

13 July 2018

Mater Misericordiae Limited Submission to the HCDSDFVP Committee Pharmacy Inquiry

Executive Summary

Mater Group (Mater Misericordiae Limited) has owned and safely operated pharmacies since 1930 and sees no reason to reduce or limit Mater's ownership provisions detailed in the Pharmacy Business Ownership Act 2001, s139B and s139H.

Mater believes the current governance framework fully protects Queensland consumers and provides adequate protections to promote the professional, safe and competent provision of pharmacy services, and to maintain public confidence in the pharmacy profession.

Mater does not believe there are any gaps in the current regulatory framework that place the public at risk and that would be addressed by the establishment of another layer of regulation (and cost), namely a pharmacy council with a likely focus on physical infrastructure e.g. dispensary standards and pharmacy premises.

Further, the establishment of a new pharmacy council (with no experience or historical context), which would likely be heavily focussed on the community pharmacy sector, would bring considerable risk of unintended impacts for hospitals (both public and private) and in particular Mater.

Mater is particularly concerned about the risk of unintended but significant adverse consequences and scenarios that might cause disruptions to patient care, compromise existing patient safety processes and health outcomes and the efficient functioning of our operations from any new regulatory regime for pharmacy operations and/or premises.

Mater supports pharmacists having the opportunity to practise to their full scope of practice and to develop new roles and scopes of practice, which are based on evidence of safety, clinical competence and quality.

Mater Group (Mater Misericordiae Limited)

Mater Group (Mater Misericordiae Limited) began in Brisbane in 1906, as a healthcare ministry of the Sisters of Mercy. Mater has since grown to become one of Australia's most significant not-for-profit providers of health care, education and research.

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Mater operates six hospitals at three campuses and delivers contemporary, evidence-based healthcare services for insured and uninsured patients, without discrimination.

Mater facilities and services include Mater Hospital Brisbane, Mater Children's Private Brisbane, Mater Mothers' Hospital, Mater Mothers' Private Brisbane, Mater Private Hospital Brisbane, Mater Private Hospital Redland and Mater Private Hospital Springfield.

Mater's commitment to clinical excellence in the context of our Mission to meet unmet need drives our approach to healthcare in the hospital, and beyond.

Mater strives to deliver high-quality, low-variability, evidence-based care for all patients each and every time. Mater's goal is to provide the highest standards of clinical excellence, and in line with the organisation's Mission, Vision and Values.

Mater has owned and operated pharmacies since 1 July 1930 when Sister Mercia Mary opened firstly the Retail Private Hospital Pharmacy (later the Mater Private Pharmacy) and then shortly after the Mater Public Hospital Pharmacy.

This 88 year heritage of owning and operating pharmacies is regulated by and specifically authorised under the Pharmacy Business Ownership Act 2001, s139B and s139H.

Today Mater Pharmacy provides comprehensive pharmacy services to all Mater facilities as well as owning and operating three community pharmacies servicing external clients of private medical practices, residential aged care facilities and home medication reviews. Mater Pharmacy also provides support for commercially sponsored local, national and international clinical trials and university-based research works.

Mater Pharmacy, as part of Mater Misericordiae Limited, focusses on the advancement of quality patient care, clinical education and research in a safe and harmonious environment for all and is guided by Mater's Mission, Values and Ethics.

Mission, Values and Ethics

Mission

In the spirit of the Sisters of Mercy, Mater offers compassionate service to the sick and needy, promotes an holistic approach to health care in response to changing community needs and fosters high standards of health-related education and research.

Following the example of Christ the healer, we commit ourselves to offering these services without discrimination.

As a Catholic not-for-profit ministry, we are committed to a holistic approach to health care in response to ever-changing community needs. We continually strive to improve how we deliver patient care, keep our knowledge and skills relevant, advance our understanding of illness and health and manage resources effectively.

Mater Values

Mater staff are dedicated to providing highest quality health care services, through a sincere commitment to Mater's core values of Mercy, Dignity, Care, Commitment and Quality. Using these values as a guide for our interactions with our patients and their families, each other and our business partners, Mater staff promotes the professionalism and care that has been a part of the Mater since its beginnings.

