victorian pharmacy authority

Consultation on the draft Victorian Pharmacy Authority Standards

The consultation period closes at **5.00 p.m. Friday 30 July 2021**

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1. Background and context

The Victorian Pharmacy Authority is seeking feedback on draft standards relating to the operation of pharmacies, pharmacy businesses, pharmacy departments and pharmacy depots.

1.1. Introduction

The Victorian Pharmacy Authority (the Authority) regulates pharmacies, pharmacy departments and pharmacy depots in accordance with the *Pharmacy Regulation Act 2010* (the Act).

The Authority's functions under the Act include to issue standards in relation to the operation of pharmacies, pharmacy businesses, pharmacy departments and pharmacy depots. The Authority has not issued any standards to date, only guidelines.

The Authority has developed draft standards (the Standards). The Standards will provide clarity to licensees and stakeholders in relation to mandatory requirements.

The Standards will be supported by the Victorian Pharmacy Authority Guidelines (the Guidelines). The Guidelines represent the current policies of the Authority and are published on the Authority's website at www.pharmacy.vic.gov.au.

The Authority believes that certain matters are no longer suited to being the subject of a (flexible) guideline and these guidelines should be elevated to a standard.

The Authority consults with licensees and other stakeholders on an annual basis prior to issuing updated guidelines. The Authority plans to revise the Guidelines to ensure they integrate with and support the Standards and continue to assist licensees to comply with the Act.

1.2. Purpose and benefits of issuing Standards

The Guidelines detail how a licensee may meet the requirements of the Act and form the basis of the Authority's application process for approval of registered premises and its inspection program. Licensees and applicants are aware that satisfying the Guidelines is expected and departures from them are required to be justified on a case-by-case basis.

The Standards, many of which are based on existing guidelines, will be mandatory requirements for the operation of pharmacies, pharmacy businesses, pharmacy departments and pharmacy depots. They cover the responsibilities of proprietors and premises-related requirements that impact public safety.

Standards that are consistent with the requirements of the Act and supported by appropriate guidelines will enable the Authority to fulfil its regulatory responsibilities more effectively and clarify responsibilities and requirements to licensees and stakeholders.

The Authority does not expect the Standards to impose any significant additional burden on licensees, applicants, and stakeholders. This is because the Standards are derived from the Act, the Guidelines or legislation and reflect existing minimum standard expectations. As such, applicants and licensees are already expected to satisfy the requirements of the Standards.

A limited number of new requirements have been introduced to address high-risk areas identified by the Authority. These relate to:

- storing scheduled poisons in accordance with drugs and poisons legislation;
- maintaining records for scheduled poisons in accordance with drugs and poisons legislation; and
- reconciling records of Schedule 8 and Schedule 9 poisons against actual balances, at least quarterly (not specifically mandated by drugs and poisons legislation).

Stakeholders will be given notice of the introduction of the Standards.

1.3. What happens if the Standards are not met?

The Authority may

a) have regard to an applicant's compliance with any standards issued by the Authority in determining whether to grant a licence or registration [sections 38(2)(a), 39(2)(c), 46(1)(c) of the Act];

b) investigate a licensee's compliance with an Authority standard or if the registered premises meet an Authority standard (section 53 of the Act). The Authority may convene a panel hearing in respect of matters that have been the subject of an investigation (section 57 of the Act); and

c) revoke a license or a registration if the licensee has contravened a standard on one or more occasions and the Authority believes it is against the public interest for that person to continue carrying on a pharmacy business or pharmacy department, or a breach of the Standards presents a serious risk to public safety (section 55 of the Act).

Given that the Standards are largely drawn from the Act, the Guidelines and existing legislative requirements, it is not expected that licensees will have to change the way they operate under current requirements to be compliant with the Standards.

1.4. Structure of the Standards

The Standards are grouped into seven categories as follows:

1. Licensee responsibilities
2. Premises
3. Equipment and references
4. Records
5. Policies and procedures
6. Specialised services
7. Quality improvement and risk management.

The Standards will be supported by the Guidelines to assist licensees to meet their obligations. The existing Guidelines will be updated in due course to reflect the Standards following a period of stakeholder consultation.

2. The consultation process

2.1. Overview

The consultation will be open for a period of four weeks and will close at 5.00 p.m. on Friday 30 July 2021. Licensees, pharmacists, industry peak bodies and members of the public are invited to review the draft Standards and provide feedback.

