



AN RIALTÓIR CÓGAISÍOCHTA
THE PHARMACY REGULATOR

PSI Report of the Public Consultation on the Draft Patient Charter

March 2016

1. Introduction

The Pharmaceutical Society of Ireland (PSI) has developed a Patient Charter to better inform the public on what they can expect from their community pharmacist. The aim of the Patient Charter is to:

- Demonstrate the role that pharmacists play in assisting patients to look after their own or someone else's health, such as medicines management, healthcare advice, vaccinations and blood pressure checks.
- Inform patients about how they can help their pharmacist to meet these expectations, such as providing up-to-date prescriptions, asking questions if they don't understand something and giving complete information about their medical history and any medicines they are taking.
- Raise awareness of the PSI as the pharmacy regulator, which includes a responsibility for handling complaints made against pharmacists and pharmacies.

The draft Charter was reviewed by the National Adult Literacy Agency (NALA) before the consultation to ensure that the information and language used would be accessible to the majority of readers. Following consultation, changes to the Charter were reviewed again by NALA and the Patient Charter leaflet attained the 'Plain English' mark.

1.1. About the Consultation

A public consultation on the draft Patient Charter (Appendix 1) was held over a three-week period from the 2nd of December 2015 until the 23rd of December 2015. The draft Patient Charter was made available on the PSI website along with a link to a short online questionnaire. The option of sending comments in writing, via letter or email was also provided.

Emails were sent to all PSI registrants and to a range of PSI stakeholders including patient groups, advocates, other regulators and health service providers inviting comments to the consultation.

The survey consisted of 15 questions divided into four sections. The sections were further divided into themes based on content, promoting awareness, format and distribution and finally the demographic information of the survey participants.

1.2. Response to the Consultation

A total of 88 responses to the public consultation on the draft Patient Charter were received. Of

those 88 responses, 78 respondents used the online survey and 10 responses were received by email. Not all respondents provided their feedback to each of the survey questions. Responses to the quantitative questions in the online survey have been analysed and presented in table format throughout the proceeding document. A summary of the general comments and feedback received, including by email, have been included.

A profile of the respondents is presented below with further information in Section 2.4.

Respondents who provided their names or PSI registration numbers are listed in Appendix A.

<i>Of the 88 responses to the survey, 83 people answered this question.</i>	
Community/Hospital pharmacist	48
Pharmacist working in another area	11
Other	8
Member of patient/public advocacy organisation	6
Member of the pharmacy team	5
Patient/member of the public	3
Health or social care professional	2
Total	83

1.3. About this Report

This report summarises feedback received during the public consultation. It was not possible to include all responses in this report, however all comments have been taken into account and the Patient Charter has been revised and amended as appropriate. This report addresses and responds to key themes that emerged from the public consultation and provides rationale for any changes that resulted, or did not result, in changes made to the Patient Charter after consultation.

The PSI would like to thank all those who took the time to provide submissions to the consultation.

2. Results

Section 1 of the Survey-What can I expect from my pharmacist?

The first section of the draft Patient Charter outlined what patients can expect when treatment and care is provided in a pharmacy. This was listed under seven themes: Safe and effective services, Communication and information, Participation, Dignity and respect, Privacy, Accessibility and Accountability. Questions were asked in relation to this.

Question 1. Do you think that these themes and the associated information capture the main points that patients will find useful?

<i>Of the 76 responses to this question, 89.5% agreed that the themes and information capture the main points that patients will find useful.</i>		
	No. of responses	% responses
Yes	68	89.5%
No	8	10.5%

Question 2. Is there anything else that you would like to see included under this section of the Patient Charter?

40 people provided comments under this heading, and these have been broken down into common themes below.

The most common concern among respondents was the sentence ‘your pharmacist will make sure your medicines are safe for you’. It was felt that a pharmacist could not give absolute assurance in this regard. While a pharmacist can weigh up benefits and risks, there can be no absolute guarantee of safety.

There was also commentary with regard to the sentence that ‘the pharmacy should be safe and clean’ and whether this was necessary to be captured as part of a Patient Charter.

