effective for our profession and receives high praise from our candidates – particularly those that are experiencing difficulties. This connection remains right through their journey, including a seamless single onboarding process to register for their exam. This user centred approach has received strong support since inception in July 2022, and has allowed us to quickly scale operations and increase our personalised connection with candidates.

Overwhelmingly, overseas pharmacy candidates are coming from countries that require close attention from an accreditation perspective. Pharmacy practice is considerably different in these countries, with specific challenges and are often not covered by a structured country specific system of their own. This is why we dig deeper to understand each degree program to understand the baseline and take great care to understand the global pharmacy profession through our range of professional connections.

Except for NZ applicants, or any future competent authority pathway (see above), all overseas candidates need to pass one of our exams to be eligible for provisional or limited registration. We hope that our candidate relationship team that support overseas candidates right from the start of their journey through to provisional registration is not disrupted. Monthly, we currently receive more than 2,000 emails that we respond to in one business day and up to 3,000 phone calls that are managed in real time. We connect at a personal level and support overseas candidates through an end-to-end process. We are already seeing the benefits of this – we have been able to support a **four-fold increase** in demand this financial year through robust and personalised service delivery.

We are assessing qualifications from more than 160 different universities across the globe. Ready access to highly skilled professionals is often vital to a streamlined outcome for these candidates. Our interactions with the candidate up front ensure a seamless and personalised experience right up to and including their exam registration process - finding them a place at one of our 40+ overseas or domestic locations. All eligible candidates are able to be accommodated for an exam, which has been possible by constant investments in our systems and partner relationships. Our upcoming written knowledge exam will exceed 1,000 applicants – a **three-fold increase** on historic numbers, and this has been possible through our integrated processes and strong engagement. All successful applicants will be available to apply for provisional registration as soon as exam results are released.

Our staff are highly trained and connected to pharmacy professionals within our business structures, providing a holistic professional approach. Our processes are trusted and based on Department of Home Affairs and Department of Employment and Workplace Relations requirements.

APC is a not-for-profit organisation, ensuring that all fees received specifically support pharmacy accreditation services. We are hopeful that the current high demand being experienced (and delivered on) will continue to support our already mature systems and processes and our small, fixed cost base. This will ensure that we can service our candidates more cost effectively with this higher volume certainty and leveraging on our existing invested infrastructure.

Addressing the downstream problem – eligible candidates finding an internship

Most overseas pharmacists need to complete supervised practice to ensure they are safe and competent to meet the needs of our Australia community. For pharmacists, this generally includes an internship. We have long recognised that reforms in the intern training program could support this looming problem. For the last few years, APC has worked in collaboration with the Pharmacy Board to develop workplace-based assessment tools and build support processes to make it easier for preceptors to support provisionally registered pharmacists through their journey. This is fundamental to increasing the effectiveness of these programs, simplifying the process for preceptors, and addressing shortfalls at this juncture. Our capacity to continue to invest in these reforms have a profound impact for our profession.

Improve Workforce Planning

We welcome these recommendations. Pharmacy has been absent from national workforce planning, as outlined in the report. With expanding scopes of practice, and the ageing population, we are not meeting current or future demands. Pharmacists should be everywhere that medicines are, and the planning needed to forecast demand and supply will help assist this.

Cultural competency and cultural safety training

The recommendations are somewhat light on the training required to fill the gaps for overseas trained practitioners and their ability to work with our First Nations people. While recommendation F8 mentions the development of training and mentoring for Australian system and context, we would suggest this also includes understanding our First Nations people and their needs within our health system.

Thank you again for the opportunity to comment on the interim report.