The purpose of the consultation is to ensure that the draft Standards are clear, easy to understand and capable of being met.

Feedback may be provided using the consultation questionnaire which is set out in three sections;

- Section A contains identifier questions;
- Section B contains questions relating to the 'Introduction and interpretation' section of the draft Standards; and
- Section C contains questions relating to the Standards and includes opportunity for more detailed feedback to be provided.

2.2. How to respond

The consultation questionnaire is available for completion as an online survey. Click on the following link to complete the questionnaire,

https://forms.office.com/r/Pz3At1FUyb

To assist in the preparation of your response, a copy of the questionnaire is provided as Appendix A.

2.3. Contact

If you have concerns or comments in relation to the consultation process, please send them to: enquiries@pharmacy.vic.gov.au

2.4. Consultation responses

PharmConsult has been engaged by the Authority to collate the consultation responses. The Authority will consider these responses prior to submitting the Standards for approval by the Victorian Minister for Health.

3. The draft Victorian Pharmacy Authority Standards

Introduction and interpretation

About the Victorian Pharmacy Authority

The Victorian Pharmacy Authority ('the Authority') is responsible for the administration of the *Pharmacy Regulation Act 2010* ('the Act') which regulates the ownership and operation of pharmacy businesses, pharmacy departments and pharmacy depots.

The Authority's functions and powers under the Act include:

- licensing a person to carry on a pharmacy business or a pharmacy department;
- registering the premises of pharmacy businesses, pharmacy departments and pharmacy depots, herein collectively referred to as registered premises unless specified individually;
- maintaining a public register of all licensees and registered premises;
- issuing standards in relation to the operation of registered premises;
- inspecting registered premises to ensure that standards are being met and maintained.

Scope and application of the Standards

These standards, issued by the Authority ('the Standards'), have been approved by the Victorian Minister for Health as required under section 86 of the Act.

The Standards reflect the requirements of the Act, including the Schedule to the Act and are supported by the Victorian Pharmacy Authority Guidelines ('the Guidelines'). They should be read in conjunction with these documents.

In undertaking its functions under the Act, the Authority must be satisfied that the facilities, equipment, security, management and operation of the registered premises comply with the Act and good pharmacy practice.

In relation to good pharmacy practice, the Authority recognises the standards, guidelines, codes and policies issued by the Pharmacy Board of Australia and has regard to standards, codes and guidelines issued by the Pharmaceutical Society of Australia, The Society of Hospital Pharmacists of Australia, Victorian Department of Health and Therapeutic Goods Administration.

Please refer to the Guidelines for further information on the current and relevant standards, guidelines, codes and policies.

The Standards apply to all registered premises in Victoria, except where specifically excluded.

The licensee is responsible for meeting the Standards.

What happens if the Standards are not met?

The Authority may investigate a licensee's contravention of an Authority standard or if the registered premises do not meet an Authority standard (section 53 of the Act). The Authority may convene a panel hearing in respect of matters that have been the subject of an investigation (section 57 of the Act). The Authority may revoke a license or a registration if the licensee has contravened a standard on one or more occasions and the Authority believes it is against the public interest for that person to continue carrying on a pharmacy business or pharmacy department, or a breach of the Standards presents a serious risk to public safety (section 55 of the Act).

Structure of the Standards

The Standards are grouped into seven categories as follows:

1. Licensee responsibilities
2. Premises
3. Equipment and references
4. Records
5. Policies and procedures
6. Specialised services
7. Quality improvement and risk management.

Each of the categories includes an overlying principle, and each principle is supported by a number of related standards. The principles describe the desired outcome which will be achieved by compliance with the Standards.

Key terms

Term	Meaning in this document
Complex compounding	means the preparation and supply of a single 'unit of issue' of a therapeutic product that is intended for supply to a specific patient. It requires or involves special competencies, equipment, processes or facilities and includes aseptic compounding. It does not include the manipulation of products as per manufacturer's instructions, to make a 'ready to administer' form.
Current references	are detailed in the Guidelines and include any essential references specified by the Pharmacy Board of Australia.
Drugs and Poisons legislation	refers to the Drugs, Poisons and Controlled Substances Act 1981 and any regulations made under this act.
Pharmacist regularly and usually in charge (PRUIC)	is the pharmacist who is regularly and usually in charge of the registered premises and can be the proprietor or a pharmacist appointed to that position.
Pharmacy services	includes the supply, compounding and dispensing of medicines, the provision of advice and counselling on the effective and safe use of medicines and a wider range of specialised services to support these functions.
Registered premises	refers to pharmacy businesses, pharmacy departments or pharmacy depots, as defined under the Act, which are registered by the Authority.
Specialised services	are pharmacy services which often require specific training, competencies and equipment. These include, but are not limited to, complex compounding, provision of dose administration aids and automated unit- dose packing, opioid replacement therapy, vaccination services.

