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11 July 2022

Purpose of this submission

The Pharmaceutical Society of Australia (PSA) is pleased to make this submission in response to the Tasmanian Government Department of Health consultation on *Our Healthcare Future: Advancing Tasmanian's Health*. PSA's comments build on the feedback provided previously through consultations on *Our Healthcare Future*.

About PSA

PSA is the only Australian Government-recognised peak national professional pharmacy organisation representing all of Australia's 36,000 pharmacists working in all sectors and across all locations.

PSA is committed to supporting pharmacists in helping Australians to access quality, safe, equitable, efficient and effective health care. PSA believes the expertise of pharmacists can be better utilised to address the health care needs of all Australians.

PSA works to identify, unlock and advance opportunities for pharmacists to realise their full potential, to be appropriately recognised and fairly remunerated.

PSA has a strong and engaged membership base that provides high-quality health care and are the custodians for safe and effective medicine use for the Australian community.

PSA leads and supports innovative and evidence-based healthcare service delivery by pharmacists. PSA provides high-quality practitioner development and practice support to pharmacists and is the custodian of the professional practice standards and guidelines to ensure quality and integrity in the practice of pharmacy.

About pharmacists in Tasmania

In Tasmania, there are 900 registered pharmacists practising in diverse settings and locations including, for example: community pharmacies, public and private hospitals, aged care facilities, general medical practices, disability care homes, Aboriginal Community Controlled Health Organisations, poisons information centres, Primary Health Networks, public health organisations, academia, pharmaceutical industry, the military, and Tasmanian Government departments and agencies and within other private sector organisations.

Introduction

PSA appreciates the work undertaken to date on long-term reform by the Tasmanian Government with the objective of delivering integrated and sustainable health services for Tasmanians.

The use of medicines is the most common intervention made in health care and is steadily increasing. Many Tasmanians rely on medicines for acute, chronic or complex health conditions. Depending on individual circumstances, medicines are essential to support recovery from illness or injury, or may be required to maintain good health and minimise the need for serious or high cost medical interventions. Pharmacists oversee and facilitate safe and appropriate use of medicines to improve people's health and quality of life, treat infectious diseases, reduce likelihood of heart attacks or strokes, provide temporary relief from debilitating pain or ease the impacts of chronic diseases. Regular use of medication must be monitored and, if necessary, adjusted as a person's health or disease status changes over time. Medicines can also deliver flow-on benefits such as productivity through participation in the workforce and in the community.

The practice of pharmacists already aligns with the Principles and Strategic Ambitions articulated in the consultation paper to support a sustainable long-term Tasmanian health system. The focus of PSA's comments in this submission is to outline how best to utilise pharmacists' unique expertise to improve medication safety and quality use of medicines, promote timely access to medicines and preventive health care, improve health and digital literacy, and deliver seamless healthcare services to benefit all Tasmanians.

As the national peak body for pharmacists, PSA seeks opportunities to work in partnership with the Tasmanian Government and health, aged and disability sector organisations to co-design and deliver on the objectives of the long-term plan.

Comments on Supporting Principles

The principles underpinning the strategic roadmap for health are outlined in the consultation paper as being: **consumer centred, collaborative, innovative, integrated, equitable** and **evidence based**. These principles are interrelated and complementary, and strongly supported by PSA. All of the principles fundamentally underpin the professional practice of pharmacists and the healthcare services that they deliver to Tasmanians.

The care, wellbeing and safety of the person are at the centre of all aspects of pharmacy practice which is governed by a comprehensive framework of legal, professional and ethical standards. As the profession's standards-setting body, PSA is the custodian of pharmacists' competency standards, code of ethics, quality practice standards, professional guidelines and clinical governance principles framework. PSA is also regarded as the leading provider of high quality, accredited professional development education and training.

Pharmacists are committed to respecting and supporting the rights, choice and dignity of people and recognising diversity. Equity and timeliness of access to quality and safe care and delivering according to individual need and in a non-discriminatory manner are fundamentally important.

Pharmacists' practice is aligned with the [Australian Charter of Healthcare Rights](#) and supports the rights of people to receive safe, culturally responsive, high quality professional services. Pharmacists work to build mutual respect and rapport, engaging with people in an empathetic manner and considering issues such as mental health and physical or cognitive disabilities that may impact on care needs of vulnerable people. Pharmacists' practice also aligns with Australia's compliance with international obligations – for example, the United Nations Convention on the Rights of Persons with

Disabilities stipulates the need to tailor health care services to ensure people with disability receive the same “range, quality, and standard” of health care as the general population.

It is important that Tasmanian health services are contemporary and evidence-based. To maximise the benefits of such services, it will be vital that due consideration is given to the experience of individuals and families, co-design for transparency and empowerment, reduce duplication and burden, deliver synergies and innovation, and ensure effective coordination in the provision of holistic care.

