
HIQA's public consultation to inform recommendations on a consent model for the collection, use and sharing of health information in Ireland

Thank you for the invitation to participate in HIQA's public consultation to inform recommendations on a consent model for the collection, use and sharing of health information in Ireland. As the independent statutory regulator of pharmacists and pharmacies in Ireland, PSI welcomes the opportunity to work in partnership with other regulatory authorities, including HIQA on initiatives to ensure the provision of safe and reliable healthcare to patients in all health and social care settings. Please accept our apologies for the late response, the open consultation did not come to our attention until the reminder email issued on 05 January. Please kindly direct any future invitations on consultations to communications@psi.ie or correspondence intended for the Registrar/Chief Officer to registrar@psi.ie.

PSI recognises the importance of ensuring appropriate access to health information that is accurate, valid, reliable, timely, relevant, legible and complete to inform clinical decision making for health and social care professionals and that accurate, relevant and timely health information is also essential in order to improve the provision of care, to inform better decision-making, monitor diseases, plan services, inform policy-making, conduct high-quality research, and plan for future health and social care needs.

We also recognise that the current health information landscape is fragmented and welcome progress on the development of an overarching legislative framework to support the safe and effective use of personal information for both direct care and beyond direct care. We agree with the proposed recommendations to develop a coherent and integrated approach to health information based on a patient rights model, appropriate standards and international best practice.

As the regulatory body for pharmacists and pharmacies that are engaged in frequent direct care to patients across the health system, PSI considers it is essential to a patient's wellbeing that within such future models pharmacists have appropriate access to required patient medication history and any associated information to ensure a full and accurate clinical check can be performed on any medication prescribed.

We also support the findings and recommendations in relation to ePrescribing and eHealth, however consideration should be given to clarifying the proposal for the oversight of the new proposed governance structures including eHealth Ireland. We note the reference within the associated reports to the introduction of temporary amendments to legislation to allow for the electronic transfer of prescriptions to ensure patients could continue to access their ongoing treatment and 'regular' medicines during the COVID-19 pandemic. The PSI, Medical Council and HSE have issued

[Joint Guidance for Prescribers and Pharmacists on legislation changes to facilitate the safe supply of medicines during the Covid-19 pandemic.](#) While these temporary amendments continue to be of benefit in ensuring patients can access their medicines from community pharmacies during the COVID-19 pandemic, we consider that there is now an urgent need to progress a fully integrated ePrescribing system in Ireland based on national and international standards for health information.

The PSI looks forward to continuing to work with HIQA in the future in delivering on our respective regulatory roles to provide and assure patient and public health and safety.

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