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**Pharmacy Board
Ahpra**

Pharmacist Capability Framework

Preliminary Consultation Stakeholder
Feedback Report

23 September 2025

Acknowledgement of Country

We gratefully acknowledge the Ngunnawal people, the traditional owners of the land on which the APC is based. We pay our respects to the Ngunnawal people and recognise their deep connection to this incredible place we now share. We also pay our respects to the resilience, strength and wisdom of Aboriginal and Torres Strait Islander Elders, past, present and emerging across the nation.

We recognise First Nations people's vast knowledge in native plants and their uses. Indigenous Australians were our first pharmacists. Country has provided medicines and healing throughout history. We acknowledge this important connection to Country and the impacts colonisation continues to have on this integral practice.

Canberra means meeting place in Ngunnawal, and is a place where people have been meeting, living and learning for thousands of years. We hope to continue this tradition as we work toward our vision of collaborative, committed and safe pharmacy practice.

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Preliminary Consultation Feedback Report

The Australian Pharmacy Council (APC) would like to express our sincere thanks to the individuals, groups and organisations who provided feedback during the preliminary consultation phase of the development of the Pharmacist Capability Framework. We appreciate and value your input which will play a vital role in refining and strengthening the draft framework to ensure it meets the needs of the profession.

This report outlines the development process of the Pharmacist Capability Framework and summarises the consultation and engagement activities undertaken during the preliminary consultation to inform the draft Framework.

Background

The Pharmacy Board of Australia (the Board) has [engaged APC to develop a Pharmacist Capability Framework](#) on their behalf. It will be used by APC for accreditation purposes, and by the Pharmacy Board for its regulatory functions including registering pharmacists.

The Board's Pharmacist Capability Framework ('the Framework') will describe the entry-to-practice capabilities of a newly registered pharmacist who is adaptable to future practice change. The Framework will support the Board's registration functions and the APC's accreditation functions, by:

- underpinning the next version of the accreditation standards developed by APC to accredit pharmacy programs that lead to qualifications suitable for registration in the pharmacy profession
- supporting the initial training, assessment and registration of pharmacists who qualified in Australia or overseas. The Frameworks will also outline the expected minimum requirement for performance at entry to the profession and at re-entry, after a period of absence from practice.

Project Objective

The goal of this project is to develop the Framework that will describe the entry-to-practice capabilities of a newly registered pharmacist and underpin the future education of pharmacists, ensuring they can adapt to a changing environment.

What we have done so far

There are six stages to the development of the Framework:

1. Project initiation
2. Literature Review and Preliminary consultation preparation
3. Preliminary consultation
4. Public consultation
5. Reviewing the draft Framework
6. Finalisation and approval

The first three stages of the process have now been completed.

Consultation Approach

The consultation approach aligns with [Ahpra's Consultation process of National Boards 2023](#) and [Guidance on developing professional capabilities](#) as follows:



Image: Australian Health Practitioner Regulation Agency. (2025). [Guidance on Developing Professional Capabilities](#)

As outlined in the abovementioned guidance, the consultation approach was designed in two distinct phases to ensure a structured, inclusive and iterative process: a preliminary consultation phase and public consultation phase.

Preliminary Consultation

The preliminary consultation focused on targeted engagement with the project Reference Group (subject matter experts for the project) and key stakeholders. This phase was intended to gather in-depth feedback and test the draft Framework with key stakeholders and refine them before public consultation. It also provided an opportunity for feedback about the consultation materials' form, expression and/or clarity. The preliminary consultation phase included a face-to-face consultation forum with the Reference Group (RG) and meetings with targeted stakeholders. Preliminary consultation was undertaken between June to August 2025 and has now concluded.

Public Consultation

The public consultation phase is open to a wider audience, including health professionals, consumers, and interested parties. This phase is designed to gather a wide range of perspectives on the draft Framework, allow broad participation and promote transparency in our development process. A range of feedback opportunities are provided through face-to-face and virtual forums, written submissions and other engagement channels. The public consultation will be undertaken in November and December 2025, with preparations now underway.

Consultation Documents

The first part of our consultation process was supported by the following documents:

- Preliminary Consultation paper (including consultation questions)
- Literature review
- Draft Pharmacist Capability Framework
- Framework Mapping

Ways to provide feedback

During the preliminary consultation period, feedback was gathered through a range of targeted engagement methods to ensure meaningful input from key stakeholders.