The Standards

1. Licensee responsibilities

Principle

The licensee is responsible for the delivery of pharmacy services, through appropriate governance and effective oversight, that are consistent with the law and good pharmacy practice. Patient and public safety are paramount and the risk of causing harm must always be considered as part of the delivery of pharmacy services.

The licensee holds responsibility for the carrying on of a pharmacy business or pharmacy department in accordance with the Act.

Where there is a partnership or corporate ownership, the responsibility is shared by partners or directors and does not sit with one single individual.

Governance arrangements include having clear definitions of the roles and accountabilities for the people involved in providing and managing pharmacy services. It also includes the arrangements for managing risks, and the way the registered premises is managed and operated.

Standards	
1.1	The licensee is responsible for compliance with the requirements of the Act, these Standards and any conditions imposed by the Authority.
1.2	The licensee is responsible and shall provide for the effective management of the pharmacy business or pharmacy department by:
a)	i. acting as the pharmacist regularly and usually in charge; or ii. appointing a pharmacist to be regularly and usually in charge; and iii. notifying the Authority, in each case.
b)	ensuring that: i. employed pharmacists hold appropriate and current registration; ii. there is sufficient suitably qualified staff on duty to undertake the range of services being provided by the pharmacy and in a manner which ensures patient and public safety; iii. the minimum complement of staff supports service demands and a safe working environment, and ensures public and patient safety; iv. staff comply with professional and legal obligations; v. staff have access to current references; vi. policies and procedures are developed, maintained and readily available to all staff, and are being followed; vii. the delivery of pharmacy services complies with legislation and follows good pharmacy practice; viii. the storage, disposal and record keeping of medicines complies with legislation and follows good pharmacy practice; ix. the management of Schedule 8 poisons complies with drugs and poisons legislation.

2. Premises

Note: This category does not apply to pharmacy depots

Principle

The design, condition and security of registered premises provide an appropriate environment for the safe custody of medicines and are suitable for the provision of pharmacy services.

2.1 Essential and ongoing requirements

The Schedule to the Act sets out matters required in relation to registered premises such as layout, hygiene, temperature control and security and access.

Standards	
2.1.1	Registered premises shall comply with relevant requirements of the Schedule to the Act on an ongoing basis.
2.1.2	Scheduled poisons shall be stored, displayed and accessed in accordance with drugs and poisons legislation.

2.2 Alterations

Registered premises should be suitable for the provision of pharmacy services. By approving significant alterations to registered premises, the Authority can ensure that the premises remain suitable and do not present a risk to public safety. The Authority provides information regarding significant alterations in the Guidelines.

Standards	
2.2.1	Authority approval shall be obtained prior to making any significant alteration to registered premises.

2.3 Security

Registered premises shall be secure and safeguarded from unauthorised access.

Standards	
2.3.1	The doors, windows, skylights, walls and ceilings of a registered premises shall be substantially constructed and secure to prevent unauthorised access.
2.3.2	There shall be adequate perimeter security measures in place which prevents and deters unauthorised access.
2.3.3	The registered premises shall be fitted with a functional, 24-hour monitored intrusion detector alarm which:
a)	is monitored by an appropriately graded monitoring centre or an onsite security service approved by the Authority in special circumstances; and
b)	covers all areas where medicines are kept.

