

Pharmacy Staffing Levels – Consultation Guidance

13 October to 9 December 2022

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About the Pharmaceutical Society of Northern Ireland

The Pharmaceutical Society of Northern Ireland is the regulatory body for pharmacists and registered pharmacies in Northern Ireland.

Our primary purpose is to ensure that practising pharmacists in Northern Ireland are fit to practise, keep their skills and knowledge up to date and deliver high quality safe care to patients.

It is the organisation's responsibility to protect and maintain public safety in pharmacy by:

- setting and promoting standards for pharmacists' admission to the Register and for remaining on the Register, and the standards for registered pharmacy premises;
- maintaining a publicly accessible Register of pharmacists and pharmacy premises;
- handling concerns about the Fitness to Practise of pharmacists, acting as a complaints portal and acting to protect the public; and
- ensuring high standards of education and training for pharmacists in Northern Ireland.

Why are we consulting?

There is a growing body of evidence¹ that guidance on appropriate staffing levels within healthcare is necessary to ensure that patients' needs are met, public safety is maintained and that staff have the appropriate skills, qualifications and competence to carry out their role and, where relevant, supervise the work of another.

In 2018, the Council of the Pharmaceutical Society NI (the Council), following a public consultation, approved new Premises Standards pending commencement of the Pharmacy (Premises Standards, Information Obligations, etc.) Order 2016 which enabled the Council to set Standards for Pharmacy Premises in connection with the carrying on of retail pharmacy businesses,² at or from a registered pharmacy, by the person(s) carrying on that business and will give new powers to enforce these Standards. However, the Commencement Order for these Standards is still awaited in Northern Ireland.²

Considering the conclusions of the Pharmacy Workforce review and the pending commencement of the Premises Standards, engagement was undertaken with a range of stakeholders to form proposals for the Council on guidance to address the issue of appropriate pharmacy staffing.

The engagement suggested that, due to the number of variables involved, the increasing use of automation and, most importantly, the rapidly changing role of pharmacists and the pharmacy teams, a principle-based guidance may be the most appropriate way forward to address the issue. Council agreed with this approach and the current draft Guidance was developed using the best practice from Great Britain and incorporating relevant standards from the Premises Standards and Professional Standards of Conduct, Ethics for Pharmacists in Northern Ireland (2016) (the Code).³

We are now consulting on the proposed principle-based guidance which explains what Pharmacy Owners⁴ and Superintendents, must do to ensure that each pharmacy has enough skilled and qualified staff, with an appropriate skills mix, to provide safe and effective pharmacy services which meets the standards set out in the Premises Standards, when commenced. This applies to all pharmacies registered with the Pharmaceutical Society NI. The principles and guidance will also be of relevance to all pharmacy sectors in Northern Ireland, even though we may not be the formal systems regulator in these spaces.

¹ The Pharmacy Workforce Review 2020 for example, concluded that 'pharmacy workforce pressure can 'increase work-related stress, decrease staff morale, and cause pharmacist burnout which, in turn, can compromise patient safety' and that, 'in-line with the increasing concerns for safe staffing across the health professions, safe staffing standards for pharmacy staff must be developed to ensure patient safety,' which is applicable to all sectors of pharmacy practice. Further information can be accessed at <https://www.health-ni.gov.uk/publications/pharmacy-workforce-review-2020> (accessed 1 June 2022)

² Legislation commencement order for these standards is still to be commenced, in August 2022

³ Professional standards of conduct, ethics and performance for pharmacists in Northern Ireland (2016) Available from [22504-PSNI-Code-of-Practice-Book-final.pdf](#) (Accessed 1 June 2022)

⁴ Pharmacy Owner: is accountable for ensuring their pharmacy meets the Premises Standards. Where the Pharmacy Owner is a corporate body; the 'body' is accountable for the corporate governance of the business, including the appointment and management of a Superintendent Pharmacist.

Who should be interested in responding?

The proposed Guidance should be of interest to the public and patient representative bodies in Northern Ireland, as it outlines what they may expect in relation to the staffing levels in pharmacies. It should also be of interest to Pharmacy Owners, Superintendents, pharmacists, and unregistered pharmacy staff.

Draft Guidance on Pharmacy Staffing Levels

The proposed Draft Guidance on Pharmacy Staffing Levels is split into four main sections.

Section 1: About this Guidance outlines the need for the guidance and introduces the principles on which the Guidance is based. It outlines the inspection regime for registered pharmacies.

Section 2: Accountability outlines that the Pharmacy Owner's and Superintendent's first responsibility is to ensure patient safety through the safe and effective provision of pharmacy services which includes ensuring that each pharmacy has enough skilled and qualified staff to allow all legislative obligations, pharmacy contractual services and regulatory obligations to be met, to meet the workload involved in following Standard Operating Procedures and to carry out other work to ensure that the pharmacy team's workload or working conditions do not compromise patient care or public safety.

Section 3: Staffing Levels and The Provision of Safe and Effective Pharmacy Services sets out some of the matters Pharmacy Owners and Superintendents must consider in their governance arrangements to managing any risks, including staffing levels, which might affect the safe and effective provision of pharmacy services.

