
Mental Health Commission: Public consultation on the draft National Standards for Child and Adolescent Mental Health Services (CAMHS)

The Pharmaceutical Society of Ireland (PSI) as the independent statutory regulator of pharmacists and pharmacies in Ireland, welcomes the opportunity to respond to the Mental Health Commission public consultation to inform the development of draft National Standards for Child and Adolescent Mental Health Services (CAMHS).

We consider that the draft National Standards for CAMHS clearly set out the expectations of service providers in ensuring the delivery of safe and high-quality care to children and young people using CAMHS.

In particular, we welcome the inclusion of safe medication management in standard statements 2.5, 2.6 and 2.7 and the reference in feature statement 2.7.3 to the pharmacist being part of the multidisciplinary team delivering care and treatment. In addition, we welcome the references to regular review of prescribed medication and consideration of potential risks and benefits in feature statement 5.2.4, access to a pharmacist in feature statement 5.2.5, safe medication management arrangements with clear accountability and audit processes in feature statement 7.2.6 and medication governance arrangements supporting oversight and review of complex prescribing, including polypharmacy in feature statement 7.2.7.

We note, however, that the feature statements are intended as guidance and are not exhaustive and that it is not necessary for every feature statement to be in place for a service to demonstrate compliance with a standard statement.

While we acknowledge that services may require flexibility in how they achieve and demonstrate compliance while maintaining a consistent focus on the quality and safety outcomes described in the standard statements, further consideration should be given to including the requirement for pharmacists to be part of the multidisciplinary team or having access to a pharmacist within the standard statements, rather than within the feature statements. Inclusion of these requirements within the standard statements would strengthen the standards overall and ensure that all services and service users have access to dedicated pharmacist expertise to support safe and effective medicines use.

Pharmacists are highly trained healthcare professionals and have unique expertise in the safe and effective use of medicines. Pharmacists make a significant positive contribution to person-centred care through medicines counselling, providing clear and accessible information to patients on their prescribed medication, discussing side effects and treatment expectations, medication safety

monitoring, medicines reconciliation, medication review, identification and management of medicines-related risks, reducing medication errors, supporting safe and evidence-based prescribing practices and governance and audit of medication management practices. In CAMHS settings, access to pharmacist expertise can further support medicines optimisation, the review of complex prescribing and polypharmacy, and multidisciplinary decision-making regarding the safe and effective use of psychotropic medicines. Particular attention should also be given to medicines reconciliation and communication regarding prescribed medicines during transitions of care, including admission, discharge and transfer between CAMHS and other health services.

Conclusion

PSI reiterates its support for the draft standards and welcomes the strong emphasis in the standards on safe medication management and medication governance.

PSI remains available to engage further with the Mental Health Commission should you have any queries in respect of this submission or should you require any further input or support from PSI as part of the development and implementation of the standards.

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