2.4 Design, layout and condition

Standards	
2.4.1	The dispensary shall be a private area, dedicated to tasks associated with the dispensing, supply and compounding of medicines and secure storage of medicines and patient records.
2.4.2	The dispensary shall be fitted with:
a)	a sink with integrated drainer, that is supplied with hot and cold running water and connected to an appropriate waste disposal system;
b)	refrigeration which is dedicated to and appropriate for the storage of medicines;
c)	an appropriate number of suitably equipped dispensing stations;
d)	sufficient free working space and area/s for equipment storage and use;
e)	a storage system which provides for the safe custody and accurate selection of medicines;
f)	a dedicated storage facility for the storage of Schedule 8 and Schedule 9 poisons which complies with legislation and facilitates their accurate selection.
2.4.3	The dispensary shall be well lit, adequately ventilated and temperature controlled, to maintain the integrity of medicines and provide for personal comfort.
2.4.4	There shall be hygiene and infection prevention measures in place which are appropriate for the pharmacy services being provided.

3. Equipment and references

3.1 Equipment

Principle

Equipment that is fit for purpose, clean, routinely maintained and operated in a safe manner enables the delivery of pharmacy services consistent with good pharmacy practice and public safety.

Standards	
3.1.1	Equipment shall be fit for purpose and undergo regular maintenance, including routine calibration or servicing.
3.1.2	Equipment shall be operated safely, in accordance with standard operating procedures, and within the manufacturer's specified operating range.
3.1.3	Equipment shall be routinely cleaned and stored appropriately, in a hygienic location, when not in use.
3.1.4	Maintenance records shall be kept and standard operating procedures shall be current and readily available.
3.1.5	Registered premises shall be equipped with the minimum equipment required for simple compounding.

3.2 References

Principle

Current editions of references, relevant legislation and other reliable, up-to-date information related to pharmacy practice are essential for the delivery of pharmacy services.

Standards	
3.2.1	Registered premises shall be equipped with range of current references relevant to the pharmacy services provided.

4. Records

Principle

Records, when created, documented, and stored appropriately, maintain the confidentiality and security of the record, follow good pharmacy practice and are consistent with public safety.

Standards	
4.1	Records relating to pharmacy services shall be created, stored and retained in accordance with relevant legislation and good pharmacy practice.
4.2	Records containing patients personal and health information shall be secure from theft, misuse, interference, loss, unauthorised access, modification or disclosure.
4.3	Records for medicines and poisons shall comply with the requirements under the drugs and poisons legislation.
4.4	Records of Schedule 8 and Schedule 9 poisons shall be reconciled, at least quarterly, against actual balance and appropriate records maintained.

5. Policies and procedures

Principle

Policies and procedures are an important element of governance arrangements which are developed, maintained and made available to pharmacy staff to ensure that pharmacy services comply with relevant legislation and good pharmacy practice.

Standards	
5.1	There shall be policies and procedures in place which are relevant to the services provided and activities being undertaken at the registered premises.
5.2	Policies and procedures shall be clearly documented, readily accessible, regularly reviewed and updated as part of effective governance arrangements.

6. Specialised services

Principle

The delivery of specialised services in accordance with relevant legislation, applicable practice standards and good pharmacy practice ensures the safety of pharmacy staff and the public.

Note: This standard is not an exhaustive list of specialised services. Consideration shall be given to emerging services and changes in professional practices, as described and updated in the Guidelines.

6.1 Complex compounding

Complex compounding, including aseptic compounding, shall be undertaken in appropriate premises, with appropriate equipment, to ensure safety to operators and the public, and to prevent the physical, chemical and microbiological contamination of the product.

Standards	
6.1.1	The premises and working environments shall be safe and suitable for the compounding activities being undertaken.
6.1.2	Complex compounding shall be undertaken in accordance with relevant legislation and good pharmacy practice.
6.1.3	Equipment shall be fit for purpose, protect product quality and prevent cross-contamination. A risk-based approach shall be used by licensees to justify the selection and installation or use of equipment.
6.1.4	Equipment shall be routinely and effectively cleaned and maintained.
6.1.5	The appropriate equipment shall be used for the manipulation and compounding of hazardous materials such that exposure to the staff, the public and the environment is minimised and the integrity of product is maintained.
6.1.6	The handling, storage and disposal of materials, including those which pose an occupational health and safety hazard, shall follow relevant legislation and appropriate guidelines.

6.2 Medication assisted treatment for opioid dependence (MATOD)

Note: also referred to as Opioid replacement therapy or Maintenance pharmacotherapy for opioid dependence.

Standards	
6.2.1	The delivery of services for medication assisted treatment for opioid dependence shall be in accordance with relevant legislation, regulations and policies issued by the Victorian Department of Health and good pharmacy practice.