Some respondents felt that information regarding prescription medicines should be included in the Patient Charter as there is no reference to prescribed medicines which is the main role of most pharmacists and a main reason the public uses pharmacy services. Similarly, it was also commented

that the Charter may represent the domains of a professional practice of a pharmacist in a very simplistic fashion and should be expanded to reflect the wider role of a pharmacist, greater extent of services offered from a pharmacy, as well as include reference to the wider pharmacy team.

There was also commentary on the role of pharmacists in reviewing and reconciling patients' medications on a regular basis and that this should be included. Some comments indicated that the Charter did not adequately describe the trusting, personal and empathetic relationship between the pharmacist and their patients or explain the role of a pharmacist adequately enough/to its fullest extent.

Comments were also made about the interactions pharmacists have with other healthcare professionals and that a large amount of time is spent engaging with healthcare professionals on behalf of patients and this should be reflected in the Charter.

It was commented that the Charter should reflect information on cost of medicines, transparency in pricing, that patients should receive value for money and the fact that the pharmacist may ask patients if they already have sufficient quantities of a medicine. Respondents also commented that the Charter should include information on the patient's compliance and adherence with their medication.

It was highlighted that communication, information and privacy are critically linked and that patient privacy should be paramount when seeking advice on medicines and healthcare queries from a pharmacist. It was also suggested that clear guidance should be provided in the Charter around the legal aspects of patients accessing their records.

Other comments indicated that pharmacists should treat patients in a non-judgemental way and this should be adequately reflected in the Charter.

Respondents commented that some aspects of the Charter would not apply to a hospital setting and therefore may cause confusion for patients.

PSI Response

The PSI has given due consideration to the many matters addressed in this feedback. Many changes have been made to reflect these, including expanding further on the role of pharmacists, the inclusion of the pharmacy team, the wider interaction with healthcare professionals and acknowledging the expanding service provided in some pharmacies. We have endeavoured to reflect as much as possible comments raised by respondents but some of the points raised fell outside the scope of the document. The Patient Charter provides a short and accessible overview that will be of use to pharmacy service users, and cannot address every aspect of the care, services and advice that may be provided from a pharmacy.

On review, it was decided to focus this Charter on the role of the community pharmacist and state this

more clearly, as people will more often have interaction with community pharmacy services. It was not felt that the Charter could adequately address the role of hospital pharmacists, where these are different, and that it could place unintended expectations in the delivery of hospital pharmacy services.

Section 2 of the Survey-How can I help my pharmacist meet these expectations?

The second section of the Patient Charter lets patients know what they can do to help their pharmacist give them the best care or advice. This was listed under six themes: Safe and effective services, Communication and information, Participation, Dignity and respect, Privacy and Accountability.

Question 3. Do you think that these themes and the associated information capture the main points that patients, pharmacists and the wider pharmacy team will find useful? <i>Of the 75 respondents who answered this question, 93% agreed that the themes and associated information capture the</i>		
	No. of responses	% responses
Yes	70	93%
No	5	3%

Question 4. Is there anything else you would like to see included under this section of the Patient Charter?

31 people provided comments under this heading, and these have been broken down into common themes below.

Overall comments received indicated that the information provided is well structured and came across as client centred and empowers patients to be in control of their health. It was also mentioned that the Charter will encourage clients to ask their pharmacist questions. Some concerns were raised by pharmacists as to whether there was a need to include this section but feedback received from patients and patient advocates welcomed this section.

It was commented that patients should be encouraged to tell their pharmacist if they have any allergies, if they have stopped taking any medicines or, if they have any literacy or communication difficulties that would have an impact on their care.

It was also highlighted by some respondents that patients should be made aware of the time that may be needed to dispense or make available medicines, where the pharmacist may need to contact

the prescriber, for example.

It was commented that patients should be encouraged to take responsibility for their own health with the help of a pharmacist and the wider pharmacy team and that the Charter would encourage patients to ask questions. Another respondent suggested that this section should include the patient having a duty not to be wasteful of healthcare resources and to discuss with their pharmacist if they are no longer taking medication.

PSI Response

The PSI has noted all comments and feedback with thanks and amended the Charter in light of the comments and feedback received. In light of additional comments received on the Charter, the PSI removed the headings from this section but maintained the themes and content with slight amendments to the text.

Section 3 of the Survey- What can I do if these expectations are not met?

The PSI is the statutory body with responsibility to deal with complaints made about a pharmacist or pharmacy, where the matter cannot be resolved at the pharmacy. The PSI has a duty to tell people that it is the appropriate body to which a complaint can be made.

