



Health Complaints (Code of Conduct) Regulations 2024 (Tasmania)

April 2025

Introduction

Formerly known as the Society of Hospital Pharmacists of Australia (SHPA), Advanced Pharmacy Australia (AdPha) is the progressive voice of Australian pharmacists and technicians, built on 80 years of hospital innovation that puts people and patients first. AdPha supports all practitioners across hospitals, transitions of care, aged care and general practice clinics to realise their full potential. We are the peak body committed to forging stronger connections in health care by extending advanced pharmacy expertise from hospitals to everywhere medicines are used.

AdPha Tasmanian Branch welcomes the opportunity to comment on the Health Complaints (Code of Conduct) Regulations 2024, and in principle supports the Tasmanian Government progressing action to implement the Code in Tasmania. AdPha, however, recommends further consideration of how the Code can be applied to the unregistered healthcare workforce such as pharmacy technicians and assistants, compared to non-National Registration and Accreditation Scheme (NRAS) professions or the 'self-regulated' health professionals.

AdPha understands that within the community pharmacy sector, pharmacy assistants and technicians are employed under a retail award and that community pharmacy qualifications fall under the SIR Retail Services Training Package coding. These positions are more likely to be defined as "pharmacy sales assistants" (ANZCO 6214) in ABS data which does note their involvement in providing advice about application and storage of medicines and providing advice on non-prescription medicines. These individuals are highly involved in patient care and frequently providing health information to patients both independently, as is within their scope, and under direction of a pharmacist.

However, part 5b of the code stipulates that exclusions apply to those involved *in 'the provision of information relating to the promotion of health education'*. AdPha therefore strongly advocates that pharmacy technicians should be considered as part of this group

of unregistered health professionals as defined in the Code, and its application to pharmacy technician practice would require further clarity.

In the hospital setting, the application of the Code of Conduct is more clearly defined, as pharmacy assistants and technicians are directly employed by health services and are generally recognised as integral members of the healthcare workforce. Their qualifications are classified as health-related, and they are more frequently categorised as Pharmacy Technicians (ANZSCO 311215) in ABS data, under the “medical technician” classification.

As pharmacists expand their role to alleviate healthcare system strain and pressures medical colleagues, pharmacy technicians must also be supported to evolve their practice. In addition to developing the Pharmacy Technicians Competency Standards, AdPha has designed Australian and New Zealand College of Pharmacy (ANZCAP) recognition of pharmacy technician career progression and speciality skills.

AdPha also convenes a Technician and Assistants Speciality Practice Group with over 200 active members and previously developed a *Standard of Practice for Pharmacy Technicians to support Clinical Pharmacy Services*¹, setting the benchmark for the profession across all sectors.

Pharmacy technicians’ evolving roles and responsibilities are also outlined in the recently updated *Advanced Pharmacy Australia Clinical Pharmacy Standards*². These can be referred to to guide any investigation into pharmacy technician and assistant code of conduct.

Lastly as outlined in Part 16, it is unclear how the requirements of healthcare workers to be covered by appropriate indemnity insurance may apply to pharmacy technicians who are not required to hold indemnity insurance in the same way that pharmacists and other registered health care professionals are currently obliged to.

If you have any queries or would like to discuss our submission further, please contact Jerry Yik, Head of Policy and Advocacy at jyik@adpha.au.

References

¹ The Society of Hospital Pharmacists of Australia. (2019). Standard of Practice for Pharmacy Technicians to support Clinical Pharmacy Services. Journal of Pharmacy Practice and Research.

² Dooley, M., Bennett, G., Clayson-Fisher, T., Hill, C., Lam, N., Marotti, S., O'Hara, K., Potts, C., Shum, B., Tong, E., Trevillian, S., Sharp-Paul, N., Newman, S. and Mellor, Y. (2024). Advanced Pharmacy Australia Clinical Pharmacy Standards. J Pharm Pract Res. Available at: <https://doi.org/10.1002/jppr.1959>