6.3 Dose Administration Aids

Standards	
6.3.1	The delivery of services in relation to dose administration aids shall be in accordance with relevant legislation and good pharmacy practice, and shall have regard to the guidelines issued by the Pharmacy Board of Australia and practice standards issued by the Pharmaceutical Society of Australia.

6.4 Administration of medicines by injection

Under the Drugs and Poisons legislation, Schedule 4 poisons can be approved for administration by a pharmacist, under certain conditions. Pharmacists will need to complete specific training and register with the Department of Health.

Standards	
6.4.1	The delivery of services in relation to the administration of medicines by injections shall be in accordance with relevant legislation, regulations and guidelines issued by the Victorian Department of Health and good pharmacy practice.

6.5 Emerging services

As pharmacy practice evolves, specialised services will emerge and professional practices may change. These will be updated in the Guidelines and shall be read in conjunction with this standard.

Standards	
6.5.1	The delivery of specialised services, as described in the Guidelines, shall be in accordance with relevant legislation and good pharmacy practice.

7. Quality improvement and risk management

Principle

An effective quality improvement and risk management system, continuously improves pharmacy practice and ensures the delivery of pharmacy services that are consistent with public safety.

Standards	
7.1	There shall be a system in place which appropriately monitors and reviews the safety and quality of pharmacy services as part of ongoing improvement activities.
7.2	There shall be a system in place which appropriately identifies, investigates and monitors incidents, adverse events and near misses.
7.3	There shall be a system in place which appropriately identifies and manages the risks associated with providing pharmacy services.

Appendix A: Consultation questionnaire

This consultation questionnaire is available for completion as an online survey. Click on the following link to complete the questionnaire,

https://forms.office.com/r/Pz3At1FUyb

The consultation period will close at **5.00 p.m. on Friday 30 July 2021**.

You may wish to refer to a copy of the questionnaire provided below to assist in the preparation of your response for submission via the online survey.

Consultation on the draft Victorian Pharmacy Authority Standards

The Victorian Pharmacy Authority is seeking feedback on draft standards relating to the mandatory requirements for the operation of pharmacies, pharmacy businesses, pharmacy departments and pharmacy depots.

The purpose of the consultation is to ensure that the draft Standards are clear, easy to understand and capable of being met.

The consultation questionnaire is set out in three sections:
- Section A contains identifier questions;
- Section B contains questions relating to the 'Introduction and interpretation' section of the draft Standards; and
- Section C contains questions relating to the Standards and includes opportunity for more detailed feedback to be provided.

If you experience any difficulty with the completion of this survey please contact admin@pharmconsult.com.au for assistance.

Section A

Identification questions.

Please be advised that the information collected in this form will remain confidential and will be used solely for the purpose of collating feedback on the VPA draft Standards. All data will be deidentified and will not be disclosed to any third party. This information will be held securely and will be disposed of in accordance with VPA policy, once it is no longer required.

1. Please provide your name

2. Please provide your email address

3. Please select the option which best applies to you?

☐ Licensee

☐ Pharmacist regularly and usually in charge

☐ Community Pharmacist

☐ Hospital Pharmacist

☐ Representative of a Peak body

☐ Other, please provide details below

4. If you are responding on behalf of an organisation, please provide the name of the organisation and your position within the organisation.

Section B

The 'Introduction and interpretation' section of the Standards is intended to set the context for the Standards, and to make it clear to whom the Standards apply and how they apply to pharmacy businesses, departments or depots.

5. Is the *'Scope and application of the Standards'* clear and easy to understand?
   ☐ Yes
   ☐ No

6. Are the steps the Authority may take if the Standards are not met, clearly described?
   ☐ Yes
   ☐ No

7. Are there additional terms that should be defined in the *Key terms*?
   ☐ Yes
   ☐ No

8. If you answered yes to the question above, please provide details of terms and definitions you would propose be added.

9. Is there additional information that should be included in the 'Introduction and interpretation' section?
   ☐ Yes
   ☐ No

10. If you answered yes to the question above, please provide your suggestions or comments below.

Section C

The Standards have been designed to provide clarity for licensees and stakeholders on the mandatory requirements under the Act and reflect the responsibilities and obligations in relation to good pharmacy practice. The Standards are supported by the Guidelines, which represent the Authority's current policies.

11. Using the scale below, please indicate the extent to which the Standards in the ***Licensee Responsibilities*** category are clear and easy to understand.

