ABN 54 004 553 806



28 May 2013

guidelinesconsultation@ahpra.gov.au

Re: Consultation on common codes and guidelines

SHPA welcomes the opportunity to comment AHPRA's draft and revised documents:

- Guidelines for advertising
- Code of conduct
- Social media policy
- Guidelines for mandatory notifications

As SHPA provided comments as part of the preliminary consultation have already expressed our support for each of the documents and noted that our members have not provided us with any specific information regarding how the current *Code of conduct* or *Guidelines for mandatory notifications* are working. As we have previously provided comments on earlier drafts we do not have extensive comments regarding this version of documents but make the following additional observations.

Guidelines for advertising

We believe that the guidelines for testimonials and advertising need to cover both the services and **products** offered as part of a particular service or exclusive to a particular service.

Code of conduct

Several registered professions could be involved in the prescribing, compounding, supply and administration of compounded products (e.g. medical, nursing, pharmacy, optometry and physiotherapy). We believe that the code should address the prescribing, compounding, supply and administration of agents that are not approved or intended for human therapeutic use, specifically: ingredients that are not BP or USP standard, or specifically labelled as 'not intended for human use' or 'for use in animals' and investigational medicines. SHPA suggests that as a minimum an additional item should be added to the section regarding informed consent:

g. where a practitioner undertakes to prescribe, compound, supply or administer a product for a patient or client (e.g. a compounded medicine), informing the patient or client if the product contains an ingredient that is not approved or intended for human therapeutic use.

Should you wish to clarify or discuss the content of this correspondence, please don't hesitate to contact me via email (<u>shpa@shpa.org.au</u>) or on telephone 03 9486 0177.

Yours sincerely,

Helen Dowling Chief Executive Officer (BPharm,DipHospPharmAdmin,GDipQIHCare,FSHP,AICD)

The Society of Hospital Pharmacists of Australia