Draft National Framework for Medicines Management in Disability Services (HSE)

Submission from: The Pharmaceutical Society of Ireland (PSI) – the Pharmacy Regulator

The Pharmaceutical Society of Ireland (PSI) is an independent statutory body, established under the Pharmacy Act 2007 ('the Act'). It is charged with, and is accountable for, the effective regulation of pharmacy services in Ireland, including responsibility for supervising compliance with the Act. The PSI is also charged with ensuring compliance with certain medicines and controlled drugs legislation. It works for the public interest to protect the health and safety of the public by regulating the pharmacy profession and pharmacies.

The PSI welcomes this opportunity to make a submission to HSE's Draft National Framework for Medicines Management in Disability Services.

The PSI welcomes reference in the draft framework to the important provisions on the control of medicines supply that are enshrined in Irish legislation for the protection of public health and safety. A prescription is a legal document which plays a critical part in the wider regime of strict control over the supply and possession of medicinal products and in order to be considered valid, a prescription must comply with the requirements of the Medicinal Products (Prescription and Control of Supply) Regulations 2003 (as amended), and, for controlled drugs, the Misuse of Drugs Regulations 2017 (as amended). The draft framework sets out these legal provisions very clearly. In addition to the joint guidance on controlled drugs published by PSI and the Medical Council, the PSI also has detailed guidelines on the supply of Prescription Only Medicines (POMs); this could be referenced or linked to under Section 4.3. These guidelines also provide detailed information on S1A, S1B scheduled medicines and emergency supply of medicines.

In Section 4.2 of the draft framework, we suggest clarifying that a physical hard copy of a prescription must accompany any orders for POMs for the avoidance of any doubt. We also have guidance for pharmacists on the Sourcing, Storage and Disposal of medicines in addition to other matters (e.g. record-keeping) which can be accessed here. These documents are regularly reviewed to ensure they are contemporaneous and in line with current legislation. Although pharmacy-specific, these documents may be of assistance to service providers and other healthcare professionals and could be referenced in the framework.

Under section 5.7, we suggest highlighting that CAMs can also interact with the existing prescribed medicines of the patient/service-user, and that the advice of the pharmacist should be sought in

these instances, where necessary. On page 35, we suggest including 'High Tech' medicines[1] in the bullet point list of medicines "which…require special safeguards" as often these medicines are incorrectly supplied/administered resulting in harm to patients.

The PSI, as the pharmacy regulator, is available to provide any further information, clarification or assistance that you require in relation to any matters outlined above or on the framework in general as it relates to pharmacies and pharmacists, and those availing of pharmacy services. The PSI welcomes the HSE's draft National Framework for Medicines Management in Disability Services and commends the work done to date.

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July 2019

[1] High Tech Medicines are medicines supplied to patients under the High-Tech Scheme. The PSI has published guidance for pharmacists to ensure the safe supply of these medicines.