

FORSA

N.A.H.P.T.



30 YEARS WITHOUT REVIEW: **Seeking Statutory Regulation for Hospital Pharmacy Technicians in the Republic of Ireland**



Contents

Acknowledgements	2
Glossary	2
Executive summary	3
Introduction	4
Responsibilities of Hospital Pharmacy Technicians in the Irish health service	5
Timeline of role development and advocacy for regulation	6
Integrated healthcare and changing structures of Hospital Pharmacy teams	7
Benefits of regulation with PSI	8
International advancements in Pharmacy Technician practice	10
The impact of statutory regulation in Great Britain	10
A win for statutory regulation in Northern Ireland	10
Regulation of Pharmacy Technicians in Canada	11
Regulation and training in the United States	11
Conclusion	12
Appendices	13
Appendix 1: Testimonials of support for statutory regulation	13
Appendix 2: Annual Report to NAHPT AGM	16
Appendix 3: Survey results of the joint Fórsa/NAHPT survey on registration 2023	19
References	20



Acknowledgements

Fórsa: Linda Kelly
National Secretary - HSCP,
Pharmacy and Statutory Regulation
Kevin O'Donoghue
Director of Campaigns Unit
National Health Office Team
Health and Welfare Divisional Executive Committee

NAHPT: Officers:
Leonor O'Connor
Grace Doyle
Rebekah Corrigan
Louise Hunt
General Committee:
Gillian Cawley
Rosemary Dwyer
Ciara Floody
Cillian Floody
Tara Hayden
Laura Lyons
Carol Murphy
Carol McCabe

Author: Juliette Cooper
Policy Officer, Fórsa trade union

Glossary

ASHP	American Society of Health-System Pharmacists
DOH	Department of Health
GPhC	General Pharmaceutical Council
HPAI	Hospital Pharmacists Association of Ireland
HSE	Health Service Executive
IloP	Irish Institute of Pharmacy
IPU	Irish Pharmacy Union
NAHPT	National Association of Hospital Pharmacy Technicians
PEBC	Pharmacy Examination Board of Canada
PSI	Pharmaceutical Society of Ireland
PTCB	Pharmacy Technician Certification Board

Executive summary

In this comprehensive position paper produced by Fórsa Trade Union in collaboration with the National Association of Hospital Pharmacy Technicians (NAHPT), we explore the critical issue of statutory regulation for Hospital Pharmacy Technicians, and its implications in the Republic of Ireland. Hospital Pharmacy Technicians are highly skilled healthcare professionals who shoulder a diverse array of responsibilities, ranging from compounding chemotherapy drugs to counselling patients on medication. Their role within a pharmacy care team working alongside Pharmacists, is centred on ensuring the highest standards of medication safety for patients.

Despite their pivotal role, the lack of an official definition and regulatory framework for Hospital Pharmacy Technicians in the Republic of Ireland is glaring. While NAHPT and Hospital Pharmacy Staff collaborate with select educational institutions to shape and assess Pharmacy Technician programmes, the absence of statutory regulation means that there is no standardised benchmark for education and training across all institutions in the country. This gap leaves the profession without a protected title, coordinated professional development, consistency in the quality of care, and career progression prospects.

As Ireland's healthcare landscape evolves with integrated care reforms which delegate clinical responsibilities to a wider range of healthcare professions beyond doctors and nurses, the Hospital Pharmacy Technician role becomes increasingly autonomous. In this context, regulation is essential to maintain consistent high standards in their practice.

The inclusion of Pharmacists in the critical skills list in 2022 underscores the acute shortage and strain on pharmacy care teams. Struggles with Pharmacist staffing is leading to Hospital Pharmacy Technicians being asked to assume expanded roles with minimal supervision. Additionally, the ongoing pressure on the Irish healthcare system provides no barrier to employers potentially neglecting education and training qualifications in favour of increased hiring of Hospital Pharmacy Technicians. Regulation through the PSI offers a safeguard, bestowing the Hospital Pharmacy Technician role with the status of a protected title, ensuring stability, standardising education, and upholding high care standards expected by patients.

As advocates and union representatives for Hospital Pharmacy Technicians, we assert that the Minister of Health must urgently propose legislative amendments to the Pharmacy Act of 2007 to encompass Hospital Pharmacy Technicians within the PSI's regulatory purview, mirroring the regulation of Pharmacists. Such alignment under a common code of ethics would solidify trust among employers and patients in the quality of care provided by Hospital Pharmacy Technicians. The impending healthcare changes under Sláintecare reform, coupled with the diverse demands of an aging population, and the restructuring of the Hospital Pharmacist role, necessitates a re-evaluation of the Hospital Pharmacy Technician role. Astonishingly, the career structure for this role has remained largely unchanged since the creation of the senior grade in 1994, a lapse of nearly three decades that compromises both the skilled professionals operating in this capacity and the service users relying on their expertise.