Question 5. Do you think that this information is clearly communicated in the Patient Charter?

<i>Of the 76 respondents who answered this question, 85.5% said that the information is clearly communicated in the Patient Charter.</i>		
	No. of responses	% responses
Yes	65	85.5%
No	11	14.5%

25 people provided comments under this heading, and these have been broken down into common themes below.

Comments received acknowledged the role the PSI plays in the complaints process and welcomed that local resolution was encouraged first. It was commented that the Charter should be explicit in that issues should be raised first with the Supervising Pharmacist or the pharmacist in charge. It was

also commented that patients should be given sufficient detail of the responsibilities of a pharmacist. Some respondents indicated that they felt it was unnecessary for this section to be included in a Patient Charter.

PSI Response

The PSI has noted all comments and feedback with thanks and amended the Charter in light of the comments and feedback received. As the PSI is the statutory body with responsibility to deal with complaints made about a pharmacist or pharmacy, the PSI has a duty to tell people that it is the appropriate body to which a complaint can be made.

2.2 Promoting Awareness

Reflecting on the Patient Charter, please consider these questions.

Question 6. Do you think the Patient Charter adequately informs patients about what they can expect from pharmacy services in Ireland?

<i>Of the 73 responses to this question, 82% agreed that the Patient Charter adequately informs patients about what they can expect from pharmacy services in Ireland.</i>		
	No. of responses	% responses
Yes	60	82%
No	13	18%

16 people provided comments under this heading, and these have been broken down into common themes below.

Comments received under this section included that pharmacists are a source of reliable and accurate information for medicines and this should be expanded further in the Charter and the health promotion and health advocacy role should be expanded upon. It was also commented that the role a pharmacist plays in minor ailments should be expanded upon and also reference should be made to the sourcing of medicines.

It was commented that an assurance should be provided to patients that there must be a pharmacist onsite when the pharmacy is open, and that the pharmacist is easily and readily accessible.

It was also commented that the Charter should reflect other areas where pharmacists work and be explicit with regard to services that are provided in pharmacies.

Furthermore, it was also suggested that the Charter should encourage the patient to voice their positive experiences of pharmacists and pharmacy staff, either directly to the Pharmacy or, if appropriate, to the PSI.

PSI Response

The PSI has noted all comments and feedback with thanks and amended the Charter in light of the comments and feedback received. Some of the comments made were outside the scope of the Charter and could not be included as it is not possible for the Charter to cover every aspect of the patient – pharmacist relationship.

Question 7. Do you think the Patient Charter adequately informs patients about the role that a pharmacist can play in their healthcare?

<i>Of the 72 responses to this question, 73% agreed that the Patient Charter adequately informs patients about the role pharmacists can play in their healthcare.</i>		
	No. of responses	% responses
Yes	53	73%
No	19	27%

19 people provided comments under this heading, and these have been broken down into common themes below.

Comments received under this heading indicated the need to further define the role of a pharmacist as a source of professional advice, which is evidence based and that in pharmacy, as in any profession, that opinions and advice can differ. However, there must be reassurance that the advice proffered is in the best interest of the patient and reinforced by appropriate evidence.

PSI Response

The PSI has noted all comments and feedback with thanks and amended the Charter to further expand on the role of a pharmacist as a source of professional advice in light of the comments and feedback received.

Question 8. Do you think that providing patients with a greater understanding of the role of the pharmacist, and what they can expect in a pharmacy, will empower patients to actively look after their own health with the help of a pharmacist?

<i>Of the 69 responses to this question, 84% of respondents agreed that providing patients with a greater understanding of the role of a pharmacist will empower them to actively look after their own health.</i>		
	No. of responses	% responses
Yes	58	84%
No	11	16%

16 people provided comments under this heading, and these have been broken down into common themes below.

Comments received in relation to this section indicated that the information in the Charter will assist patients to better understand the pharmacist’s role, which may be a positive factor contributing to empowerment, which is also influenced by other variables. It was also noted that some patients, especially the most vulnerable, are not in a position to be empowered and need support. Other comments indicated that the attitude and approach of the pharmacist and its staff will also have an influence as to whether patients will be empowered to actively look after their health and they should be in a position to assist patients.

