



## **The Pharmacy Guild of Australia**

The Pharmacy Guild of Australia is a not for profit association. Established in 1928, the Guild is registered under the federal Workplace Relations Act 1996 as an employers' organisation. Its members are owners of some 5,050 pharmacies throughout Australia. Approximately 15,000 pharmacists and 34,000 other employees work in Guild member pharmacies. With its network of over 5000 pharmacies in urban, regional and rural communities throughout Australia and its highly trained workforce, community pharmacy is the most accessible of all health services and is well-placed to play a constructive and dynamic role in the provision of effective primary health care.

The Guild is also a Registered Training Organisation with registration to delivery training in all states and territories in Australia. The Guild currently delivers the Certificate II, III and IV in Community Pharmacy and in 2010 delivered over 1700 qualifications to pharmacy and dispensary assistants around Australia. As well as its accredited training delivery the Guild also provides pharmacists, pharmacy and dispensary assistants and interns with a suite of professional education programs.

## **Recommendations**

The report *A Shared Responsibility: Apprenticeships for the 21<sup>st</sup> Century* presents a set of 14 recommendations based on the findings of the Expert Panel. The Pharmacy Guild has undertaken a review of these recommendations and provides the following comments as part of the consultation process.

### **Recommendation 1 – Establish a National Custodian to oversee reform**

The Pharmacy Guild of Australia would welcome reform of the current apprenticeship/traineeship system as feedback from our industry indicates dissatisfaction with the current system. Pharmacies find the apprenticeship/traineeship difficult to manage with a range of layers and structures that are difficult to navigate. Many pharmacies find the administrative burden of the current system overwhelming and abandon the enrolment and training of employers due the large number of organisations they have to deal with when attempting to train their staff.

The Guild believes that a national custodian needs to not place an additional layer or level to the current system but in fact reduce the number of organisations that pharmacies need to deal with and documentation that needs to be completed prior to, during and on the completion of training.

### **Recommendation 2 – Clarification of roles and consolidation of stakeholders**

The Pharmacy Guild of Australia believes that clarification of roles and consolidation of stakeholders could assist pharmacies in understanding the framework that makes up the current apprenticeship/traineeship system. During the course of a typical traineeship a pharmacy would be required to contact or communicate with over five different organisations/bodies including the Australian Apprenticeship Centre, Group Training organisations, state government departments and the Registered Training Organisation. A consolidation of these stakeholders would assist pharmacies navigate the apprenticeship/traineeship system and encourage them to enrol employers in training.

### **Recommendation 3 – Establish a formal accreditation process for the pre-qualification and training of all employers**

The Guild currently undertakes a comprehensive induction and mentoring of employers and associated staff when they enrol a trainee. This induction process includes face-to-face meetings which outline the

responsibilities of all parties, the training and assessment process and the learning resources provided. We strongly believe that this induction/mentoring process is key to our success and the success of our learners. The Guild would support the establishment of pre-qualification and training of employers as long as it was recognised that there would be associated costs to this process.

#### **Recommendation 4 – Establish structure support for employers**

The Pharmacy Guild of Australia believes that the support and assistance that is provided to employers during the traineeship is a key contributor to the success of the learner. Employers find the training process confusing and struggle to understand many of the concepts and requirements of competency based training. Further support and assistance for employers can only assist in the contributing to the success of the learner.

#### **Recommendation 6 – Establishing an Employer Contribution Scheme**

The Pharmacy Guild of Australia would need further detail on a proposed Employer Contribution Scheme before providing comment on this recommendation. The Guild believes that the current contribution by employers in time, resources and financial contribution is significant and would be concerned that any further contribution would deter employers from enrolling their employees in training.

#### **Recommendation 7 – Continuation of training and employment during periods of economic downturn**

The Pharmacy Guild of Australia would support the continuation of training during periods of economic downturn. However, it needs to be recognised that as owners of small businesses, pharmacies can be affected by economic downturn. Pharmacies need the flexibility to manage it staffing levels to ensure the overall success of the business. The Guild would provide any assistance required to learners or employers to continue training opportunities during economic downturn.

#### **Recommendation 8 – Regulate the quality of VET in Schools**

The Pharmacy Guild of Australia would strongly support the regulation of VET in Schools Program. As a provider of training for the VET in Schools the Guild has been witness to a range of programs. Whilst many programs are extremely thorough with the school or RTO providing comprehensive training and assessment services there are many schools/RTOs that provide substandard training which has little application to the workplace.

#### **Recommendation 9 – Increase national consistency in preparatory training**

As per the previous recommendation the Guild has seen a range of preparatory training courses offered by RTOs and other organisations. Learners who complete a comprehensive preparatory program achieve positive outcomes both in work and during training so the quality of these programs is critical. Therefore, the Guild would support increased national consistency.

#### **Recommendation 10 – Provide additional support for apprentices and trainees who face specific challenges**

The Pharmacy Guild of Australia would support the provision of additional support for apprentices and trainees who face specific challenges. The Guild encourages enrolments from Indigenous Australians through its Aboriginal and Torres Strait Islander Pharmacy Assistant Traineeship Scheme. With pharmacies located in almost every rural and remote town in Australia, the Guild also believes that additional support to these pharmacies and learners would be valuable.

#### **Recommendation 11 – Raise the status of apprenticeships and traineeships**

The Pharmacy Guild of Australia would support any actions to raise the status of apprenticeships and traineeships in Australia. The Guild believes that the value of traineeships and apprenticeships is not recognised by both employers and potential employees and therefore it is under-utilised by both.

