Communiqué
No. 6 - 20 July 2018

This communiqué is issued by the Victorian Pharmacy Authority (the “Authority”) to inform stakeholders about the Authority’s regulatory activities.

The Authority met on 18 July 2018 at the Authority offices.

New Authority members

The Governor in Council appointed three new Authority members from 1 July 2018 until 30 June 2021.

David McConville BPharm MPS AACPA
Authority Chairperson and pharmacist member David McConville graduated from the Victorian College of Pharmacy in 1990 and is a partner in a community pharmacy in Balwyn North. Specialty areas of pharmacy of interest to David include Pharmacotherapy, Pain management and Aged Care. David is a member of the Clinical Advisory Committee for the Area 4 Pharmacotherapy Network and is a foundation member of the Victorian Clinical Council, established to advise and provide guidance to the State government and health agencies to provide safer, better care to all Victorians.

Marie Ritchie GradCertBA, MAICD, HonMemPDL
Community member Marie Ritchie worked for Pharmaceutical Defence Limited (PDL) until 30th December 2016. She was the CEO and Company Secretary from 2009. She was also the Company Secretary of Australian Pharmaceutical Publishing Co Ltd (APPco). Marie worked for these two companies for over 22 years. Marie currently is the Acting Chair of the Kooweerup Regional Health Service (KRHS). She joined the KRHS Board in July 2016.

Brendon Moar BPharm MPS
Pharmacist member Brendon Moar is a proprietor and pharmacist in charge of Corner Amcal Bairnsdale, Board member of Bairnsdale Regional Health Service, and member of the East Gippsland Primary Health Care Network’s Clinical Advisory Committee. Brendon has been a community pharmacist in East Gippsland for 12 years with great interest in integrated healthcare, indigenous and public health, and health literacy in regional communities. He has a keen interest in risk management within the health care setting, and pharmacy regulation, having previously been a member of the Pharmacy Board of Australia’s Notifications Committee.

The Authority sincerely thanks Toni Riley for her leadership as Chairperson over the last three years. At its meeting the Authority acknowledged her valuable contribution to the work of the Authority as Chair and as a pharmacist member since 2012. The Authority also thanks Richard Mullaly and Robert Jamieson for their contributions as community member and pharmacist member respectively over the last three years.
Pilot pharmacy business audit – preliminary findings

In 2017 PharmConsult Pty Ltd examined the Authority’s licensing program. PharmConsult’s report recommended that the Authority implement a risk-based pharmacy business audit program.

The Authority commenced implementation of a pilot program in April 2018 and intends to introduce a more extensive audit program by 31 December 2018.

Pilot program method

Twelve pharmacy businesses were selected for a pilot audit. They were selected randomly from groups of pharmacies with different risk factors.

Each of the twelve were to be subject to an ‘ownership audit’, that is, an audit to determine if their pharmacy ownership arrangements comply with the ownership and undue influence provisions of the Pharmacy Regulation Act 2010.

Additionally, two of the twelve were selected to be subject to a financial audit, that is, an audit of the pharmacy financial records to confirm their stated ownership arrangements and to ensure that there are no undeclared or unlawful arrangements in place. Any of the other ten businesses may also be subject to a financial audit if their ownership audit proves to be inconclusive.

The licensees of the pharmacies selected were required to complete an Audit Questionnaire and to lodge copies of nominated documents including any partnership agreement, lease or title, franchise agreement, service agreement, licence issued by a third party, finance agreement, trust deed. They were required to make a statutory declaration attesting to the completeness and truthfulness of their audit return. Licensees who are required to lodge financial records will be required to do so only after the ownership audit has been completed.

Report at 30 June 2018

<table>
<thead>
<tr>
<th>Ownership audit returns received.</th>
<th>Ownership audits completed &amp; satisfactory</th>
<th>Ownership audits in progress.</th>
<th>Financial audit returns received</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>6</td>
<td>6 – in these cases further documentation or information has been sought.</td>
<td>Nil requested to date.</td>
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Quarterly performance report

The Authority’s performance measurement framework provides information on its activities and intended outcomes.

The quarterly performance report for the period 1 April 2018 to 30 June 2018 is now available on the VPA website here.

Based on statistics from inspections carried out during the period, inspectors will focus on the following areas in coming months:

- Adequacy of references
- Routine barcode scanning
- Reconciliation of S8 stocks and records
- Appropriate storage and display of Schedule 3 products including pseudoephedrine (see below for related information)
- Secure storage of S8 safe keys
Security alert – pseudoephedrine

Victoria Police has issued an alert about the theft from pharmacies of medicines containing pseudoephedrine. Over three days from 26 to 29 June 2018, three south-eastern suburban pharmacies were broken into. In two cases, the glass doors were smashed and in the other, the front window. Break-ins may occur in other areas. This is a timely reminder for all pharmacy owners to review their procedures and security measures.

The police advise:

• Consider fitting laminated glass. This can be retro-fitted.
• Try not to cover too much of the front window and doors with signs as they hinder natural surveillance by the public.
• Make sure alarm systems and CCTV are functioning and are regularly checked.
• Minimise stocks of pseudoephedrine.
• Other security measures include alarms that immediately emit a “dry fog” when the sensor detects the presence of intruders. A dense fog is released immediately. [Pharmacists considering such a system should seek expert advice on suitability for their premises]

This advice supplements the Authority’s general security requirements and to keep all medicines that contain pseudoephedrine out of sight of the public.

Prevention tips and a Do-It-Yourself Business Security Assessment can be obtained from the Victoria Police website here.

Pseudoephedrine is used as a precursor in the illicit manufacture of amphetamines. Pharmacists should treat all requests for pseudoephedrine cautiously and avoid drawing purchaser’s attention to storage areas. Further guidance is available in the Pharmacy Board of Australia’s Guidelines on Practice-Specific Issues.

Panel hearings

There were two panel hearings in June 2018 into allegations that licensees had failed to meet their responsibilities to comply with the Pharmacy Regulation Act 2010 and/or good pharmacy practice at registered premises.

Case 1

There was a failure to ensure that the records of all transactions in Schedule 8 poisons show the true and accurate balance of each Schedule 8 poison remaining after each transaction, and failure to ensure that the records of all transactions in respect of methadone or buprenorphine were made at least daily.

The licensees were cautioned.

Case 2

In this case the owner failed to ensure that medicines are not re-used after dispensing and after they have left the pharmacy in that patients’ dispensed medicines were used to fill other dose administration aids for other patients. This is a requirement of the Schedule to the Pharmacy Regulation Act 2010.
Calculated and actual balances of opioid replacement therapies were not reconciled regularly, the mandatory sedation warning label was not routinely applied to dose administration aids where indicated, and there were not adequate arrangements to ensure that client information could not be obtained from discarded documents.

The owner was cautioned.

David McConville
Chair