Comments on the Strategic Ambitions

Pharmacists possess unique expertise on medicines and medication management, and are fundamentally committed to person-centred care, evidence-based best practice, collaborative team care arrangements and quality improvement. Pharmacists use their expertise in medicines to optimise health outcomes and minimise medication misadventure. Consistent with Australia’s *National Medicines Policy*, pharmacists have a primary responsibility to contribute to the quality use of medicines (QUM), to support the safe, appropriate, judicious and effective use of medicines. Pharmacists also have a key role in improving public health, investing in preventive health activities and services, and assisting patients, carers and other health practitioners with health and medicine related information and queries.

Better and more accessible community care

Community pharmacists and the pharmacy network. Pharmacists practise in a wide and diverse range of settings although the public and patients would generally be most familiar with pharmacists in community pharmacies. Australia has a well-distributed network of over 5,700 community pharmacies. Standards Australia’s *Quality Care Community Pharmacy Standard (AS 85000:2017)* forms the basis of the accreditation program for the practice of community pharmacy in Australia.

Community pharmacies are readily accessible and ideally placed to support regular health-related interventions, as well as rapidly implement emergency measures, as have been delivered during bushfires, floods and the COVID-19 pandemic. Community pharmacies are a key pillar in providing essential Pharmaceutical Benefits Scheme-subsidised medicines, preventive care services such as vaccinations, and other public health and safety measures to support and protect individuals and communities. Pharmacists are conduits of consistent health-related communications, provide information and education to improve health literacy and self-management, and lead medication safety goals and actions for individuals and the community. Pharmacists also triage individuals to best available healthcare services, coordinate and support continuity of health care, help patients navigate through digital health technologies and promote healthy behaviour.

Rural and remote Tasmanians. Community pharmacists are accessible and generally located close to where people live. Often in rural and remote regions, pharmacists are one of the only frontline healthcare providers. In such areas, in addition to supplying essential medicines and advising on medication management issues, pharmacists provide early intervention, triage and support for a variety of health conditions or events.

PSA suggests there must be greater flexibility to deliver tailored patient care, including in settings that best suit the needs of the patient in rural and remote locations, for example, in-home care, Aboriginal and Torres Strait Islander health centres or flying doctor clinics. Importantly, PSA strongly advocates for greater provision of services by pharmacists and for community pharmacies to be utilised as healthcare hubs in regions where other services are lacking, including facilitating telehealth appointments with other services and general practitioners.

After hours care. PSA suggests there must be continued efforts to increase patient access to after hours primary health care and triaging services. PSA re-iterates strong support for after hours pharmacy models – it is vital that we work to reduce the number of people presenting at emergency departments for minor ailments and medications. We suggest the services provided through the recent grant process should be made permanent and further, build on those and make provisions for additional offers.

Palliative care. PSA is pleased that the Government is committed to ensuring Tasmanians have access to the best possible palliative care when and where it may be needed. The role of community pharmacists in palliative care in the timely provision of medications, regular monitoring and review in partnership with patients and prescribers, and supporting patients, carers and families, is critical and growing. PSA has considerable experience in providing expertise and advice in developing palliative care and end of life care strategies, as well as supporting palliative care models of practice in various settings and jurisdictions.

Clinical governance framework for pharmacy services. Clinical governance is being progressively incorporated into health service sectors such as hospitals, commissioning bodies (e.g. Primary Health Networks), general practices, community pharmacies and Aboriginal Community Controlled Health Services. Building on the work of the Australian Commission on Safety and Quality in Health Care, PSA has developed *Clinical governance principles for pharmacy services* to support the design, delivery, management and review of pharmacist-led services to enhance safety and quality through governance, accountability and transparency. PSA believes measures should be included to support the implementation of a clinical governance framework and quality indicators for medication management and preventive health services delivered by pharmacists for Tasmanian people.

Strengthening prevention

Preventive health care is a core area that pharmacists already contribute to, but could do more, and therefore this Strategic Ambition is highly relevant to the profession for future planning. Some key priorities are listed below.

Vaccination services. Many people value the accessibility and availability of pharmacists delivering vaccination services in primary healthcare settings. Pharmacists have been critical to the rollout of COVID-19 vaccines and the gradual expansion in eligibility for influenza vaccination services delivered by pharmacists has continued to raise vaccination rates for Tasmanians. Pharmacists contributed to the rapid uptake of COVID-19 vaccines and helped to ease the health burden on Australians including vulnerable population groups. Pharmacists must continue to be allowed to deliver vaccines to prevent infectious diseases. PSA advocates for enabling pharmacists to deliver all vaccines, across all ages, at all locations.

Administration of medicines by injection. The scope of practice for appropriately trained pharmacists includes the administration of medicines by injection (including vaccinations), enabling pharmacists to provide consumers greater choice in the delivery of their health care.

