

20 May 2025

Australian Health Practitioner Regulation Agency
GPO Box 9958
Brisbane
QLD 4001

Sent via email to: NPCFreview@ahpra.gov.au

Re: National Prescribing Competencies Framework

Thank you for the opportunity to contribute to the review of the *National Prescribing Competencies Framework – Embedding quality use of medicines into practice* (second edition) (the framework).

As the Public Advocate for Queensland, I undertake systemic advocacy to promote and protect the rights and interests of Queensland adults with impaired decision-making ability.¹ There are several conditions that may affect a person's decision-making ability, including intellectual disability, acquired brain injury, mental illness, neurological disorders (such as dementia) or alcohol and drug misuse.

A framework that is contemporary and reflects current and emerging trends in education and multi-profession practices is a welcome initiative. I congratulate the Australian Health Practitioner Regulation Agency (AHPRA) in taking this important step towards improving national prescribing practices and I support an update to the Framework as proposed by option two of the *Review of the National Prescribing Competencies Framework* public consultation paper.

I am confident that the framework's strong emphasis on the importance of adopting a person-centred approach to prescribing, that empowers a person to actively participate in decisions about their treatment, will yield positive outcomes.

I am also pleased to see the focus on supporting people to participate in these decisions. This is particularly important for people with impaired decision-making ability who may need targeted supports to make informed decisions about their healthcare. Accordingly, AHPRA may wish to consider including guidance on supported decision-making in the framework. Supported decision-making refers to 'processes and approaches that assist people to make a decision, including by giving them the tools they need to make the decision for themselves.'²

Incorporating guidance on supported decision-making in the framework would align with recommendations from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (the Royal Commission), which addressed the ways in which supported decision-making should be further entrenched in legislation, policy and practice to promote and protect the rights of people with a disability. The relevant recommendations range from the provision of information and education on supported decision-making to families of people with a disability,³ through to the creation of practice guidance for service providers,⁴ and several proposed legislative reforms.⁵

¹ *Guardianship and Administration Act 2000* (Qld) s 209.

² Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, "Executive Summary, Our vision for an inclusive Australia and Recommendations", 2023, p. 328.

³ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, "Executive Summary, Our vision for an inclusive Australia and Recommendations", 2023, recommendation 6.13, p. 222.

⁴ *Ibid*, recommendation 10.7, p. 288.

⁵ *Ibid*, recommendation 6.6, p. 217, and recommendation 10.6, p. 288.

Including clear supported decision-making guidance for all prescribers in a national framework would not only be consistent with formal recommendations from the Royal Commission; it would contribute to the 'uniformity and consistency in practice across states and territories' that was proposed by the Royal Commission in its final report.⁶

Conclusion

Thank you again for the opportunity to comment on the framework.

Should you wish to discuss any of the matters I have raised in this submission further, please do not hesitate to contact my office via email public.advocate@justice.qld.gov.au or phone 07 3738 9513.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Chesterman', with a long horizontal flourish extending to the right.

John Chesterman (Dr)
Public Advocate

⁶ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, "Executive Summary, Our vision for an inclusive Australia and Recommendations", 2023, p. 71.