



The Pharmacy Regulator
An Rialtóir Cógaisíochta

Safe Staffing Guidelines

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consultation
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1. Context

Safe staffing is a foundational component of all healthcare settings, including retail pharmacy businesses. Given the increasing complexity of clinical services delivered in community pharmacies, and the inherent risks associated with the sale and supply of medicines, it is essential that staffing arrangements support the consistent delivery of safe, high-quality, and compliant services. As pharmacy services continue to grow, it is necessary to continually review and assess available resources. This ongoing evaluation is vital in maintaining safe staffing levels, thereby ensuring the provision of quality care, patient safety, and regulatory compliance.

The PSI has developed these principles-based guidelines to help those in pharmacy governance roles ensure safe staffing levels, adequate staff mix, and appropriate rest periods in pharmacies, following recommendations from the [2023 PSI Workforce Intelligence Report](#).

2. Legislative basis

The Pharmacy Act 2007 (as amended) (the Act) mandates that each retail pharmacy business nominates individuals or entities to three key governance roles, pharmacy owner, superintendent pharmacist, and supervising pharmacist. Regulations and rules made under the Act provide further detail on the responsibilities associated with these roles.

Each pharmacy premises must have a registered pharmacist with at least three years post-registration experience occupying the roles of superintendent and supervising Pharmacist. In addition to the statutory governance roles, the Act and associated regulations require each pharmacy to have a registered pharmacist at the pharmacy to supervise the sale and supply of medicines at all times.

The Regulation of Retail Pharmacy Businesses Regulations (S.I. No. 488 of 2008) ('the Regulations') sets out clear legal obligations in relation to staffing. Each pharmacy is required to maintain appropriate staffing to ensure safe, effective service delivery. This includes having competent personnel in line with professional and regulatory standards. Furthermore, the Regulations outline specific requirements for the management and supervision of retail pharmacy businesses. These provisions reinforce the necessity for

suitably qualified individuals occupying pharmacy governance roles¹, to exercise oversight and ensure that staffing arrangements support the delivery of safe, high-quality care to patients and the public.

Additionally, the Organisation of Working Time Act 1997 covers rest periods, working hours, and notification requirements for rostered staff. The enforcement of the Organisation of Working Time Act falls under the remit of the Workplace Relations Commission (WRC). When considering staffing in pharmacies other relevant legislation relating to equality and health and safety should be considered.

3. Purpose of the Guidelines

The main purpose of these guidelines² is to set out the key responsibilities of pharmacists and those in pharmacy governance roles to facilitate compliance with the Regulation of Retail Pharmacy Business Regulations 2008 (as amended).

This document outlines the regulatory expectations for pharmacy owners, superintendent pharmacists, and supervising pharmacists regarding staffing levels, skill mix, and appropriate rest periods, aligned with statutory obligations, with the paramount aim of ensuring patient and public safety.

The purpose of these guidelines includes:

- Clarifying the responsibilities of governance roles in staffing decisions.
- Supporting ongoing improvements in quality and patient safety.
- Introducing a main principle and accompanying indicators to embed safe staffing assessment and practice.
- Highlight the link between staff wellbeing, staff retention and patient safety.

The guidelines seek to support those in pharmacy governance roles, to identify any imbalance between the demands on pharmacy staff and the human resource capacity available to meet those increasing demands.

¹ [PSI Guidelines on Pharmacy Governance Roles](#) provides a principle-based outline of the governance responsibilities of the pharmacy owner, superintendent pharmacist, supervising pharmacist, and all pharmacists involved in the operation of a retail pharmacy business.

² These guidelines have been prepared with a view to publication in compliance with Regulation 14 of the Regulation of Retail Pharmacy Businesses Regulations 2008 (S.I. No. 488 of 2008), which provides that the PSI Council may publish guidelines for the purpose of facilitating compliance with these Regulations.

Appropriate staffing is a key element of pharmacy operations, patient safety, and service delivery. Implementation of the primary principle in these guidelines enables pharmacies to establish robust staffing models that support staff and maintain consistent care standards. This document functions as both a regulatory and operational reference for decision-making to promote a safe and effective working environment. As the guidelines specifically address safe staffing, it does not encompass all professional responsibilities and should be used in conjunction with the Pharmacy Act 2007 (as amended), relevant pharmacy and medicines legislation, the PSI Code of Conduct, PSI guidance and guidelines, and all other relevant legislation. Where the term “pharmacy” is used in these guidelines, it refers to a retail pharmacy business as defined in the Act.