Members of the Reference Group were invited to provide feedback in two main ways:

- By attending and contributing to discussions at a face-to-face preliminary consultation forum held in August
- By submitting a written response addressing the consultation questions.

In addition to the work of the Reference Group, a series of meetings with targeted stakeholders were undertaken during this period. These meetings were held with selected organisations and representatives of the pharmacy profession in each state and territory.

Consultation Outcomes

The preliminary consultation forum was undertaken in Melbourne in August. It was structured around eight preliminary consultation questions designed to gather targeted feedback from fifteen RG members. The RG includes representatives from professional organisations who were nominated by their respective organisation, as well as individual representatives with specific experience and expertise across areas related to the deliverables of this project. The individual representatives were recruited through an Expression of Interest (EOI) process that was undertaken in February to March 2025.

The RG members represent the following organisations or roles:

- Aboriginal and Torres Strait Islander persons
- Advanced Pharmacy Australia
- Consumers
- Council of Pharmacy Schools
- National Australian Pharmacy Students' Association (NAPSA)
- Pharmaceutical Society of Australia
- Pharmacists in patient facing roles – community and hospital
- Pharmacy Board of Australia
- Pharmacy Guild of Australia
- Professional Pharmacists Australia
- Representative from another health profession

Evaluation of Responses

During the preliminary consultation 289 pieces of feedback were received, analysed and categorised.

All feedback was carefully grouped to the relevant preliminary consultation questions allowing for a detailed understanding of themes, gaps and recommendations raised by the stakeholders. Feedback was categorised thematically and analysed, resulting in four key themes: content, cultural safety, implementation and structure.

The table below describes the distribution of feedback across the four key themes, as well as providing data on the actions taken by APC. Some feedback resulted in changes to the draft Framework, and others were 'for noting'.

Feedback received Total = 289			
Actioned 44%	Percentage	Noted (no action required) 56%	Percentage
Content	23%	Content	24%
Cultural safety	5%	Cultural safety	3%
Implementation	1%	Implementation	12%
Structure	16%	Structure	16%

Positive sentiment was reflected strongly in the feedback, with 80% of the noted (no action required) comments expressing support, contributing to an overall positivity of 44% across all feedback.

Feedback in response to consultation questions

The following tables summarise the responses to the draft Pharmacist Capability Framework received during the preliminary consultation phase. They are grouped according to each of the relevant consultation questions.

The tables also describe 'what APC did in response to the feedback received' and how that has influenced the revised version of the draft Framework for public consultation.

Question 1	
Does the draft Framework describe the future focused capabilities of an entry-to-practice pharmacist adaptable to a changing practice?	
Comments	What APC did in response to feedback received
<p>General consensus is that the draft Framework describes the future-focused capabilities for entry-level pharmacists who are adaptable to a changing healthcare environment.</p> <p>The key reasons provided include:</p> <ul style="list-style-type: none"> It addresses emerging roles such as compounding, prescribing, the expanding scopes of practice and digital health 	<p>APC acknowledges the positive feedback, noting no specific action required.</p>

Question 1

Does the draft Framework describe the future focused capabilities of an entry-to-practice pharmacist adaptable to a changing practice?

Comments	What APC did in response to feedback received
<ul style="list-style-type: none"> Lack of specificity in the structure of the Framework is good for adaptability, describing generic skills helps with the currently disjointed roles that are location specific 	
<p>How can the Framework be applied across various levels of pharmacy education and career stages?</p>	<p>The following information has been added to the draft Framework:</p> <p><i>“The draft Framework does not describe or mandate the educational design, program types or AQF levels that are required to train graduates to meet the Capability Framework. The APC Accreditation Standards for Pharmacy Programs (to be reviewed in 2025-26) describe and are used to assess and accredit programs by APC and approve programs by the Board. The Accreditation Standards (which are outcomes focused and allow flexibility in program design) and TEQSA requirements apply to education providers delivering accredited programs.”</i></p>

Question 2

Is the content and structure of the draft Framework clear and relevant?