Our call for regulation is supported by a wide list of stakeholders from within the health sector and academia which serves as reinforcement of the vital benefits regulation can provide (see appendix 1).

**Fórsa calls
on the Minister for
Health to make the
necessary legislative
amendments to
introduce statutory
regulation for
Hospital Pharmacy
Technicians**

Introduction

"I fully support development of Pharmacy Technician roles. Regulation would be an important component of progressing and implementing more senior and management roles and novel developments for Pharmacy Technicians to optimise skill mix for pharmacy services..."

Muriel Pate, Chief II Pharmacist, HSE Acute Operations.

Hospital Pharmacy Technicians are skilled healthcare professionals responsible for a large remit of healthcare services. Some of their key responsibilities involve, but are not limited to, compounding chemotherapy drug treatments, administering to and counselling patients on drug treatments, managing hospital budgets for procurement, monitoring the use of regulated medications, reconstituting vaccines, and more (see page 5). Hospital Pharmacy Technicians operate in a pharmacy team alongside Pharmacists. The goal of this team is to ensure that each patient is provided with the highest level of medication safety. This pharmacy team is further part of a multi-disciplinary team within each hospital with a collective goal of maintaining the highest standards of patient safety.

Yet, in the Republic of Ireland there is no official definition for the Hospital Pharmacy Technician role and no official regulation of education and training. While NAHPT and Hospital Pharmacy staff coordinate with some higher and further education institutions to design and review curriculum for Pharmacy Technician programs, like the Technological University of Dublin and SETU Carlow, lack of statutory regulation means there is no guaranteed standard for education and training across all institutions in Ireland. This deprives the profession of a protected title, coordinated continuing professional development, consistency in quality of care, career advancement, and career structure reviews alongside Pharmacists. As the Irish health service moves forward with integrated care reforms that allocate more clinical responsibilities outside of the doctor and nurse professions, the Hospital Pharmacy Technician role is developing into an autonomous position that requires regulation to maintain consistent high standards of operation and care.

As the union representing Hospital Pharmacy Technicians, Fórsa, in collaboration with NAHPT, argue that the Minister of Health must submit legislation to amend the Pharmacy Act of 2007 to include Hospital Pharmacy Technicians so that they may finally receive regulation under the PSI, which regulates Pharmacists. Operating under the same code of ethics will reinforce employer and patient trust in the quality of care that Hospital Pharmacy Technicians currently provide. The imminent and significant changes under Sláintecare reform, diverse healthcare demands of an aging population, and restructuring of the Hospital Pharmacist role should logically result in the evaluation of the Hospital Pharmacy Technician role in Ireland. Since the senior grade for Hospital Pharmacy Technicians was created 1994, little review of the career structure for the role has occurred. Nearly 30 years without proper consultation and change is unacceptable for both the skilled staff that operate in this role and the service users who rely on them.

In 2022, Pharmacists were added to the critical skills list, meaning severe staff shortages for the profession threaten the basic operating capabilities of the Irish health service¹. The pressure to meet service demands under Pharmacist staffing strains has resulted in Hospital Pharmacy Technicians being asked to continue to expand their role under minimal supervision. Additionally, as strain on the Irish health service continues, there is nothing preventing employers from disregarding education and training qualifications to increase hiring of new Hospital Pharmacy Technicians. Regulation through the PSI ensures that the role of Hospital Pharmacy Technician becomes a protected title with all the stability, education, and high standards of care expected by service users.

1 Department of Enterprise, Trade, and Employment (2022) *Critical Skills Occupation Lists*, available at: Critical Skills Occupations List - DETE (enterprise.gov.ie).

Responsibilities of Hospital Pharmacy Technicians in the Irish health service



"I monitor and track plasma/blood products usage, process invoices to ensure the correct pricings are applied, and identify transcription errors on patient requisition records".



"I am regularly responsible for compounding lifesaving chemotherapy treatments and reconstituting vaccines to keep the Irish population healthy and safe".



"I dispense medicines, conduct medicines reconciliation, and control purchasing and procurement of medications, including HSE budget maintenance. I am also responsible for navigating current drug shortages".



"I am responsible for patient counselling on medications, and administration, record keeping, and monitoring of regulated drugs under the Misuse of Drugs Act".



"I assist in the training of new Hospital Pharmacy Technicians and Pharmacists on the Pharmacy team to ensure smooth operating procedures".

