



10 February 2021

Devika Mudaliar  
Skills Engagement Executive, Skills IQ  
Level 1, 332 Kent Street  
Sydney NSW 2000

Dear Hospital/Health Services Pharmacy Technical Advisory Committee,

**RE: SkillsIQ Draft 2 of Certificate III and Certificate IV in Hospital/Health Services Pharmacy Support qualifications**

The Society of Hospital Pharmacists of Australia is the national professional organisation for more than 5,000 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is committed to facilitating the safe and effective use of medicines, which is the core business of pharmacists, especially in hospitals.

SHPA welcomes the opportunity to provide feedback to the Skills IQ consultation on Draft 2 of the Hospital Pharmacy Training Package Products – Certificate III and IV in Hospital/Health Services Pharmacy Support. This consultation has been informed by SHPA members through SHPA's Speciality Practice groups. We offer this feedback in addition to the valuable information our representatives have provided on the TAC and IRC committees.

SHPA was pleased to see some of the member feedback provided in our submission to Draft 1 of the Certificate III and Certificate IV in Hospital/Health Services Pharmacy Support qualifications, included in Draft 2. However, SHPA would like to reinforce some of the key points identified by members in our previous submission, for further consideration by the TAC in the finalisation of the curriculum for hospital pharmacy Technicians and Assistants. SHPA has aimed to collate these in the recommendations below.

**SHPA Recommendations:**

- 1. Compounding knowledge must be embedded as part of an existing core unit of both the Certificate III and Certificate IV qualifications, such as HLTPHA012 'Dispense prescriptions and medication orders to better describe the applicable outcome', to ensure a basic understanding of ordering, issuing and labelling of compounded products and an appreciation of the manufacturing process.**

As noted in our previous submission, many SHPA members consider compounding of aseptic products (i.e. parenteral feeding solutions and cytotoxic drugs) as a routine activity undertaken by Technicians and Assistants most of the time in their workplace. Compounding of pharmaceutical products (i.e. topical creams/ointments and oral solutions) is also considered a common activity for Technicians and Assistants working in hospitals across Australia.

Members of both the SHPA Speciality Practice Leadership and Management Leadership Committee, and the Technicians and Assistants Leadership Committee, are in agreement that an understanding of compounding from both manufacturing and procurement perspectives is necessary, even to those who do not undertake this activity. Most sites who do not compound their own pharmaceutical products, will purchase externally compounded ones.

It is becoming common practice for regional, rural and remote patients to seek to have their cancer treatment locally at their regional hospital, and so every hospital pharmacy team needs to have an understanding of safe handling of medical products that have been compounded for individualised dosing, whether locally or via an external compounder. It is imperative therefore, that pharmacy Technicians and Assistants completing either of these qualifications, have a basic understanding of



**The Society of Hospital Pharmacists of Australia**

PO Box 1774 Collingwood Victoria 3066 Australia

(03) 9486 0177 | shpa.org.au | shpa@shpa.org.au | ABN: 54 004 553 806



ordering, issuing and labelling of compounded products in the hospital setting, and an appreciation of the manufacturing process in order to safely support the pivot to individualised therapy.

SHPA believes this compounding knowledge can be incorporated as a 'performance criteria' in the HLTPHA012 'Dispense prescriptions and medication orders to better describe the applicable outcome' unit. This will ensure that all learners undertaking either qualification, will be equipped with the essential compounding knowledge necessary to handle manufactured products in the hospital. SHPA is aware that there are three elective units in Group A of Certificate IV that provide learners with an opportunity to complete a Compounding Specialisation however, a basic understanding of the process is essential for all learners to acquire, even those who only complete Certificate III due to the high level of safety and complexity involved.

- 2. As an application of relevant Certificate IV elective units, learners should be expected to demonstrate competency for completing certain expanded scope activities that are currently being undertaken by Hospital Pharmacy Technicians and will support future Pharmacy Technician roles.**

Tech-check-tech is an example of an activity undertaken by many pharmacy Technicians in Victoria, Queensland and in South Australia, to support pharmacists and increase their capacity to perform more clinical tasks. Responsibilities such as these are growing more common and a greater focus is placed on a range of ward-based administrative, supply, technical and cognitive activities under the supervision of a pharmacist, and supported by groups such as the Victorian Technician Role Expansion and Collaboration. It is therefore important, to consider whether progress towards advanced activities such as Tech-Check-Tech, can be included as elective units in the Certificate IV qualification, as a means of future proofing the qualifications. SHPA expects that activities such as Tech-check-tech will continue to expand and may in future need to be incorporated as core units in Certificate IV.

- 3. Standardised terminology should be used to describe the specific functions undertaken by Technicians and Assistants when dealing with medications. That is, rather than 'dispensing' which can be interpreted as many various functions, more specific terms such as 'administration of medications', 'preparation for supply of medications' or 'supply of medications' are encouraged to be used.**

The *Victorian Drugs and Poisons legislation* has recently moved away from using the term 'dispense' and SHPA members believe more standardised terminology would prevent confusion regarding supply versus administration of a medication.

SHPA members are excited by the improvements made to Draft 2 of the Certificate III and Certificate IV in Hospital/Health Services Pharmacy Support qualifications. We provide this feedback in order to ensure the expertise of the profession is on record in support of this endeavour. Pharmacists and pharmacy Technicians and Assistants working as a team in the delivery of clinical pharmacy services will increase the capacity of Pharmacists to deliver clinical services to individual patients.

If you have any queries or would like to discuss our submission further, please do not hesitate to contact Johanna de Wever, General Manager, Advocacy and Leadership on [jdewever@shpa.org.au](mailto:jdewever@shpa.org.au).

Yours sincerely,

A handwritten signature in black ink that reads 'Kristin Michaels'.

Kristin Michaels  
Chief Executive



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