Pharmacists administering medicines by injection is an emerging health need, playing an important role in increasing medicine safety and better patient health outcomes. The legislative environment in Tasmania supports appropriately trained pharmacists administering prescribed injectable medicines in many instances and PSA supports the work being done to improve access to injectable medicines, including in the opioid substitution space. PSA encourages the inclusion of appropriate remuneration to pharmacists to ensure consumers are able to have injectable medicines administered equitably regardless of the setting in which they are receiving care.

Climate change. PSA supports strategies to positively contribute to the Tasmanian Government's climate change goals. Due to the effects of climate change on the health and wellbeing of Tasmanians, we must collectively work towards limiting the negative impacts. PSA strongly suggests that pharmacists, and the pharmaceutical sector more broadly, will have substantive roles to work with the Government in developing and implementing environmentally sustainable clinical practices, and where possible, influencing more sustainable supply chain and manufacturing processes. PSA seeks appropriate resources to develop education and practice support materials to facilitate grassroots reductions in carbon emissions and practice changes aimed at preventing global warming. Community pharmacists also have an important ongoing public health role to facilitate safe collection and appropriate disposal of expired or unwanted medicines.

Partnering with consumers and clinicians

PSA notes that the focus of this section of the consultation paper appears to be on the partnerships around the future planning of the long-term reforms, rather than partnerships and collaborations in the context of delivery of healthcare services. In the following paragraphs, the focus is on the latter aspect i.e. PSA's view on the importance of multidisciplinary collaborative healthcare models.

Collaborative care arrangements. As part of the consultation on Australia's Primary Health Care 10 Year Plan 2022-2032, PSA proposed that collaborative commissioning through Australia's well-established network of community pharmacies must be considered to make the most of an accessible and well-distributed healthcare destination. Going forward, there must be flexibility and adaptability to allow exploration of innovative practices to advance healthcare service delivery and PSA firmly believes Tasmania has the collective expertise and will to demonstrate leadership in this regard.

Collaborative care arrangements are fundamental to the delivery of healthcare services by pharmacists. The true value of pharmacists' expertise is realised when they assume complementary roles with other healthcare professionals, work cooperatively, share responsibility for problem solving, and together make decisions to formulate and implement a person's health management plan.

Collaborative practice models are being developed, trialled, refined or taken up include arrangements to formally integrate pharmacists into teams in general practices, residential aged care facilities, Aboriginal and Torres Strait Islander healthcare services, hospital departments, chronic disease clinics and mental healthcare teams.

PSA strongly advocates for implementation and funding of practice models or care arrangements in Tasmania that enable pharmacists to provide clinical input through a multidisciplinary team arrangement with appropriate remuneration. Despite recognition of the benefits of multidisciplinary healthcare teams, including pharmacists, such arrangements are still considered unique rather than routine due to structural or financial barriers.

PSA has previously outlined that implementing pharmacist collaborative prescribing would have positive impacts for Tasmanians, including:

- Reduction in the use of psychotropic medicines/chemical restraints, improving the quality of life;
- Reduction in unplanned hospitalisations from medicine-related adverse events,
- More rational use of medicines – examples include:
 - opioid medicines, resulting in improved pain management.

- antimicrobials, resulting in use in accordance with local resistance patterns and treatment recommendations

PSA would welcome the opportunity to work with the Government to expand upon the successful collaborative prescribing arrangements implemented in Emergency Departments of Tasmanian Health Service hospitals into residential aged care facilities.

Scope of practice review. PSA believes long-term reform presents the ideal opportunity for the Tasmanian Government to give consideration to expanding the scope of practice (in a safe and appropriate manner) of all registered health professionals to improve Tasmanians' access to a broad range of comprehensive and innovative healthcare services.

For example, PSA has previously outlined that enabling pharmacists to practise to their full scope would have positive impacts for Tasmanians, including:

- increased access to vaccines
- increased access to administration of medicines by injection
- improving or ensuring continuity of care for people with chronic conditions which require medication
- improved medication safety and a reduction in medication-related issues.

Prior to the 2021 Tasmanian state election, both major parties committed to a scope of practice review for pharmacists in Tasmania. We have been told this will commence in the second half of 2022 and be expected to conclude in 2023.

It is envisaged that a review of pharmacists' scope of practice will draw on experiences and models of best pharmacist practice across Australian jurisdictions as well as internationally, learning from the innovative practices of pharmacists in countries including the United Kingdom and Canada. The review will be an enabler of increased provision of safe, accessible health care across our state. Furthermore, it will undoubtedly highlight the potential savings across health systems based on pharmacists being able to do more for their patients and Tasmanian communities.

PSA seeks to work in partnership with the Government and would be pleased to assist in the co-design of a scope of practice review for pharmacists and other healthcare professionals.