The pharmacy owner, superintendent pharmacist and supervising pharmacist have specific responsibilities and actions to take, to assure the realisation of each of the four indicators of safe and effective pharmacy staffing. While some actions may be shared across several roles, they apply at different levels depending on the nature of the role. For example, pharmacy owners will tend to have overall responsibility for ensuring the safe and compliant operation of the business; the superintendent pharmacist will be responsible at a governance and leadership level, the supervising pharmacist will be responsible for the management and day-to-day operation of the pharmacy and every pharmacist will be responsible for actively monitoring any staffing issues and raising any concerns with the appropriate accountable individuals.

A person acting in a governance role can delegate aspects of their duties to another; however, responsibility for ensuring the task has been completed appropriately remains with the person in the governance role.

4. Structure of the Guidelines

The guidelines set out an overarching principle, with four indicators to support the provision of safe staffing in pharmacies, with an accompanying self-assessment checklist (appendix 1) for those in governance roles to consider in conjunction with the guidelines.

The guidelines are intended to be supportive, offering flexibility for implementation, as the pharmacist(s), support staff, staff skill mix, and the services provided will be unique to each individual pharmacy. Regardless of the specific arrangements, however, the same principle and accompanying indicators apply to every pharmacy.

The pharmacy owner, superintendent pharmacist and supervising pharmacist, working at the pharmacy, have specific responsibilities under each of the four overarching indicators to support safe staffing within the pharmacy.

The sections which follow set out:

- Safe staffing principle
- Indicators
 - Safe and compliant pharmacy systems with patients at the centre
 - Responsibilities for the pharmacy owner, superintendent pharmacist and supervising pharmacist
 - Leadership, accountability and communication
 - Responsibilities for the pharmacy owner, superintendent pharmacist and supervising pharmacist
 - Risk management and workforce planning
 - Responsibilities for the pharmacy owner, superintendent pharmacist and supervising pharmacist
 - Competence, integrity and staff development
 - Responsibilities for the pharmacy owner, superintendent pharmacist and supervising pharmacist

5. Safe Staffing Principle

Pharmacy services are delivered by sufficient, competent, empowered and supported staff, in a manner that prioritises patient safety, complies with legislation, fosters continuous improvement, and takes account of the services, activity and operational demands of the individual pharmacy practice.

Indicators



1. Safe and compliant pharmacy systems with patients at the centre

Pharmacy staffing ensures the safe supply of medicines, delivery of services, and patient counselling in line with legislation and procedures.



2. Leadership, accountability and communication

Clear leadership defined responsibilities, and effective communication underpin safe staffing decisions and strong team performance. Pharmacy staff deliver compassionate care across all patient profiles, adapting their communication style to meet individual needs.



3. Risk management and workforce planning

Pharmacy staffing is proactively planned and continuously refined to manage risks and respond to evolving patient needs, informed by active monitoring and feedback by all staff. Safe service delivery is supported by tailored staffing decisions that reflect the specific context of each pharmacy, including at a minimum service range, skill mix, and patient cohort.



4. Competence, integrity and staff development

Pharmacy staff are competent, well-supported, and committed to patient safety. They have access to continuous professional development and consistently demonstrate the attitudes and behaviours patients expect, including professionalism, integrity, and effective communication.

Safe and compliant pharmacy systems with patients at the centre

Pharmacy Owner	Superintendent Pharmacist	Supervising Pharmacist
<ul style="list-style-type: none"> You implement pharmacy procedures and ensure that staff are appropriately trained and competent to follow them. <p>You are responsible for assessing the specific context of each pharmacy when setting staffing levels. This includes considering the range of services offered, the appropriate skill mix, and the number of staff needed to deliver services safely. You should also take into account patient needs and ensure provision for protected time, either during or outside opening hours, for complex tasks</p>	<ul style="list-style-type: none"> You implement pharmacy procedures and ensure that staff are appropriately trained and competent to follow them. <p>You take into account the specific circumstances of each pharmacy and apply a tailored approach to staffing, ensuring sufficient skilled and qualified personnel are in place to deliver safe and effective pharmacy services</p>	<ul style="list-style-type: none"> You implement pharmacy procedures and ensure that staff are appropriately trained and competent to follow them. You ensure that pharmacy staffing levels are routinely assessed to support the safe supply of medicines, delivery of pharmacy services, the provision of appropriate advice and counselling in line with legislation, guidelines, and pharmacy procedures, and provide feedback including reporting any issues to the superintendent pharmacist and pharmacy owner