Comments	What APC did in response to feedback received
<p>The following comments were generally in agreement with the content and structure of the draft Framework:</p> <ul style="list-style-type: none"> Overall, the group found the content and structure to be clear and relevant The lack of specificity is good for adaptability and the content not focusing on the tasks helps to achieves this. The draft Framework is a step towards helping to build professional identity. 	<p>APC acknowledges the positive feedback, noting no specific action required.</p>
<p>Improve the formatting to ensure clear segmentation of the different sections and include numbering.</p>	<p>Visible lines separating the indicators have been enhanced throughout the Framework. Numbering has not been included to allow for ease of changes between the draft versions, it will be included in the final Framework.</p>

Question 3

Is there any overall content in the draft Framework that needs to be changed, removed or added?

Comments	What APC did in response to feedback received
<p>Expand on the background, purpose and context of the Framework, clarify how it fits in the profession and define its intended audience.</p> <p>Clarity on how the Framework will fit within the pharmacy sector and how it will align with other documents needs to be improved.</p>	<p>Significant detail has been added in draft version of the Framework for public consultation, introductory and contextual sections to provide clearer guidance on its purpose, audience, scope of practice and acknowledgement of professional standards, workplace settings, and different roles. This will help establish the foundation of the Framework and strengthen understanding of the capabilities.</p>
<p>Improve the Framework through integrating any missing concepts, using inclusive language, making unclear language or terms more explicit, and removing any duplication.</p>	<p>Changes made to specific content including adding the 'Glossary' that was previously only available in the Literature Review document.</p> <p>The terms identified in the consultation have been added to the Glossary within the Framework.</p>
<p>The group suggested that the number of domains could be reduced, and the segmentation be removed.</p>	<p>The draft Framework has been revised from six to five capability domains:</p> <ul style="list-style-type: none"> • Medicines Expert • Collaborator • Health Advocate • Health Professional • Leader and Communicator
<p>The order of the sub-domains and the indicators were discussed, and suggestions were made to revise.</p>	<p>The draft Framework has been revised; the order of the sub-domains has been changed and moved accordingly. The sequencing of the indicators within each sub-domain has also been revised to improve flow and order.</p>

Question 4

Do you have any feedback on the six Domains in the draft Framework?

Comments	What APC did in response to feedback received
<p>General feedback across the six domains and suggestions to improve or to incorporate across the indicators, including the following (<i>including but not limited to and in no particular order</i>):</p> <ul style="list-style-type: none"> • Clinical governance • Vaccination • Deprescribing • Quality improvement • Research 	<p>Content changes have been made through the draft Framework.</p>
<p>Examine the use of several non-measurable verbs in the indicators, across all six domains.</p>	<p>APC reviewed the active verbs and reworded as appropriate.</p>

Question 4

Do you have any feedback on the six Domains in the draft Framework?

Comments	What APC did in response to feedback received
Ensure inclusion of reference to key pharmacy documents.	A new section has been added to the draft Framework entitled Acknowledgement of professional standards, workplace settings, and different roles, to ensure key documents are referred to and how they align with the draft Framework is described.

Question 5

Do you have any other general comments or feedback about the draft Pharmacist Capability Framework?

Comments	What APC did in response to feedback received
Expand on the purpose and context of the Framework, clarify how it fits in the profession and define its intended audience.	The draft Framework has been revised and now includes comprehensive information regarding the purpose of the Framework, how it fits in the profession and scope of practice and assumptions. These changes are important and reflect refinements to both the organisation and clarity of the Framework.
Review examples in the Capability Indicators in brackets to ensure they are relevant.	APC reviewed the examples and removed as appropriate.
Balance specificity with broader applicability, ensuring the framework is tailored to the diverse needs and contexts of its intended audience.	The draft Framework has been revised to ensure balance.

Question 6

Would the draft Framework result in any potential negative or unintended consequences to Aboriginal and Torres Strait Islander Peoples?

Comments	What APC actioned
Ensure the language and terms used in the Framework are accurate and acknowledge the diverse histories, cultures, and experiences of Aboriginal and Torres Strait Islander Peoples. Remove language or terms that are specific to a particular Aboriginal nation or language group.	The Framework has been reviewed for accuracy of terms. The term 'Dadirri' has been removed from the Framework.

Question 6

Would the draft Framework result in any potential negative or unintended consequences to Aboriginal and Torres Strait Islander Peoples?