Our Values

Mercy – the spirit of responding to one another.

By being merciful we can bring forgiveness, joy, peace, kindness, compassion and hope to all in our care.

Dignity – the spirit of humanity, respecting the worth of each person.

Each person we encounter in our working day—patients, visitors, co-workers—deserve our respect.

Care – the spirit of compassion.

We show that we care for one another by being sensitive to each other's needs and showing kindness.

Commitment – the spirit of integrity.

Being committed to those who entrust themselves to us is a responsibility we take seriously.

Quality – the spirit of professionalism.

We strive to be leaders in our fields and to combine those skills with humanity and warmth.

Our Ethics

As a Catholic health care provider Mater follows a code of ethics as outlined in the Code of Ethical Standards for Catholic Health and Aged Care Services in Australia.

Mater Priorities

Safety

At Mater, there is nothing more important than safety. We do not seek credit for this; it is inherent in the Mater experience and should be clearly evident to our staff, our patients and our visitors in all that we do. Every decision and every action taken by Mater People has safety as its guiding principle.

Experience

Mater People value customer service and consumer experience as a crucial part of each and every interaction. We know that the same motivation which drives us to deliver exceptional clinical outcomes should drive our approach to service. We seek to meet or exceed each and every person's service expectations, each and every time.

Quality

At Mater we believe that quality comes of consistently seeking to provide safe, people-focused healthcare experiences. Delivering evidence-based, low variability healthcare, exceptional individualised customer service and a genuine commitment to Mater's Values requires that all Mater People constantly seek to improve the quality of our service.

Efficiency

As a not-for-profit provider of health, education and research services, Mater People must seek opportunities to deliver services for more people, which means being innovative and focussed and by demonstrating strong stewardship of our finite resources. At Mater this is managed in line with the Values of the organisation and with respect for and by each individual.

Future viability

Consistently meeting the needs of the community means always seeking to improve, to innovate and to evolve. Mater People are charged with the responsibility to look for new trends and opportunities which will ensure Mater can meet the challenges of the future by making sensible decisions today.

Response to Terms of Reference

Establishment of a pharmacy council

Mater has owned and safely operated pharmacies since 1930 and would therefore see no reason to reduce or limit Mater's ownership provisions detailed in the Pharmacy Business Ownership Act 2001, s139B and s139H.

All Mater facilities and services (i.e. hospitals and pharmacies) meet all industry quality standards and hold full accreditation under the Pharmacy Guild of Australia's Quality Care Pharmacy Program (QCCP) and importantly the National Safety and Quality Health Service (NSQHS) Standards developed by The Australian Commission on Safety and Quality in Healthcare to drive the implementation of safety and quality systems and improve the quality of health care in Australia. The eight NSQHS Standards (including Standard 4 Medication Safety) provide a nationally consistent statement about the level of care consumers can expect from health services.

Further Mater and its healthcare practitioners are already regulated by:

- Mater Public Health Services Act 2008
- Queensland Health Private Health Facility Licensing
- Pharmacy Business Ownership Act 2001
- Health Act 1937:
 - Health (Drugs and Poisons) Regulation 1996
 - Health Regulation 1996
- The Office of the Health Ombudsman

- The Australian Health Practitioner Regulation Authority (APHRA) and specifically in respect to pharmacy, the Pharmacy Board of Australia (PBA)

Mater believes this governance framework fully protects Queensland consumers and provides adequate protections to promote the professional, safe and competent provision of pharmacy services, and to maintain public confidence in the pharmacy profession.

Given Queensland has never licensed or regulated pharmacy premises and that there is no definitive evidence of any particular risk to the public from the current situation where there is no premises regulation, Mater does not believe there are any significant gaps in the above regulatory framework that place the public at risk and that would be addressed by the establishment of another layer of regulation (and cost), namely a pharmacy council with a likely focus on physical infrastructure such as dispensary standards and pharmacy premises.