Other comments indicated that the Charter would need to be communicated effectively to patients to ensure patients are aware of the Charter.

PSI Response

The PSI has noted all comments and feedback with thanks and amended the Charter in light of the comments and feedback received. The PSI acknowledges that the Patient Charter on its own will not solely empower patients and that pharmacists and patients have a critical role to play in this regard. It is hoped that the Patient Charter will be a step forward to facilitate this. The PSI acknowledges that effective communication, availability and distribution of the Charter will be important.

Question 9. Do you think that providing patients with a greater understanding of the role of the pharmacist, and what they can expect in a pharmacy, will influence the quality of care and the services provided in pharmacies?

<i>Of the 70 responses to this question, 61% agreed that providing patients with a greater understanding of the role of the pharmacist will influence the quality of care and the services provided.</i>		
	No. of responses	% responses
Yes	43	61%
No	27	39%

19 people provided comments under this heading.

Comments received under this section were that the information in the Charter may influence the quality of care and services received by patients if the patient is given clear guidance as to the role of a pharmacist, which they can then refer to and use as a support. Other comments indicated that pharmacists must be proactive in addressing compliance issues in pharmacies and the Charter was

only one aspect of that and it was suggested that the launch of the Charter should coincide with stepped up efforts regarding compliance. It was also suggested that the Charter is an opportunity to engage with patients so as to ensure that there is an appropriate balance between a high quality, legal, safe and professional service with the informed demands of patients.

PSI Response

The PSI has noted all comments and feedback with thanks and amended the Charter in light of the comments and feedback received.

2.3 Format and Distribution

Question 10. Overall, did you find the draft Patient Charter clear and easy to read?

<i>Of the 70 responses to this question, 96% agreed that the Patient Charter was clear and easy to read.</i>		
	No. of responses	% responses
Yes	67	96%
No	3	4%

15 people provided comments under this heading, and these have been broken down into common themes below.

Comments made under this section indicated that the language was very clear and straightforward and that the Charter and the themes used provide an “at a glance” information leaflet for pharmacy service users in Ireland, in language that is suitable to the majority. It was commented that the document was well laid out and will be an accessible resource for patients.

Other comments indicated that it was unclear in the title what the Charter relates to and should include the word pharmacy and some commented that the Charter was quite long.

PSI Response

The PSI has noted all comments and feedback with thanks and amended the Charter in light of the comments and feedback received. The final published version of the Charter will have an engaging cover and clear titling to attract engagement with it.

Question 11. We would like to make the Patient Charter widely available in pharmacies, GP surgeries, libraries and citizen information centres, and on the PSI website. Do you think a patient leaflet is the most effective way to communicate the information provided in the Patient Charter?

<i>Of the 71 responses to this question, 82% of respondents agreed that a patient leaflet is the most effective way to communicate the information provided in the Patient Charter.</i>		
	No. of responses	% responses
Yes	58	82%
No	13	18%

31 people provided comments under this heading, and these have been broken down into common themes below.

Comments received under this section indicated that a poster format may also be useful to display in pharmacies and suggested that that the Charter should be provided in an editable format so pharmacies can personalise the Charter for their pharmacy. It was also commented that a leaflet is only part of a wider need for engagement with patients and patient empowerment and engagement needs to happen as part of wider education and support programmes.

It was suggested that a link or QR code would be a useful tool to include and that the Charter is also made accessible online.

PSI Response

The PSI has noted all comments and feedback with thanks. The Charter will be distributed via a leaflet and poster and will also be available to read on the PSI website and to download.