Section 4: Knowledge, Skills, and Competence sets out guidance as to what a Pharmacy Owner and Superintendent must consider to ensure that arrangements are in place so that staff members have the appropriate authority and requisite skills and knowledge to competently provide pharmacy services and are properly held to account for the health and wellbeing of patients and the public to whom pharmacy services are provided.

Schedule 1: Example Training Courses for Unregistered Members of the Pharmacy Team.

An example Schedule has been included in the consultation for illustrative purposes only and does not form a part of the consultation.

The example Schedule sets out the rationale for Council to consider issuing guidance for a list of recommended education and training courses for non-registered support staff. Persons under Article 4B (2) Pharmacy (Northern Ireland) Order 1976.

Further proposals will be brought to Council in relation to a list of recommended education and training courses for non-registered pharmacy staff.

How can I respond to this Consultation?

You can find the Draft Guidance on Pharmacy Staffing Levels and all documents relating to the Consultation on the Pharmaceutical Society NI website:

<http://www.psni.org.uk/publications/consultations/>

You are requested to complete a response form based on the questions outlined below and return it to the Pharmaceutical Society NI.

This **8-week** Consultation **ends on 09 December 2022**.

Responses can be returned electronically to consultations@psni.org.uk or by post to:

Consultation on Pharmacy Staffing Levels
Pharmaceutical Society of Northern Ireland
73 University Street
Belfast
BT7 1HL

For further information on responding to this Consultation, please contact Mark Neale at consultations@psni.org.uk or telephone 02890326927.

Consultation Questions

We would welcome your views on the questions outlined below. **It is important that you provide reasons for your answers, where possible, in order that the Council of the Pharmaceutical Society NI can understand the rationale for your views.** We have provided a response template to complete which is available on the website: <http://www.psni.org.uk/publications/consultations/>

1. Section 1: About this Guidance.

Question 1: Does Section 1, 'About this Guidance', clearly outline the need for the guidance and introduce the principles on which the guidance is based?

Yes, No, Unsure

Comments Section

2. Section 2: Accountability

Question 2: Do you consider the proposals outlined in Section 2 'Accountability', are appropriate?

Yes, No, Unsure

Comments Section

Question 3: Is the proposed guidance outlined in Section 2, Accountability, clear?

Yes, No, Unsure

Comments Section

3. Section 3: Staffing Levels and the Provision of Safe and Effective Pharmacy Services.

Question 4: Does Section 3, 'Staffing Levels and the Provision of Safe and Effective Pharmacy Services', clearly set out the relevant factors the Pharmacy Owner(s) and Superintendent(s) must consider in the fulfilment of their robust governance arrangements to ensure proper management of any risks, including staffing levels, which might affect the safe and effective provision of pharmacy services?

Yes, No, Unsure

Comments Section

4. Section 4: Knowledge, Skills, and Competence.

Question 5: Is Section 4, 'Knowledge, Skills, and Competence', clear on the matters a Pharmacy Owner and Superintendent must consider to ensure that arrangements are in place so that staff members have the appropriate authority, requisite skills and knowledge to competently provide pharmacy services and are properly held to account for the health and wellbeing of patients and the public to whom pharmacy services are provided?

Yes, No, Unsure

Comments Section

5. Example Schedule 1: Training Courses for Unregistered Pharmacy Support Staff

An example Schedule has been included in the consultation for illustrative purposes only and does not form a part of the consultation.

Further proposals will be brought to Council in relation to a list of recommended education and training courses for non-registered pharmacy staff.

6. General Question

Question 6: Do you have any other comments about the proposed Guidance on Pharmacy Staffing Levels?

Yes, No

Comments Section

7. Equality Assessment

Question 7: The Pharmaceutical Society NI has carried out an equality assessment on the proposed Guidance on Pharmacy Staffing Levels.

Do any aspects of our proposals have equality implications for groups or individuals based on one or more of the following categories? If yes, please explain what could be done to change this. We would welcome any research/sources you may have to evidence your response.

- Age
- Gender
- Disability
- Pregnancy and maternity
- Race / ethnicity
- Religion or belief
- Political Opinion
- People with dependants
- Sexual orientation
- Marital Status

Yes, No, Unsure

Comments Section

Accessibility of information

If you are having difficulties accessing the documentation or you need us to make adjustments to enable you to respond to this Consultation, please contact us and we will do our best to address the issue.

If you wish your response to remain confidential, you should indicate this in your response and the Pharmaceutical Society NI will generally respect this request. However, the information you provide may be subject to disclosure under the Freedom of Information Act 2000.

How will we respond to Consultation feedback?

Once the Consultation period ends, all Consultation responses will be considered and a report analysing the Consultation responses will be produced and presented to Council. Once approved by Council it will be published on our website.

The Council of the Pharmaceutical Society NI will consider all the Consultation responses and, based on the feedback received, will decide if and how the Guidance on Pharmacy Staffing Levels should be amended.

The Guidance on Pharmacy Staffing Levels will be considered by the Council of the Pharmaceutical Society NI and if approved, will be published.