Leadership, accountability and communication

Pharmacy Owner	Superintendent Pharmacist	Supervising Pharmacist
<ul style="list-style-type: none"> You document any staffing decisions which are risk-based in conjunction with the superintendent and supervising pharmacist, and these decisions are reviewed at appropriate intervals. You ensure that inclusive leadership from those in pharmacy governance roles promotes the health, wellbeing and security of pharmacy staff, supporting staff retention and fostering a culture of continuous improvement. You provide a structured regular communication process to address staffing needs and other issues raised by the pharmacy team. You respond to and resolve issues you are made aware of, including the appropriateness of staffing levels, staff training, and pharmacist cover at the pharmacy. You have overall responsibility for ensuring the pharmacy team are provided with the necessary staff, premises, procedures, and equipment required for the pharmacy to deliver safe and 	<ul style="list-style-type: none"> You document staffing decisions which are risk-based in conjunction with the pharmacy owner and supervising pharmacist, and these decisions are reviewed at appropriate intervals. You ensure that inclusive leadership from those in pharmacy governance roles promotes the health, wellbeing and security of pharmacy staff, supporting staff retention and fostering a culture of continuous improvement. You institute a structured regular communication process to address staffing needs and other issues raised by the pharmacy team You review and resolve, where possible, any issues you are made aware of relating to staffing levels, training needs, resources, premises, or equipment. You escalate to the pharmacy owner where necessary. You ensure the staffing levels, skill mix, and level of pharmacist cover are sufficient for the services being provided at the pharmacy, bearing in 	<ul style="list-style-type: none"> You document staffing decisions which are risk-based in conjunction with the pharmacy owner and superintendent pharmacist, and these decisions are reviewed at appropriate intervals. You ensure that inclusive leadership from those in pharmacy governance roles promotes the health, wellbeing and security of pharmacy staff, supporting staff retention and fostering a culture of continuous improvement. You operate a structured regular communication process to address staffing needs and other issues raised by the pharmacy team. You monitor staffing at the pharmacy on a day-to-day basis to ensure the correct personnel (including pharmacists) and skills are available to support the safe provision of quality care for patients. You plan for busy periods and the provision of additional services. You ensure all staff (including pharmacists and yourself) are given appropriate rest breaks.

<p>effective patient-centred care and pharmacy services.</p> <ul style="list-style-type: none"> • You ensure rest breaks are facilitated for all staff (including pharmacists). • You ensure that pharmacists working in the pharmacy are facilitated in meeting their professional and legal obligations. 	<p>mind busy periods and the provision of additional services.</p> <ul style="list-style-type: none"> • You ensure all staff (including pharmacists) are given appropriate rest breaks. • You clearly define and communicate the roles and responsibilities of all pharmacy team members • You use safety assessment tools for regular staffing reviews, for example, safe staffing standard operating procedures (SOPs) • You ensure that pharmacists working in the pharmacy are facilitated in meeting their professional and legal obligations, including exercising their professional judgement in the interest of patient safety. 	<ul style="list-style-type: none"> • You clearly define and communicate the roles and responsibilities of all pharmacy team members • You ensure that effective internal communication supports staff retention and operational efficiency • You ensure that all pharmacists including yourself, working in the pharmacy are facilitated in meeting their professional and legal obligations, including exercising their professional judgement in the interest of patient safety.
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Risk management and workforce planning