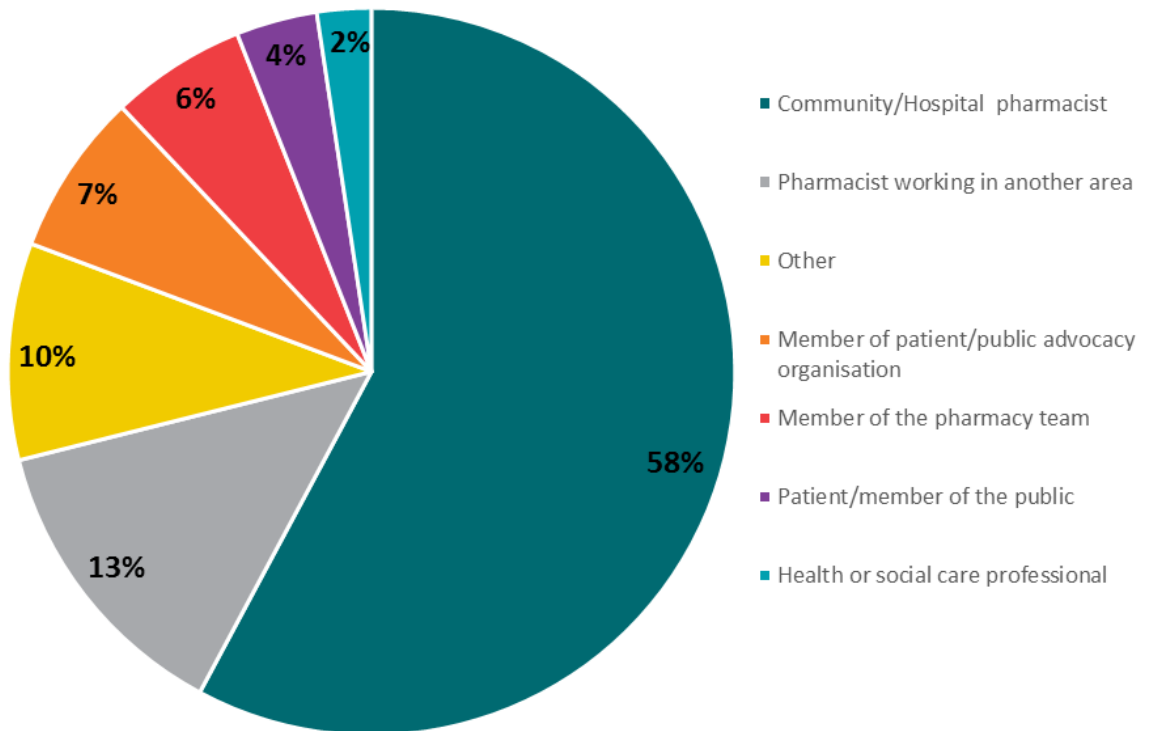
Question 12. Would you display the Patient Charter in your pharmacy/clinic/workplace?

<i>Of the 72 responses to this question, 72% said they would display the Patient Charter in their pharmacy/clinic/workplace.</i>		
	No. of responses	% responses
Yes	51	72%
No	6	8%
Not applicable	15	20%

2.4 Your Details

This section includes information gathered in questions 13-15 of the online survey and as indicated in email submissions.

Question 13: I am providing my feedback primarily as:



The majority of those who answered the survey were either a community or hospital pharmacist, or a pharmacist working in another area. Those that associate as ‘other’ gave their background as being with a regulatory body, government department, patient advocacy or older people’s organisation, and a qualified assistant.

Question 14: I am responding:

<i>Of the 88 responses to the survey, 83 people answered this question.</i>		
	No. of responses	% responses
Responding on my own behalf	67	81%
Responding as the authorised person on behalf of an organisation or group	16	19%

Contributing organisations and groups were:

- Chronic Pain Ireland
- County Wicklow Network for Older People
- Department of Health
- Health Products Regulatory Authority of Ireland
- Irish Heart Foundation
- Irish Institute of Pharmacy
- Irish Patient Association
- Irish Pharmacy Union
- Medical Council
- Mental Health Commission
- Multiple Sclerosis Society
- Nursing and Midwifery Board of Ireland
- Pharmaceutical Society of Ireland

Question 15. What is your age group?

	No. of responses	% responses
25 and under	3	4.23%
26-35	13	18.31%
36-45	24	33.80%
46-55	14	19.72%
56-65	16	22.54%
65+	1	1.41%
Total	71	100%

3. Next Steps

The PSI welcomed the number of responses received to this consultation, and noted that the majority of respondents felt that the Charter was clear and easy to read and that the themes are appropriate and useful signposts for patients.

The PSI acknowledges that the Patient Charter will better inform patients about what they can expect in their interaction with a pharmacist or pharmacy as well as highlight the role of pharmacists in providing healthcare. It also serves to raise awareness of the PSI as the pharmacy regulator.

The PSI, as the pharmacy regulator, acts to protect and promote the health, safety and wellbeing of

patients and the public. With this at the forefront, the PSI would like to make the Patient Charter widely available, for example, in pharmacies, GP surgeries, libraries, citizen information centres and on the PSI website. The PSI welcomes hearing from any organisations who would like to display or make available the Patient Charter.

The revised Patient Charter was approved by the PSI Council on 24 March 2016. This public consultation document was also approved by the Council for publication on the PSI website.

Appendix A

Respondents who provided their names as part of their submission to the consultation.

Name	Registration Number (if applicable) / Organisation
Marese Damery	Irish Heart Foundation
Rachel Gubbins	-
Pamela Logan	Irish Pharmacy Union
Deirdre Lynch	5273
Marie McConn	-
Margaret Murphy	-
Conor Phelan	4974
Eamonn Quinn	Department of Health
Richard Skyes	Saolta University Health Care Group
Philip Watt	Cystic Fibrosis Ireland

Appendix B

This is the text of the draft Patient Charter that was made available for comment during the public consultation in 2015.

Patient Charter

Pharmacists in your local community pharmacy, in hospitals or as part of specialist health services provide medicines and healthcare knowledge and services that have your health as their primary focus.

This Patient Charter tells you what you can expect from pharmacy services in Ireland and the role a pharmacist plays in your healthcare.

It also helps you understand the role that you play in looking after your own or someone else's health, with the help and support of your pharmacist.

What can I expect from my pharmacist?

Safe and effective services

- Your health, wellbeing and safety will be at the centre of your care.
- Following a consultation, your pharmacist will provide you with information about suitable medicines, other health products and services to meet your healthcare needs.
- Your pharmacist will provide you with care and treatment or may refer you to another healthcare professional.
- Your pharmacist will make sure your medicines are safe for you.

Communication and information

- Your pharmacist will listen to your questions and clearly explain all the information you need, so you can safely and properly use your medicines.
- Your pharmacist will give you clear information about the cost of medicines, other pharmacy services and health products.

Participation

- Your pharmacist will involve you in decisions about your treatment and care.
- You may refuse treatments that are offered to you. Your pharmacist will explain how refusing a treatment may affect your health.

Dignity and respect

- Your pharmacist will treat you in a sensitive and courteous way, which respects you and your beliefs.



Privacy

- Your pharmacist will respect your privacy. You can speak with your pharmacist in confidence, in a private consultation area.
- Your pharmacist will keep your personal records up-to-date and confidential. You may ask for a copy of your records from your pharmacist, if you wish.

Accessibility

- The pharmacy will be safe and clean, and will facilitate access to everyone.

Accountability

- Pharmacists and pharmacies must be registered with the Pharmaceutical Society of Ireland (PSI) and must operate legally, safely and ethically.
- You can expect to see the registration certificates of the pharmacy and the pharmacist in charge on display in the pharmacy.

How can I help my pharmacist meet these expectations?

Safe and effective services

- Give your pharmacist valid and up-to-date prescriptions.

Communication and information

- Give your pharmacist accurate and complete information about your medical history, any other medicines you take, and any other facts that may affect your healthcare.

Participation

- Take part in decisions about your care as much as you can. Ask questions if you do not understand something.

Dignity and respect

- Treat pharmacy staff with dignity and respect.

Privacy

- Respect the privacy of other patients.

Accountability

- Talk to your pharmacist if you have any concerns about the care you receive in the pharmacy.



What can I do if these expectations are not met?

Pharmacists are highly-qualified and trained healthcare professionals with the interests of patients and the public at the centre of their work. If you are unhappy with the service or care you have received in a pharmacy, you should speak first with the pharmacist at that pharmacy.

If this does not resolve the matter, and you are concerned about the behaviour, conduct or practice of a pharmacist, or the service you have received in a pharmacy, you may complain to the Pharmaceutical Society of Ireland (PSI), which will look into the matter.

You can find information about how to make a complaint on the PSI website, www.psi.ie, or you can phone the PSI on (01) 218 4000.

About the PSI

The Pharmaceutical Society of Ireland (PSI) has been set up by law to independently regulate pharmacists and pharmacies. We act in the public interest to protect and promote the health, safety and wellbeing of patients and the public.

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This is a draft document for public consultation. You can respond with your feedback using this online [public consultation survey](#).

