



Position paper on clinical governance for the planning, oversight and delivery of clinical care for older people in Residential Care Services in Ireland (DRAFT)

Feedback Form

The *COVID-19 Nursing Homes Expert Panel Report* was published by the Department of Health in August 2020 and made a number of recommendations regarding services provided to older people living in residential care facilities in Ireland. This publication made recommendations regarding strengthening of clinical governance in nursing homes, specifically Recommendation 8.6, which indicates that interim guidance on the role and composition of clinical governance oversight committees be developed.

The HSE *Position paper on clinical governance for the planning, oversight and delivery of clinical care for older people in Residential Care Services in Ireland (August 2022)* was prepared in response to Recommendation 8.6 and presents guidance including recommendations on common elements of clinical governance regardless of a residential care facility or nursing home funding or ownership model. It is proposed that the recommendations of this paper will be implemented in a small number of demonstrator residential care facility sites in the coming months and that this exercise will identify operational detail as part of further guidance on clinical governance.

The Health Service Executive is now engaging with key stakeholders to provide an opportunity for them to consider and provide high level feedback on the draft position paper.

We would be grateful if you could complete and return this template to [insert working group member email] by **5pm on 12th September 2022**.

Name(s)	Pádraig Corbett
Contact details	padraig.corbett@psi.ie
Organisation	The Pharmaceutical Society of Ireland (PSI) – the Pharmacy regulator
Date	5 October 2022

If you wish to provide general feedback (critical edits only), please do so in the text box overleaf.



Position paper on clinical governance for the planning, oversight and delivery of clinical care for older people in Residential Care Services in Ireland (DRAFT)

Thank you for the opportunity to participate in the public consultation on the HSE's draft position paper on clinical governance for the planning, oversight and delivery of clinical care for older people in Residential Care Services in Ireland. As the independent statutory regulator of pharmacists and pharmacies in Ireland, the PSI welcomes the opportunity to work in partnership with our key stakeholders, such as the HSE, on initiatives to strengthen the provision of safe, high-quality healthcare to patients in all health and social care settings, including residential care facilities.

As the pharmacy regulator, we regulate community pharmacies in Ireland, many of whom provide medicines and services to patients in residential care facilities. The PSI publishes practice guidance for pharmacists and pharmacy owners to facilitate compliance with pharmacy and medicines legislation and to ensure high standards of practice. PSI has developed [guidance](#) to support pharmacists in meeting their legal and professional obligations to patients in residential care facilities. In the provision of pharmacy services to these patients, pharmacists must ensure that they provide the same level of professional care and attention as they would to those patients who attend personally at their pharmacies. This includes the legislative requirements of patient counselling and pharmaceutical and therapeutic reviews.

The PSI agrees that the development and application of a national clinical governance framework is a key undertaking to address the lessons learned from the COVID-19 pandemic across the health and social care sector and we support and agree with the recommendations outlined in the position paper. We note that the proposed model of clinical governance for residential care facilities in Ireland states that providers 'should' implement each of the recommendations. We consider, however, that it should be **mandatory** to implement these recommendations, and this should be supported by necessary legislation.

We strongly agree that the care of older persons requires a multidisciplinary approach and support the view of the COVID-19 Nursing Homes Expert Panel in stressing the importance of the lead general practitioner in providing clinical support and services in residential care facilities and as a core member of the clinical governance and oversight committee.

We consider that pharmacists should also play a key role as a member of the clinical governance and oversight committee in a residential care facility. Pharmacists, as healthcare professionals, have unique skills and specialist medicines expertise which could be utilised more effectively, towards improved patient outcomes, particularly as medicines increase in complexity and polypharmacy becomes more prevalent among older people.

The paper proposes that the introduction of advanced practice roles for health and social care professionals would enhance the development of health and social care professional led services for older persons within community and residential care facilities to enable them access to the care and support required to live to their full potential. This proposal aligns with PSI's current strategic direction.

In our current corporate strategy, one of our strategic objectives is to advance the role of pharmacy and pharmacists in the future integrated healthcare system. PSI would welcome the development of advanced practice roles for pharmacists as part of the rollout of a greater integrated health service



under Sláintecare, and would be amendable to putting in place any regulatory frameworks or safeguards necessary to facilitate advanced practice roles for pharmacists across health and social care settings, including residential care facilities for older persons. We would also be happy to oversee the development and delivery of any necessary CPD programmes in clinical governance and management for pharmacists which would support their involvement in the clinical governance and oversight committees.

We also fully support the proposed recommendation that each clinical governance oversight committee include a resident/advocate representative. This measure would help strengthen the involvement of patients and patient advocates in residential care facilities.

We welcome that the recommendations outlined in the position paper would apply to all residential care facilities, regardless of the ownership model and we strongly agree with the paper's position that all persons who live in residential care facilities should receive the same standard of care and equity of access to health services as the general population living in community, and regardless of whether their provider is public, private or voluntary.

We are also in agreement that national progress on electronic medical records and a unique patient identifier system would be a key enabler to strengthen the clinical governance in residential care facilities and to enable the sharing of information, support multi-disciplinary care, safe transitions of care and to drive quality and safety in health and social care settings. We recognise that effective information and communications technology (ICT) has a critical role to play in healthcare delivery, by ensuring that information to drive quality and safety in health and social care settings is available when and where it is needed.

Finally, we agree with the HSE that it is essential, in addition to the measures to strengthen the clinical governance of residential care facilities, that the other recommendations of the Expert panel are also addressed including those around monitoring and staffing.

The PSI looks forward to continuing to work with the HSE in the future development of the strengthening of clinical governance in residential care facilities and patient safety and remains available to engaging with the HSE on particular aspects of this important area that relate to our role.

We would be grateful if you would ensure to include us when circulating any documents for input or public consultation in future, in relation to pharmacy, pharmacists or health and social care provision where the input of PSI – the Pharmacy Regulator may be relevant and of assistance. Useful email addresses to send any relevant correspondence include registrar@psi.ie and/or info@psi.ie.

**PSI – The Pharmacy Regulator, PSI House, Fenian St, Dublin 2, D02TD72
October 2022**

Thank you for your time and support