Over the past 88 years Mater Pharmacy has uniquely provided both public and private services to Queenslanders and this has resulted in unique and highly complex models of care and business models:

- Public and private hospitals and pharmacy services (Section 94 and Section 90 PBS approvals)
- Secondary and tertiary referral hospitals across multiple campuses and geographical locations and Hospital and Health Services
- Community pharmacies
- Residential aged care services (medication supply and medication reviews)

Given these complex models of care and business models Mater is also particularly concerned about the risk of many unintended but significant adverse consequences and scenarios for patients, health outcomes and our operations from any new regulatory regime for pharmacy operations and/or premises.

Any regulatory change brings this risk but rushed, unplanned or poorly defined changes can create major disruptions to care and compromise patient safety.

The establishment of a new pharmacy council (i.e. with no experience or historical context) and which would likely be heavily focussed on the community pharmacy sector (i.e. limited focus on hospital settings) would bring considerably more risk for hospitals (both public and private) and in particular Mater.

An example of the likely community pharmacy focus of any registration of pharmacy premises is contained in The Pharmacy Guild of Australia (PGA) Background Brief (p2), which references supermarkets:

Registration of premises

Premises should be required, as a part of registration, to meet specified physical standards to ensure they are suitable for the safe and competent provision of pharmacy services, including restrictions on the operation of pharmacies from premises within or accessible from supermarkets.

Unintended consequences (across the whole pharmacy sector) resulting from any paradigm change to the regulatory model would need to be thoroughly evaluated through widespread and detailed consultation on the proposed operation of the model before any legislation was considered by the parliament. Further, appropriate transitional arrangements would be required prior to any implementation.

Pharmacists' and pharmacy assistants' roles and scope of practice

Mater employs over 100 pharmacists and pharmacy support staff whose focus is the safe and efficient delivery and administration of medication supply services and patient medication management.

However the role of pharmacists should not be inhibited by the current thinking or perception of what pharmacists are primarily involved in - commonly understood to be predominantly related to the physical supply of medications.

As a modern health service that seeks to translate research into practice in a structured and timely manner to deliver best practice care for our patients, Mater needs all its employees to be able to practice to their full scope of practice under a clinical governance framework that underpins safety and quality.

Increasingly the provision of evidence-based care using innovative health programs requires services to be delivered by multi-disciplinary healthcare teams. These teams deliver patient-centred outcomes through a strong focus on integration and collaboration rather than traditional roles or tasks.

The role of pharmacists in medication management is increasingly important due to the increasing complexity, customisation and cost of medicines. Pharmacists can make valuable contributions to patient care and improved efficiency of health services through innovative roles such as completion and authorisation of medication charts, optimisation of therapy via dose modification or therapeutic substitutions and continuation of supply of chronic disease medications when routine prescriptions have expired.

Indeed the profession, with the guidance and support of the Pharmacy Board of Australia, has recently initiated a comprehensive process to evaluate the feasibility of pharmacist prescribing as required by AHPRA guidelines. (AHPRA Guide for National Boards developing submissions under the AHMAC Guidance for National Boards: Applications to the Ministerial Council for approval of endorsements in relation to scheduled medicines under section 14 of the National Law).

With respect to additional training and other risk reduction measures for new pharmacist roles and scopes of practice, it is important to note that pharmacists are AHPRA registered health professionals who already practice under a multi-layered risk management framework consisting of:

- Professional responsibility and ethics
- Professional Practice Standards
- AHPRA /PBA registration which is underpinned by standards and guidelines on competency, responsibility and accountability
- Documented organisational clinical governance & risk management processes (as is the case at Mater)

In recent years, pharmacists and more broadly the pharmacy profession have demonstrated their professionalism, patient safety and risk management credentials when vaccination by pharmacists was carefully, methodically and safely implemented across Australia- resulting in greatly improved community access to safe, convenient and cost effective vaccination services.

It is important that Queensland's regulatory process and resulting framework is contemporary and responsive so that the development of innovative roles and scopes of practice for both pharmacists and pharmacy assistants is not unnecessarily hindered. Indeed, they should fully support both current and emerging roles and scopes of practice that help meet patient needs and service demands.

Signed

A handwritten signature in black ink, appearing to be 'John Prins', with a stylized, flowing script.

Prof John Prins
Acting Group Chief Executive Officer
Mater Misericordiae Ltd