Timeline of role development and advocacy for regulation

The Pharmacy Technician role and education course began in 1985 in response to changing clinical demands and new expectations for Pharmacists. While Pharmacy Technicians were originally trained for community-based work, demand for Hospital Pharmacy Technicians quickly developed and in 1988 they received a recognised grade in the Irish health service hospital setting. The senior grade was established in 1994. However, in the last three decades the scope of the Hospital Pharmacy Technician role has increased dramatically, while education and training remain largely unstandardised. A report written by NAHPT in 2021 demonstrates the breadth of both technical and theoretical knowledge now expected of Hospital Pharmacy Technicians in many role specs (appendix 2).



NAHPT has engaged with the PSI about regulation for nearly two decades. In 2006, NAHPT advocated for the inclusion of Pharmacy Technicians in the Pharmacy Act of 2007. In 2009, they approached PSI again to discuss regulation and conduct an evaluation of the current training programs for Pharmacy Technicians in the Republic of Ireland. Initial collaboration with the PSI was well received, and the review of Pharmacy Technician training programs was conducted and submitted to the PSI in 2010. In 2013, the PSI included Pharmacy Technicians in their corporate strategy for professional guidance for 2013-2017. However, after 2017 Pharmacy Technicians were removed from the PSI's corporate strategy and engagement ceased as Pharmacy Technicians were not mandated as part of the PSI regulatory purview in the Pharmacy Act of 2007. The PSI denied NAHPT's request for the education course review results via the freedom of information act in 2018 by citing collation time. However, in September of 2023 the PSI published its first comprehensive Workforce Intelligence Report, which ultimately recommends that it is time to consider regulation for Pharmacy Technicians in order to improve their scope of practice and relieve pressures contributing to Pharmacists leaving the practice.

In 2021, NAHPT conducted a survey of its members to determine if they were in favour of regulation, with 94% of respondents voting yes. Unfortunately, multiple attempts to seek regulation under PSI were shut down due to the lack of legislative justification. Between December 2019 and August 2023 alone, the HSE added 156 Whole Time Employment (WTE) Pharmacy Technicians to its staff, an increase of 38.9% in four years². As Hospital Pharmacy Technicians are asked to expand their service remit, it is pertinent that the Minister of Health submit legislation to amend the Pharmacy Act of 2007 to include Hospital Pharmacy Technicians. Failure to do so will continue the unacceptable pattern of denial of engagement for progression, and again may result in the elimination of prior education and training requirements by employers as the pressure to meet demands in our health service increases.

² Health Service Executive (2023) Health Service Employment Report; August 2023, available at: <https://www.hse.ie/eng/staff/resources/our-workforce/workforce-reporting/employment-reports.html>

Integrated healthcare and changing structures of Hospital Pharmacy Teams

“On behalf of the Hospital Pharmacists Association (HPAI) I would like to express support for the regulation of Hospital Pharmacy Technicians... As health services in Ireland continue to advance with reform, it is essential that all members of the healthcare team are supported, enabled and effectively regulated. Professional regulation gives assurance that patients receive care from individuals who have met standards in ethics, education and training, conduct, performance and health. It also allows for professional accountability and a process for taking remedial action if needed...”

Richard Sykes, President, Hospital Pharmacists' Association of Ireland.

Implementation of an integrated healthcare structure in the Republic of Ireland provides an opportunity to evaluate and regulate the Hospital Pharmacy Technician role as it develops into a more autonomous profession. Sláintecare, the ten-year multi-party framework to actualise integrated care, requires radical transformation of our current health delivery system, bringing many services out of the acute care setting. This is done by simultaneously increasing our reliance on other healthcare professions for clinical work, like Hospital Pharmacy Technicians.

On April 18th, a delegation from the Irish Pharmacy Union (IPU), including IPU President Dermot Twomey, spoke to the Oireachtas joint committee on health about the state of pharmacy in Ireland. The IPU reported that the Pharmacist shortage is largely attributed to burnout associated with onerous administrative demands that are slowing down patient care³. Twomey highlighted that the significant role of Pharmacists in Sláintecare reforms require stronger investment in the entire pharmacy care sector, like digitisation, emergency shortage protocols, and pay reviews⁴.

The IPU was well received by the Oireachtas joint committee on health, yet questions remain about how changing demands and career structures for Pharmacists are affecting Hospital Pharmacy Technicians. As the next line of service in providing patient care, Hospital Pharmacy Technicians are increasingly asked to take on more clinical and autonomous responsibilities within the hospital setting but have received no update to their career structure since 1994, despite the profession advancing internationally. Evaluating Pharmacists roles without the context of the entire Pharmacy care team could lead to breakdowns in communication and cohesive working structures, ultimately affecting patient care.