Comments	What APC actioned
Ensure the Framework reflects a strengths-based approach.	The Framework has been reviewed to ensure that a strengths-based is used throughout especially when referencing Aboriginal and Torres Strait Islander Peoples.
Unless explicitly addressed, considerations relating to Aboriginal and Torres Strait Islander Peoples are often inadvertently omitted. Suggested integrating cultural safety throughout all aspects of the Framework.	The Framework is designed to be inclusive and universally applicable. While explicit inclusion can carry powerful symbolic and practical value, there was careful consideration to avoid tokenism and to ensure alignment with similar Frameworks in the National Scheme. As a result, the Framework takes an integrated approach, where principles of cultural safety, equity, and respect for Aboriginal and Torres Strait Islander Peoples are embedded throughout. Additionally, cultural safety is also explicitly recognised through a dedicated subdomain to affirms its significance as a core capability. In addition, minor changes such as 'respecting Indigenous data sovereignty' have been included.

Question 7

Are there any other regulatory impacts that we should be aware of from this consultation?

Comments	What APC actioned
It was agreed that the Framework will have no additional regulatory impacts beyond what is already outlined in the paper that needs to be highlighted to the Board.	The Framework has been revised and now includes comprehensive information of the purpose of the Framework, how it fits in the profession and scope and assumptions.
Reflections on possible positive impacts that were discussed in the consultation were as follows: <ul style="list-style-type: none"> the Framework helps to provide national expectations on entry-to-practice capabilities for pharmacists the Framework will help to promote consistency across education and hopefully, moving forward, pharmacists could do same things across jurisdiction 	APC acknowledges the feedback, noting no specific action required, however more information about scope of practice and assumptions have now been included in the Framework.

Question 8

Are there any implementation issues the Board should be aware of for the final Framework?

Comments	What APC actioned
<p>Include education providers and the profession when planning the implementation and transition plan.</p> <p>The group also highlighted that the transition to the new Framework should be timed in a way that it considers accreditation cycles and university timelines and available resources to implement changes.</p>	<p>An implementation plan will be shared with the stakeholders with an adequate transition timeline. This plan will be in consultation with key stakeholders and in consideration of program providers' timelines and resources.</p> <p>A transition period for the implementation of the Framework will be agreed and shared prior to implementation. This means that the accreditation of pharmacy programs and the initial training, assessment and registration of pharmacists who qualify in Australia or overseas will continue to be supported by the existing standards until the new frameworks are implemented.</p>
<p>Considerations on how elements of the Framework can be implemented consistently across Australia. The points raised were:</p> <ul style="list-style-type: none"> • Cultural awareness/safety • Racism/discrimination • How to determine if someone is being racist or discriminatory • How to train the next generation about the above 	<p>Noted and these will be taken into consideration for the development of the implementation plan.</p>
<p>Clearly communicating any new requirements and implementation and transition plan for the Framework. Tailored communication for different stakeholders including:</p> <ul style="list-style-type: none"> • Education providers • Pharmacists • Different stakeholders • Consumers • Public 	<p>APC and the Board will ensure clear communication on the implementation of the Framework is provided.</p>
<p>Provide a mapping document of changes.</p>	<p>APC will take this into consideration when planning the implementation of the Framework.</p>
<p>Timing of the Assessment Framework to support implementation.</p>	<p>The implementation plan of the Assessment Framework will be shared with stakeholders as soon as practicable.</p>

The Next Steps

The next step in the Framework development process is gathering feedback on the draft Framework from a wider audience including health professionals, consumers, and interested parties to ensure it is clear, contemporary, and fit for purpose. Input will be gathered through multiple mechanisms as part of the public consultation phase.

APC will convene four face-to-face and virtual public consultation forums. To ensure a wide range of groups and individuals are able to contribute via the forums, the meetings will be hosted in selected cities across Australia. The public forum dates and locations are:

Date	Forum	Location
Wednesday 5 November 2025	Forum 1	The Business Centre, Collins Square, Melbourne
Wednesday 12 November 2025	Forum 2	Stamford Grand, Adelaide
Monday 17 November 2025	Forum 3	Brisbane Airport Conference Centre, Brisbane
Wednesday 19 November 2025	Forum 4	Virtual

An online form for written submissions will be open from 3 November to 15 December 2025.

APC has prepared a version of the draft Framework based on feedback from the preliminary consultation and will release the revised draft and the public consultation materials in early November. Public consultation feedback will be considered in the revision of the draft. The final draft will be presented to the Board for their approval.