**Recommendation 12 – Promote a culture of competency based progress in apprenticeships and traineeships**

The Pharmacy Guild of Australia recognises that competency based training is a key tenet of traineeships. Competency based progression is a key component of the training and assessment systems that the Guild employs with its learners and therefore would support this recommendation.

**Recommendation 13 – Improve the implementation of Recognition of Prior Learning and Recognition of Current Competence**

Recognition of Prior Learning (RPL) is fundamental to training and assessment services offered by the Pharmacy Guild of Australia. RPL is offered to all learners prior to and during the training process with considerable numbers of learners using this recognition system. The Guild would welcome the improvement to RPL and RCC implementation and would also request that there is improved consistency with the assessment of learners.

**Recommendation 14 – Review of apprenticeships and traineeships provisions, wages and conditions by Fair Work Australia**

The Pharmacy Guild of Australia would require additional information regarding the terms of this review before it would be able to provide comment on this recommendation.

**Recommendation 5 – Redirect current Australian Government employer incentives to provide structured support services to eligible apprentices and trainees**

The Pharmacy Guild of Australia has serious concerns regarding Recommendation 5 and as a provider of training in the retail sector believes that this recommendation would have a significant impact on our industry. The Guild believes that some of the information provided in this report is inaccurate and would like to provide additional information to support the value of traineeships to the pharmacy industry.

There appears to be the misconception that completion rates for the retail industry provide the government with little return on investment. Whilst completion rates as reported by NCVET for the retail sector as a whole appear to be low the Guild is able to demonstrate that completion rates in the Certificate II, III and IV in Community Pharmacy are very positive. For example, of the 1700 learners enrolled in training in 2009 over 70% will successfully complete their qualification. This completion level clearly demonstrates that learners are successfully completing their training, employers are gaining employees who are skilled and knowledgeable and government is receiving return on its investment in training.

The Guild is deeply concerned that incentives be provided to 'eligible apprentices and trainees' as we believe that current tools and indicators used by governments to determine employment/training needs is inaccurate. The Priority Occupations Test which is based on the Skills Occupation List criteria from Skills Australia does not clearly reflect the pharmacy industry's employment needs. Usually these lists or indicators are based, in part, on job advertisements.

Whilst the Guild does not have quantitative data, anecdotal information suggests that pharmacists are not advertising for qualified pharmacy and dispensary as they believe that it is unlikely that they will fill the position with a qualified staff member. The Guild does not believe that current indicators used by the government reflect the true nature of the industry. And to remove funding incentives from an industry which we believe has a lack of skilled and qualified employees available would be short-sighted.

Incentive payments are a key component of the traineeship program and are valued by the pharmacy industry. This is particularly the case in rural and remote areas of Australia. The role of pharmacy, and therefore pharmacy and dispensary assistants, in providing access to health care is particularly important in rural and remote areas, where the health of people living in those communities is of a lesser standard than that of people living in metropolitan areas. Poor access to health services is cited as being one of the major causes of this inequality.

As a key provider of health care services pharmacy plays a critical role in providing customers with medicines and health advice to assist them in achieving and maintaining good health. Pharmacy is the most accessible of all the health providers and as such pharmacy and dispensary assistants need well developed skills and knowledge which is provided by the Community Pharmacy qualifications.

The Community Pharmacy qualifications list over 80 units of competency and are considered one of the most rigorous traineeship programs. For example, the Certificate II contains 26 units of competency which span includes competencies in key health areas, medicines and healthcare information. The financial incentives provided by the government are critical to assisting that these small businesses ensure that pharmacy staff have the skills and knowledge to assist customers achieve good health. Data included in the report indicated that the average Certificate II in Retail is completed in around two months. This is certainly not the case with Community Pharmacy with the majority of learners requiring twelve months or more to complete a Certificate II in Community Pharmacy. Once again, this reflects the return on investment that the government is receiving from the provision of incentives to this industry.

Pharmacy is a key employer of individuals who face specific challenges. The three key areas where pharmacy draws its employment base from include women, young people and those located in rural and remote areas of Australia. Our sample of our learner data indicates that over 95% of learners enrolled in Guild accredited training are women, with 74% aged between 16-25 and more than 60% located in rural areas of Australia. In many small towns, the local pharmacy is seen as a key employer and contributor to local programs.

Incentive payments provide pharmacies with the opportunity to value-add to the programs that are developed. The Guild can provide examples additional services including small group networks and face-to-face training sessions. These additional services would only be possible with the support that is provided through incentive payments. These payments are also used by pharmacies to address the training needs of other pharmacy staff that are not eligible for funded training with the pharmacy diverting these funds to pay for fee-for-service training that is offered by the Guild and other RTOs.

The removal of incentive payments to the pharmacy industry would impact significantly upon the many pharmacies that access and value this system. The incentives in no way reimburse the employer for the time, resources and financial cost that are incurred when a pharmacist employs and trains a staff member. However, this incentive does allow the pharmacist and the Pharmacy Guild of Australia, as the Registered Training Organisation, to ensure that the training and support that the learner receives provides them with the best opportunity for success.

The Pharmacy Guild of Australia welcomes the work completed by the Expert Panel in its report *A Shared Responsibility: Apprenticeships for the 21<sup>st</sup> Century*. We believe that many of the recommendations made by the Expert Panel have merit and their implementation should be considered. However we request that the government seek further data and opinion when considering the implementation of these recommendations, in particular Recommendation 5. The Pharmacy Guild of Australia would be pleased to provide further information, data and opinion to assist in the outcomes of this review.

For further information please contact:

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