



12 December 2022

Stefan Tulloch
Senior Manager, Health Practitioner Compliance Monitoring and Industry Licensing
Medicines and Poisons Regulation
Regulatory, Risk, Integrity and Legal Division
Victorian Government, Department of Health
Via email: dpcs@health.vic.gov.au

Dear Stefan

RE: DPCS Regulations 2017 – Transmission of a digital image of a paper prescription in an emergency

The Society of Hospital Pharmacists of Australia (SHPA) is the national, professional organisation for the 6,100+ hospital pharmacists, and their pharmacist intern and pharmacy technician colleagues working across Australia's health system, advocating for their pivotal role in improving the safety and quality of medicines use.

The SHPA Victorian Branch Committee welcomes the opportunity to provide feedback to the Victorian Government on the proposed amendment of the Drugs, Poisons and Controlled Substances (DPCS) Regulations 2017 (transmission of a digital image of a paper prescription in an emergency). SHPA provides in principal support to the proposed amendment with a few comments for consideration.

SHPA Victorian Branch Committee members recommend the condition referring to 'a valid paper prescription is written and signed by the prescriber' is broadened to include the generation of a digital image in an electronic system, signed electronically and saved to be printed at a later time, and provided to the pharmacist.

SHPA Victorian Branch Committee members also recommend the condition suggesting that the digital image of the prescription be 'transmitted by the prescriber directly to a pharmacist or pharmacy of the patient's choice' is expanded to include, the prescriber or an authorised delegate such as the hospital pharmacist or a hospital administrative assistant. This is currently occurring routinely in practice as prescribers do not have the time to send off prescriptions to pharmacies. It is therefore important that the regulation formally acknowledges this and makes allowances for it.

The proposed electronic mechanisms for transmission of a digital image of a prescription are sufficient, however, thought should be given as to whether facsimile is still considered a contemporary means of communication accessible to health professionals.

SHPA Victorian Branch Committee members question the feasibility of the proposed three-day timeframe for prescribers to send pharmacists the paper prescription following provision of a digital image. Three days may not be sufficient time, especially over prolonged periods of public holidays and when the postal services experience unexpected delays due to pandemics and natural disasters.



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SHPA Victorian Branch Committee members encourage the department to introduce the proposed amendments as soon as practicable, in order to support stage three of the COVID-19 response which promotes telehealth services.

If you have any queries or would like to discuss our submission further, please do not hesitate to contact Jerry Yik, Head of Policy and Advocacy on yyik@shpa.org.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'John Evans', with a small flourish at the end.

John Evans
Chair, SHPA Victorian Branch Committee



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