

Victorian Pharmacy Authority Statement of Expectations ACTION PLAN: 1 July 2019 to 30 June 2021

The table below outlines the Victorian Pharmacy Authority's Statement of Expectations Action Plan 1 July 2019 to 30 June 2021.

Performance Improvement	Action	Performance Target
<p>Timeliness</p> <p>Continue to implement recommendations of the <i>PharmConsult</i> Review of pharmacy business licence application and renewal processes including a program of risk-based audits of pharmacy business ownership and commercial arrangements.¹</p>	<ul style="list-style-type: none"> • Undertake pharmacy ownership audits. • Undertake pharmacy financial audits. 	<ul style="list-style-type: none"> • Undertake 100 pharmacy ownership audits annually. • Undertake 10 pharmacy financial audits annually.
<p>Timeliness</p> <p>Identify further improvements to application processes to improve efficiency of regulatory practice and reduce regulatory burden for regulated entities.</p>	<ul style="list-style-type: none"> • Transition application forms to electronic formats. • Further develop existing application service standards into a more comprehensive Service Charter outlining the Authority's service commitment. • Send approval letters and licence/registration certificates to applicants by email at the time of issue. • Seek stakeholder feedback on application forms, application processes and service standards. 	<ul style="list-style-type: none"> • Transition 50% of licence/registration application forms to electronic formats by 30 June 2021. • Develop a Service Charter for publication on the Authority's website by 31 December 2019. • Commence routinely sending approval letters and licence/registration certificates to applicants by email at the time of issue by 30 June 2020. • Host a stakeholder forum on application processes and service standards by 31 December 2019.

¹ PharmConsult reviewed the Authority's licence application processes in 2017. Its recommendations included the introduction of a program of risk-based audits of pharmacy businesses which the Authority commenced in 2018. The program includes an ownership audit undertaken by officers of the Authority and, in selected cases, a financial review undertaken by a leading accounting firm on behalf of the Authority to ensure compliance with the Act.

Performance Improvement	Action	Performance Target
<p>Risk-based strategies</p> <p>Enhance the Authority's existing pharmacy premises inspection and pharmacy business ownership audit programs to ensure these continue to be risk-based and outcome-focussed and better enable the Authority to target regulatory intervention to improve compliance.</p>	<ul style="list-style-type: none"> • Seek feedback from stakeholder organisations, such as the Pharmacy Board of Australia, pharmacy peak body organisations and Medicines and Poisons Regulation Branch, on the risk-based focus of the Authority's inspection program. • Introduce a declaration by licensees at renewal time of compliance in high-risk areas. • Modify the program of pharmacy business ownership audits to clearly differentiate the audit phase from any resulting investigations into pharmacy business ownership or commercial arrangements. This will facilitate publication of audit outcomes to promote compliance with the ownership provisions in the Act. 	<ul style="list-style-type: none"> • Feedback will be sought from stakeholder organisations on the risk-based focus of the Authority's inspection program by 30 June 2020. Any resulting changes to the inspection program will then be communicated to stakeholders. • Renewal applications will include a declaration of compliance in high-risk areas commencing with 2020 renewals (by 30 June 2020). • The Authority's pharmacy business audit program will include a clearly differentiated audit phase and post-audit investigation phase by 31 December 2019.
<p>Compliance related assistance and advice</p> <p>Revise existing compliance related assistance to aid compliance with pharmacy legislation and guidelines by licensees and other pharmacists.</p>	<ul style="list-style-type: none"> • Review and revise the Authority's self-audit form to ensure it is an effective tool to aid compliance by licensees and other pharmacists with pharmacy legislation and guidelines. • Provide current relevant guidance to licensees following inspections. 	<ul style="list-style-type: none"> • The self-audit form will be reviewed and revised for publication on the Authority's website by 30 June 2020. • Inspection-related guidance documentation will be reviewed and revised by 31 December 2019 with a view to expanding the range of guidance provided.

Performance Improvement	Action	Performance Target
	<ul style="list-style-type: none">• In consultation with Medicines and Poisons Regulation Branch and pharmacy peak bodies, develop a compliance and awareness aid for the management of Schedule 8 poisons in pharmacies, recognising existing levels of non-compliance and the significant risks to public safety.	<ul style="list-style-type: none">• A compliance and awareness aid for the management of Schedule 8 poisons in pharmacies will be developed in consultation with stakeholders, published and distributed to pharmacy premises by 30 June 2020.