Pharmacy Owner	Superintendent Pharmacist	Supervising Pharmacist
<ul style="list-style-type: none"> You determine staffing plans on current and projected clinical, and service needs in consultation with the superintendent and supervising pharmacist including appropriate leave management. You ensure that workforce planning includes the assessment of current staffing, forecasting future needs (considering demographic and role changes), identifying any gaps in skill mix, and the development of action plans including recruitment and retention of staff. You encourage all staff to actively monitor staffing issues, engage constructively and encourage feedback 	<ul style="list-style-type: none"> You ensure that staffing models enable error reporting, incident review, and continuous improvement. You assess current staffing, forecast future needs (considering demographic and role changes), identify any gaps in skill mix, and develop action plans including the recruitment and retention of staff when workforce planning. You establish a process to facilitate all staff to actively monitor staffing issues and provide a platform to engage constructively and encourage feedback. 	<ul style="list-style-type: none"> You monitor and escalate staffing-related risks as appropriate to the superintendent pharmacist and pharmacy owner, including any near misses or errors which may be related to staffing issues. You operate a process to facilitate all staff to actively monitor staffing issues and to facilitate feedback.

Competence, integrity and staff development

Pharmacy Owner	Superintendent Pharmacist	Supervising Pharmacist
<ul style="list-style-type: none"> You ensure that pharmacy staff have the appropriate knowledge, skills and competence appropriate to their role in the pharmacy team You prioritise patient safety over commercial targets when making staffing decisions. You promote and encourage both internal and external training options where applicable to enhance pharmacy staff skills and qualifications You provide ongoing training supports and encourage staff development and retention, signalling a commitment to enhance the role of all members of the pharmacy team 	<ul style="list-style-type: none"> You ensure that pharmacy staff must have the appropriate knowledge, skills and competence appropriate to their role in the pharmacy team You promote and encourage both internal and external training where applicable to enhance pharmacy staff skills and qualifications You provide ongoing training supports and encourage staff development and retention, signalling a commitment to enhance the role of all members of the pharmacy team 	<ul style="list-style-type: none"> You lead by example and facilitate ongoing training supports and encourage staff development and retention, signalling a commitment to enhance the role of all members of the pharmacy team You proactively and continuously evaluate the staffing plans, skill mix and staffing levels, and address any deficiencies with the superintendent and/or owner, taking into consideration ongoing training or new members of the team.

Appendix 1: Self-Assessment Checklist for Safe Staffing

This self-assessment checklist is designed to help you follow the guidelines and evaluate whether your pharmacy's staffing levels are safe. While it covers many key points from the guidelines, it is not exhaustive and should be used alongside all relevant guidelines and requirements when reviewing staffing needs. Each indicator from the guidelines is explained below, along with factors to consider when deciding on appropriate staffing levels in your pharmacy. You are encouraged to evaluate all indicators collectively in your self-assessment or to assess them individually, as appropriate.



Safe and compliant pharmacy systems with patients at the centre

When evaluating criteria within this indicator, factors including the quantity and variety of items dispensed, dispensing procedures, sources of prescriptions, potential medication shortages, and the specific characteristics of medicines, such as specialised products and counselling requirements, should be considered.

Ask yourself	Yes	No	N/A	Required Action
Do you adjust staffing levels to reflect peak time and changing demand within the pharmacy throughout the day, week and month? Do you consider any potential trends in dispensing data?				
Do you consider the range and complexity of prescriptions supplied, such as community drug schemes, regular and acute prescriptions, new patients, and high-tech items?				
Is consideration given to the different ways the pharmacy receives prescriptions, such as walk-in prescriptions, Healthmail, etc, and are these incorporated into your daily workflow?				
Do you consider the opening hours of nearby healthcare				

facilities when planning pharmacy workload?				
Have you reviewed the sale and supply of over-the counter medicines, and the appropriate pharmacist supervision of these?				
Have you reflected on how your pharmacy manages the workload associated with medicines shortages, including checking stock, sourcing medicines from authorised suppliers, counselling patients, and ensuring pricing transparency?				
Is there a structured process for medicines reconciliation and optimisation across all relevant care settings?				
Does the pharmacy layout and opening hours support safe levels of staffing to provide pharmacy services to patients and the public?				
When errors or near misses occur, are they reviewed to determine if staffing levels were a factor, and are appropriate corrective actions implemented as needed?				



2. Leadership, accountability and communication

This indicator supports pharmacy teams to foster a culture of transparency and shared responsibility through effective communication.

