

16 October 2015

Mr Neil Keen
Chief Pharmacist
Department of Health
PO Box 8172
PERTH WA 6849

Re: MEDICINES AND POISONS REGULATIONS 2015

Thank you for the opportunity to comment on the proposed regulations to include in the Medicines and Poisons Regulations 2015, for efficient and effective management of medicines and poisons. We have provided comment below for your consideration.

The APA believes that state and territory legislation and regulation should support non-medical prescribing and congratulates Western Australia for proposing legislative reform that allows for this. However, the APA recommends that physiotherapists are supported in non-medical prescribing.

Enabling the physiotherapist to prescribe directly presents an opportunity to improve efficiency by reducing the time and cost that goes into providing care to the patient. There is a potential to improve **quality of care** – derived through improved care continuity and will result in savings of \$9.2 million to consumers and the health system by avoiding unnecessary trips to GPs and referral loops.

The APA recommends appropriately credentialed physiotherapists to be endorsed as qualified to administer, obtain, possess, prescribe, sell, supply or use a scheduled medicine or class of scheduled medicines from groups of medicines related to their scope of practice

Appropriately qualified and endorsed physiotherapists in the UK, for example, may prescribe any licensed medicine from the British National Formulary (BNF). They may prescribe within national and local guidelines, provided it falls within their individual area of competence and scope of practice, and within the overarching framework of human movement, performance and function.

If a prescriber prescribes a substance that is not within the scope of practice, it is a matter of practitioner conduct and may be investigated by the UK's health professions' regulator, the Health and Care Professions Council (HCPC).

The Australian Physiotherapy Association (APA) supports the potential outcomes of the proposed regulations to compliment the Medicine and Poisons Act, 2014

Australia urgently needs to reform healthcare to ensure it is accessible, affordable and sustainable, particularly for people in rural and remote regions for Aboriginal and Torres Strait Islanders, for older people, and for the vulnerable and disadvantaged. These members of our communities often have poorer health and rely more on publicly funded healthcare.

Under the current regulatory framework a range of healthcare workers are only able to add a proportion of the increased value to improved healthcare of which they are capable. Extending prescribing responsibilities to qualified and endorsed non-medical practitioners, however, will create safe, innovative ways of working that improve the quality of services and the patient experience.

Reform will help form partnerships across traditional professional and organisational boundaries. It will build better care that is more cost-effective and sustainable, and will ensure patients receive the right treatment at the right place and at the right time.

State and territory legislation and regulation should be flexible enough to provide for ongoing changes in the health sector. These changes are necessary to respond to well-known drivers, and will lead to greater collaboration between professions, the increasing overlap in scopes of practice and the practice of non-medical prescribing.

The APA supports rigorous systems that ensure patients receive quality healthcare and are safe when taking medicines.

Patient safety is currently ensured by a robust framework of medicines and prescribing legislation, governance practice and procedures, and professional codes of practice. Mechanisms are also in place to report and monitor the use and effects of medicines, and rigorous training and continued education maintain quality practice, as proposed by the HPPP.

We welcome the further extension of these safety and quality frameworks to non-medical prescribers, and believe they provide a strong and established method for protecting consumers.

We welcome efforts to encourage, support and enable improvements in safe and quality healthcare, and look forward to Western Australia's reforms.

If you have any queries or wish to discuss this submission further, please contact Richard Attwood, Senior Policy Advisor, richard.attwood@physiotherapy.asn.au (03 9092 0840)

Yours faithfully,



WA Branch President
Australian Physiotherapy Association