
HIQA's public consultation on Draft National Standards for Information Management in Health and Social Care

Thank you for the invitation to participate in HIQA's public consultation on draft National Standards for Information Management in Health and Social Care. As the independent statutory regulator of pharmacists and pharmacies in Ireland, the PSI welcomes the opportunity to provide feedback as part of this consultation.

PSI strongly agrees that effective management of information across the health and social care system is essential to achieving the Sláintecare vision and to supporting high-quality, safe services with timely, evidence-based decision-making, and improving patient safety and quality of care.

Scope and content of the Standards

PSI welcomes the expansion of the scope of the Standards to include all services and organisations that collect, use or share health and social care information. PSI agrees that a whole-system approach is required to drive real improvements in the quality of health and social care information in Ireland and that in order to improve information management across the entire system, the Standards need to be used by all services and organisations that collect, use or share health and social care information at any stage of the data and information lifecycle, including pharmacies. Pharmacies are an important source of health information such as vaccination records and dispensing records. In fact, pharmacies are the definitive source of information on medication dispensed to patients in the community setting.

It is recognised by the EU Health Data Space that pharmacy professionals are one of the categories of healthcare professionals who generate and use critical healthcare data within the health care system. In this regard, we would suggest that specific reference to pharmacy professionals be made in the Standards to provide greater clarity and to encourage engagement and adoption of the Standards in pharmacies, from the outset.

It must also be acknowledged that there will be a number of challenges to implementing the Standards in pharmacies. Community pharmacies are privately owned health care providers. The primary ICT systems used for the recording and management of patient records are not integrated or connected with those used in other areas of the health and social care system. (A recently implemented notable exception to this is the HSE Pharmavax system used by pharmacies to record vaccines for COVID-19, influenza and pneumococcal disease, which does include some integration with other systems). In our response to HIQA's recent public consultation on draft recommendations on a model for health information standards to support the delivery of health and social care services in Ireland, we highlighted how it is essential that any future proposed health

information standards or ICT solutions intended to enable the sharing of health information consider access and input by pharmacists, as relevant to their roles in the provision of services and care to patients, including those services that will develop as envisaged by Sláintecare.

In the absence of a more integrated ICT solution that can facilitate improved information management practices and the sharing of health information across the system, and in advance of upcoming Irish and EU legislation relating to health information and data protection, PSI supports the use of the Standards as a **roadmap** for services and organisations that collect, use or share health and social care information but currently fall outside HIQA's legislative remit in this area (page 19).

The Standards outline quite clearly (page 19) that these services are strongly encouraged, rather than required to apply the standards, and recognise that the arrangements that each service and organisation put in place will vary depending on type of work, size and complexity, but that the principles, standards and features can still be applied.

PSI agrees that, broadly, the three principles, twelve standards and features can be applied in practice to information management within pharmacies, despite the considerable variation across ownership structure of pharmacies and the fragmented nature of pharmacy as a private and community-based sector. We would highlight, however, that smaller private providers such as community pharmacies may need extra support in implementing and adopting the Standards as a roadmap, for example, collective resources or tools to aid understanding and support implementation by smaller operators.

Recognising the importance of good health information management across the health and social care system as a key enabler of Sláintecare and safe, high-quality services, PSI would be very willing to work with and engage with HIQA in this regard, in helping to support pharmacists and pharmacy owners to contextualise and adopt the Standards in their pharmacy/pharmacies.

Importance of information management

We note that a number of positive initiatives that were developed during the COVID-19 pandemic are listed on page 16. We would suggest the addition of the National Electronic Prescription Transfer system, known as Healthmail, which enables the electronic transfer of prescriptions from prescribers to pharmacies, and two-way communication to support management of queries. However, it has been recognised that this is an interim solution and is not an ePrescribing system. A long-term sustainable ePrescribing system for Ireland is needed, and PSI welcomes the progress being made within the ePharmacy Programme to progress this important initiative.

How the Standards will be monitored

On page 21 (Structure of the draft national standards), under the heading "Standards" we note that the word "must" is used in relation to the requirement or obligation for a given standard, which we support. In the Standards themselves that follow, however, the word "should" is used throughout. We consider that organisations may benefit from greater clarity around the use of must/should in the standards, e.g. "what an organisation should do". We would also suggest that it be explicitly clear what the consequences of not engaging with the Standards will be for the organisation.

Language and structure

The Standards are well-structured. The inclusion of a statement written from an individual service user's perspective is effective. By including the service user/patient voice, organisations who use the Standards will be reminded of why they are in place.

PSI is also in agreement that public trust in Irish health information systems is essential (page 17). Rather than aiming to *maintain* current levels of trust, however, in light of the recent cyberattack on the HSE in 2021, a greater rise in cyberattacks and cyber-crime in general and greater public understanding of the importance of data protection of their sensitive health data, perhaps the aim should be to *grow and assure* public trust in this area.

Conclusion

The PSI is happy to engage further with HIQA on these Standards and would ask that we be included in any further development work pertaining to implementation from a pharmacy perspective. We intend to encourage the adoption of the finalised Standards within all pharmacies in Ireland and we look forward to continuing to work with HIQA and our other stakeholders to achieve the Sláintecare vision of providing the right care, in the right place at the right time and in ensuring a high-quality, safe service for patients and the public.

PSI – The Pharmacy Regulator, PSI House, Fenian St, Dublin 2, D02TD72

January 2023