Building the health workforce

Attracting and retaining health professionals. Tasmania is experiencing a crisis of general practitioner shortage and challenges in pharmacist numbers. PSA urges the Tasmanian Government to work with the University of Tasmania to incentivise healthcare careers, and to attract and retain more health professionals, especially in primary care and particularly in rural areas.

PSA also strongly suggests that there must be alignment of health workforce incentives for all healthcare practitioners in rural and remote areas in order to foster improved integration and collaboration.

Building a healthy workforce is also aligned with PSA's desire to see elevation of scope of practice for primary care practitioners in order to increase professional satisfaction and hence, retention.

Pharmacists supporting healthcare workers. A core competency of pharmacists is to support the professional development of other members of the healthcare team. With regards to medication management practices, pharmacists can contribute to educating and assisting healthcare support

workers, for example in aged care facilities or disability group homes, to ensure safe medication handling and administration. This can improve medication safety and enhance patient satisfaction in healthcare services and, more importantly, support other registered health practitioners to focus on potentially more complex professional activities within their scope of practice, thus contributing to a healthy workforce. PSA would welcome the opportunity to contribute to co-design, development and delivery of education and training to healthcare support workers to enhance medicine-related capabilities.

Delivering the health infrastructure of the future

PSA believes that data integration must be a priority when considering innovation and sustainability in healthcare service delivery. The biggest failings in patient safety can come from ineffective communication, rather than a lack of clinical knowledge or skill. Data integration will deliver benefits through rapid and universal sharing of relevant, up-to-date information between health systems, health professionals and with consumers, contingent on consumer consent and participation.

PSA seeks to ensure the digital infrastructure that the Tasmanian Government invests in will enable safe and meaningful connections such as the merging or integration of hospital records with My Health Record, as well as connections with, for example, clinical software used for prescribing, dispensing, electronic medication charts, and other health service consultations or interventions.

Systems such as My Health Record are enablers of increased information for health professionals to enable improved care delivery. Digital systems more broadly need to evolve and be connected in a way that supports health professionals to deliver care. Without data integration between healthcare systems, health professionals are often ‘flying blind’ and having to rely on various sources to ascertain correct patient medication or healthcare details. This is not acceptable as, being unable to access current and accurate patient records, places patient safety at risk.

True connections of data and information will promote health system efficiencies, increased ability for pharmacists to be responsible and accountable for medication safety, improved health outcomes for patients, reduce local and system-wide duplication and wastage, and minimise harm from, for example, medication misadventure. These improvements are important for all Tasmanians, but particularly for vulnerable patients and high-risk healthcare settings such as at transitions of care.

Thus, PSA fully supports data integration in all health care with appropriate privacy provisions and transparency for patients. PSA works closely with health regulators and advocates for clear principles of accountability and transparency with regards to data use and handling. With due diligence, better use of data will help safeguard patients from the preventable harm medicines cause and maximise safe and effective use and better health outcomes for patients.

Strengthening Tasmania’s pandemic response

Reflecting on the COVID-19 pandemic experience to date, it is essential that we learn from it and address any shortcomings in the Tasmanian response, acknowledging that some health-related arrangements were impacted by parallel Commonwealth Government arrangements. We must continue to monitor the impact on Tasmanians, refine policies, build capacity, and create robust plans for the future.

PSA has appreciated the engagement of the Department of Health with the pharmacy profession during the pandemic, in the design and implementation of health- and medicine-related responses. We suggest, however, that policies and responses in future require a shift towards adoption of national responses and arrangements as much as possible, rather than relying on prescriptive, Tasmania-

specific details that require amendment each time there is a change to the national approach. A particular example is the vaccination standards for pharmacists administering COVID-19, influenza and other vaccines. Numerous changes to national guidelines have been, and continue to be, made with respect to dosing recommendations, age eligibility or other specified condition, resulting in inefficiencies and delays in formalising amendments to state-based documents for consistent arrangements. In PSA's view, it is essential that these practices are reformed as current processes are burdensome on pharmacists and prescribers, and often results in confusion and anxiety for patients and even impedes access to timely care.

Next steps

It is fundamental that future health service planning and delivery for Tasmania are accompanied by a person-centred approach and good governance. We must also be strong advocates for particular healthcare needs of high-risk and vulnerable population groups and individuals. Relevant patient groups and partners must be part of the co-design, development and implementation processes – otherwise reform efforts or innovation will not necessarily lead to improved outcomes.

A vibrant and viable healthcare workforce will be key to a sustainable and innovative healthcare system. To support timely delivery of appropriate healthcare services, Government commitment and investment are needed to ensure recruitment, retention and growth of healthcare professionals, including pharmacists, through innovative professional practice opportunities accompanied by fair and commensurate remuneration.

PSA looks forward to opportunities to work in partnership with the Government to advance Tasmania's health.