When reflecting on this you should consider clearly defining roles and maintaining effective communication. The following prompts are designed to help you evaluate your current practices and identify opportunities for continuous improvement in leadership, accountability and communication.

Ask yourself	Yes	No	N/A	Required Action
Does the pharmacy team have clearly defined leadership roles (owner, superintendent, supervising pharmacist)?				
Are responsibilities for staffing decisions, risk management, and communication documented and understood by all team members?				
Is there evidence of inclusive leadership that promotes staff wellbeing, retention, and continuous improvement?				
Are staffing decisions made collaboratively and documented with input from all those in pharmacy governance roles?				
Is there a process for reviewing and resolving issues related to staffing levels, training needs, and resource allocation? Are decisions based on current service needs rather than historical levels?				
Are communication channels within the pharmacy team open, established and used consistently to share staffing decisions and updates?				
Is there a mechanism for two-way communication, allowing				

staff to provide feedback and raise concerns?				
Do those in governance roles follow up on feedback provided and demonstrate ownership of decisions?				
Are roles and responsibilities communicated clearly to all pharmacy team members?				
Are safety assessment tools (e.g., traffic light systems, SOPs) used regularly to review staffing and communication effectiveness? Is there documentation of regular reviews and any required actions taken?				
Are leadership practices supporting staff wellbeing, retention, and a positive workplace culture? Is there evidence of proactive planning for busy periods and additional services?				
Are rest breaks facilitated for all staff, and is staff feedback on wellbeing considered?				



Risk management and workforce planning

Within this indicator when assessing staffing levels, you should consider contingency plans for staff absences, appropriate skill mix, staff availability, shift scheduling, and the required roles within the pharmacy team to ensure the provision of safe and effective services to patients and the public. Consideration should also be given to the provision of current and any future pharmacy services.

Ask yourself	Yes	No	N/A	Required Action
Is future workforce need forecasted, considering demographic changes, service expansion, and evolving patient needs?				
Do you actively plan for staff absences in the context of contingency planning for staff absence for example annual leave or sick leave?				
Are staff skills, knowledge, and experience considered in workforce planning and is the skill mix adequate for the provision of safe pharmacy services?				
Are staffing plans reviewed and adjusted proactively rather than reactively?				
Is staff availability and shift planning (including overlapping shifts and rest breaks) sufficient to ensure safe and effective operations? Consideration should also be given to the provision of rest breaks for pharmacists working in the pharmacy.				
Are staff roles, responsibilities, and professional cover clearly identified and risk-assessed? The pharmacy owner and superintendent pharmacist must make a risk-based decision regarding the level of professional cover provided by the supervising pharmacist in				

the pharmacy to ensure they are in 'whole-time charge' ³ .				
Within the pharmacy team, are staff roles, responsibilities, and professional cover clearly identified and risk-assessed?				
Are gaps in skill mix or staffing identified and addressed through recruitment or training?				



Competence, integrity and staff development

Maintaining a competent and skilled pharmacy team is essential for the provision of pharmacy services. Within this indicator, the self-assessment highlights the need for ongoing training, regular assessment of staff competence, and a strong focus on professionalism and integrity.

Ask yourself	Yes	No	N/A	Required Action
Are all pharmacy staff appropriately qualified and competent for their roles? Are staff regularly assessed for their knowledge, skills, and ability to deliver safe, high-quality care?				
Are staffing decisions made with patient safety as the priority, rather than commercial considerations?				
Do all pharmacy staff consistently demonstrate professionalism, ethical behaviour, and integrity in their interactions with patients and colleagues?				
Is there a mechanism or procedure to report and address breaches of professional standards?				
Are all pharmacy team members provided with				

³ Further information on 'whole-time' charge is available in the [PSI Guidelines on Pharmacy Governance Roles | PSI](#)

ongoing training and development opportunities?				
Does the pharmacy team receive dedicated time to support their continuing professional development (CPD) or participate in training activities?				
In accordance with all staff role profiles/responsibilities, are training needs reviewed regularly and addressed appropriately?				
Are staff performance and development regularly evaluated? Is there a structured process for evaluating staff performance and development, including the identification of areas for improvement?				
Where required, are action plans developed and tracked for staff who need additional support or training?				



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