	Very unclear	Somewhat unclear	Mostly clear	Very Clear
Standard 1.1	○	○	○	○
Standard 1.2	○	○	○	○

12. Using the scale below, please indicate the extent to which the Standards in the ***Premises*** category are clear and easy to understand.

	Very unclear	Somewhat unclear	Mostly clear	Very Clear
Standard 2.1	○	○	○	○
Standard 2.2	○	○	○	○
Standard 2.3	○	○	○	○
Standard 2.4	○	○	○	○

13. Using the scale below, please indicate the extent to which the Standards in the ***Equipment and References*** category are clear and easy to understand.

	Very unclear	Somewhat unclear	Mostly clear	Very Clear
Standard 3.1	○	○	○	○
Standard 3.2	○	○	○	○

14. Using the scale below, please indicate the extent to which the Standards in the ***Records*** category are clear and easy to understand.

	Very unclear	Somewhat unclear	Mostly clear	Very Clear
Standard 4.1	○	○	○	○
Standard 4.2	○	○	○	○
Standard 4.3	○	○	○	○
Standard 4.4	○	○	○	○

15. Using the scale below, please indicate the extent to which the Standards in the ***Policies and Procedures*** category are clear and easy to understand.

	Very unclear	Somewhat unclear	Mostly clear	Very Clear
Standard 5.1	○	○	○	○
Standard 5.2	○	○	○	○

16. Using the scale below, please indicate the extent to which the Standards in the ***Specialised Services*** category are clear and easy to understand

	Very unclear	Somewhat unclear	Mostly clear	Very Clear
Standard 6.1	○	○	○	○
Standard 6.2	○	○	○	○
Standard 6.3	○	○	○	○
Standard 6.4	○	○	○	○
Standard 6.5	○	○	○	○

17. Using the scale below, please indicate the extent to which the Standards in the ***Quality Improvement and Risk Management*** category are clear and easy to understand.

	Very unclear	Somewhat unclear	Mostly clear	Very Clear
Standard 7.1	○	○	○	○
Standard 7.2	○	○	○	○
Standard 7.3	○	○	○	○

18. If you would like to provide further comment or suggest changes to improve the clarity of specific Standards please do so in the space below:

19. Are the requirements and responsibilities of the Standards in the ***Licensee Responsibilities*** category, capable of being met?

	Yes	No
Standard 1.1	○	○
Standard 1.2	○	○

20. Are the requirements and responsibilities of the Standards in the ***Premises*** category, capable of being met?

	Yes	No
Standard 2.1	○	○
Standard 2.2	○	○
Standard 2.3	○	○
Standard 2.4	○	○

21. Are the requirements and responsibilities of the Standards in the ***Equipment and References*** category, capable of being met?

	Yes	No
Standard 3.1	○	○
Standard 3.2	○	○

22. Are the requirements and responsibilities of the Standards in the ***Records*** category, capable of being met?

	Yes	No
Standard 4.1	○	○
Standard 4.2	○	○
Standard 4.3	○	○
Standard 4.4	○	○

23. Are the requirements and responsibilities of the Standards in the ***Policies and Procedures*** category, capable of being met?

	Yes	No
Standard 5.1	○	○
Standard 5.2	○	○

24. Are the requirements and responsibilities of the Standards in the ***Specialised Services*** category, capable of being met?

	Yes	No
Standard 6.1	○	○
Standard 6.2	○	○
Standard 6.3	○	○
Standard 6.4	○	○
Standard 6.5	○	○

25. Are the requirements and responsibilities of the Standards in the ***Quality Improvement and Risk Management*** category, capable of being met?

	Yes	No
Standard 7.1	○	○
Standard 7.2	○	○
Standard 7.3	○	○

26. If you feel that any of the Standards are not capable of being met, please elaborate further in the space below:

27. Will the Standards have any additional impact on licensees, pharmacists or members of the public?

☐ Yes

☐ No

28. If you answered yes to the question above, please provide details in the space below:

29. Are there other Guidelines that you believe should be elevated to Standards?

VPA Guidelines can be accessed here:
https://www.pharmacy.vic.gov.au/cms_files/VPA%20Guidelines%20effective%201%20November%202019.pdf

☐ Yes

☐ No

30. If you answered yes to the question above, please provide details in the space below:

31. If you have any further comments or feedback on the Standards please provide details in the space below: