



# PSI response to HIQA stakeholder pre-consultation in the development of a Corporate Plan for 2016 – 2018

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## Introduction

This response is provided on behalf of the Pharmaceutical Society of Ireland (PSI), the pharmacy regulator. The PSI is an independent statutory body, established by the Pharmacy Act 2007. It is charged with, and is accountable for, the effective regulation of pharmacists and pharmacies, including responsibility for supervising compliance with the Act. The PSI regulates the profession in the interest of patient safety and public protection.

Functions of the PSI include registration of pharmacists, pharmaceutical assistants and pharmacies, inspection and enforcement, and the handling of complaints and disciplinary matters. The PSI also sets standards for education and training, accredits educational programmes, and works towards the development of pharmacy practice.

The PSI welcomes the opportunity to contribute, at this initial stage in the development of HIQA's corporate strategy for the period 2016 to 2018. As not all areas of the survey were within the PSI's remit, we have outlined some considerations in this submission, grouped under the key headings as provided in your online survey.

## Health Information

The PSI is supportive of the developments undertaken to date by HIQA in the furtherance of government eHealth strategy, to ensure the delivery of safe and efficient systems of care and support for those availing of health and social care services in Ireland.

Information and communication technologies have enormous potential to improve the quality, safety and efficiency of healthcare and the PSI is keen to support any further initiatives that will support healthcare professionals and provide real benefit to patients in terms of their treatment and care.

Of particular relevance at this juncture, is how the health service will make best and proper use of vital patient information. The PSI is supportive of a uniform system of shared access to patient information amongst healthcare professionals. Pharmacists and pharmacy staff

provide an important, easily accessible service within the healthcare system, and there would be significant patient benefits from a shared information flow that would allow, at each point of the patient's care pathway, the provision of the most appropriate treatment and advice, whether that care and treatment takes place in a pharmacy, GP surgery, hospital etc. In addition, the roll-out of a system of individual health identifiers would facilitate the availability, at the point of care, of accurate, up-to-date and verifiable information critical to health outcomes and safety and also greatly benefit patient ownership of their health information and further patient engagement with their treatment. It is vital that patients are involved in making informed decisions about their healthcare at every opportunity and this can only be fully realised through the accessibility of patient information for healthcare professionals and patients themselves.

In this context, it would be useful to consider, with a range of stakeholders, existing legislative provisions that currently prevent implementation of some of the proposed developments such as ePrescribing and individual health identifiers, so that further progress can be made to maximise patient safety and enable a unified service. The PSI is happy to engage with HIQA on any of these matters, as required.

## Health Technology Assessment

The activities undertaken by HIQA in this area are key to driving improvements in the quality and safety of healthcare in Ireland.

Opportunities to engage with and seek the input of the myriad of users, carers, policy makers and providers associated with health and social care services is intrinsic to the delivery of valuable and relevant services.

Engagement with key decision and policy-makers is a vital first step in the development of national initiatives, ensuring that the Authority is supporting current, overarching strategy, and gaining awareness of and co-ordinating on relevant initiatives elsewhere.

The PSI has been very supportive of the national clinical programmes that have included specialist pharmacist contribution to the collaborative research and shared learning, which ultimately will provide a means to effective service delivery and monetary efficiencies as well as improving and standardising patient care. Focus on interaction between the programmes, a source of interprofessional knowledge, and HTA activities would seem a useful tool in progressing vital changes in the health system.

Guiding improvements in general public service experience is at the heart of HIQA's functions, and the sharing of timely information with the public and patients will serve to increase patient ownership of their treatment and care.

## Regulation

HIQA's assessment and monitoring of healthcare services is vital in its contribution to improving the standards of patient care, support and interaction with relevant providers, health and social care professionals. Across each of the main regulated areas, it is inherent to improved compliance and standards that there is opportunity for input, shared learning and channels to raise concerns from all relevant stakeholders, including those providing services.

Pharmacists and pharmacies play a central role in the provision of care and appropriate use of medicines in settings beyond the community pharmacy and hospital dispensary. An integral part of the role of the pharmacist, whether to nursing home or other residential care residents, is in the provision of information and counselling to patients regarding their medicinal therapy and medicines management. The PSI has developed guidance, regarding the supply of medicines to nursing homes and other residential settings, which incorporates HIQA standards and has been provided to pharmacists and pharmacies.

HIQA has actively contributed to PSI public consultations and information gathering requests carried out in the course of our varied work, and HIQA's acknowledgement of the role of the pharmacist in patient care is recognised. The knowledge and expertise of pharmacists should be availed of, as required, to ensure appropriate and effective delivery of care at all levels of service provision.

## Stakeholder Engagement

In accordance with the Memorandum of Understanding between HIQA and the PSI, the PSI will continue to support, collaborate and share information with HIQA. Under the MOU, the PSI would welcome scheduling regular meetings with HIQA personnel in order to discuss matters of mutual interest and concern, in particular oversight of service delivery and standards in residential care centres and medicines management. The PSI notes HIQA's more recent appointment of a number of pharmacist staff, who in addition to the current communication structures, provide a useful point of contact between our organisations. In addition, we acknowledge the willingness of HIQA pharmacists to participate in a number of our ongoing projects and working groups.

The PSI also acknowledges that from time to time it may be beneficial for both organisations to avail of existing channels of communication, and the PSI is open to pursuing opportunities for collaborative message delivery with HIQA, as may be relevant to both organisations statutory remit.

Further collective interaction through the health and social care regulators forum provides useful opportunities for shared learning and development.

4<sup>th</sup> August 2015