Integrated health care emphasises the importance of patient-centred care, which involves considering the patient's needs and preferences when making treatment decisions. As a result, Hospital Pharmacy Technicians are working more closely with patients to help them understand their medications, potential side effects, and other important information, in addition to operating more autonomously over medication preparation. Furthermore, as ehealth systems are rolled out, like digital prescriptions, automated dispensing systems, and electronic health records, Hospital Pharmacy Technicians must adapt to new technologies and processes, requiring ongoing training and development that is not currently provided on a coordinated basis.

Without legislation to mandate regulation with the PSI, Hospital Pharmacy Technicians will continue to be forced to expand their remit to meet service demands, without the promise of consistent education and training support that registered professions are guaranteed. Regulation with the PSI will protect the profession, improve patient care, and give hiring managers an assured standard of training when seeking Hospital Pharmacy Technicians.

3 O'Connor, W. (2023) "Red tape in state schemes 'behind pharmacist burnout'", Independent.ie, 23 April, available at: <https://www.independent.ie/irish-news/red-tape-in-state-schemes-behind-pharmacist-burnout/42444897.html>

4 Irish Pharmacy Union (2023) Oireachtas Joint Committee on Health 8 March 2023. Available at: <https://ipu.ie/news-and-publications/lobbying/lobbying/joint-oireachtas-meeting-on-health-8-march-2023/#:~:text=A%20delegation%20from%20the%20IPU%20including%20Dermot%20Twomey,make%20to%20the%20development%20and%20future%20of%20healthcare>

Benefits of regulation with the PSI

“(Regulation) will allow our profession to progress. Even though we are working in all areas of pharmacy at high levels, ie procurement, development of PPPGS , and Aseptics. there is no recognition for the work we carry out. (Regulation) will allow us to access continuing professional development, which will enrich our roles and give more respect to the role of a Pharmacy Technician.”

Hospital Pharmacy Technician, NAHPT.

In a short survey conducted by Fórsa and NAHPT, Hospital Pharmacy Technicians were asked about their professional experience, perceptions of their role, and their thoughts on regulation. See appendix 3 for a full breakdown of results. 50% of respondents indicated that they had been in the Hospital Pharmacy Technician role for ten years or more, and 82% of respondents felt that opportunities for career progression in their role do not exist in the Irish health service. This lack of career advancement is proven in the fact that only two grades have existed for Hospital Pharmacy Technicians in the HSE since 1994, one basic grade, and one senior grade⁵.

The absence of thorough evaluation of the Hospital Pharmacy Technician role for over three decades hinders future take up of the profession, and without NAHPTs efforts to coordinate education and training programs, maintaining current high levels of care and operational capacity would be impossible. The PSI's recent Workforce Intelligence Report also recommends that it is time to consider regulating Pharmacy Technicians and implementing a national workforce plan for the profession to improve current scopes of practice and better plan for the future. If dependence and expansion of the role is to continue, it is time for the Minister for Health to work with Fórsa, NAHPT and other relevant stakeholders to legislate for regulation.

Key advantages of regulation with PSI

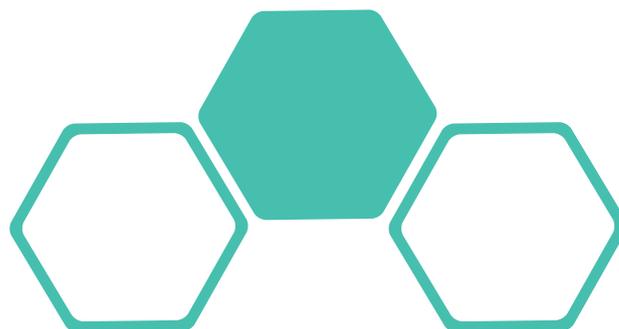
- Single standard of education for Ireland informed by experienced professionals
- Guarantee of fitness to practice with a clinical governance structure
- Increase in accountability, protection of the public from unqualified practitioners
- Protection of title
- Operate under the same code of ethics as Pharmacists
- Standard with which to screen job applicants and maintain competent staff as an employer
- Access to coordinated continuing professional development that increases skillsets
- Structure for better career evaluation and specialisations
- Encourages future take up of profession and better manpower planning

⁵ Health Service Executive (2023) Pharmaceutical Technicians, Eligibility Criteria, available at; <https://www.hse.ie/eng/staff/jobs/eligibility-criteria/pharmaceutical-technicians-.html>

Reforming the practice of pharmacy must include evaluation and change for every role in the field to create a coordinated approach to professional growth and improvement of service. Regulating Hospital Pharmacy Technicians under the PSI is the most effective way to achieve the benefits to patients, employers, and the profession, which have been demonstrated internationally over the last 15 years.

PSI Workforce Intelligence Report recommends regulating Pharmacy Technicians

- In September of 2023, the PSI published its first ever Workforce Intelligence Report. The report's overarching objective is to comprehensively assess the potential challenges and opportunities facing the pharmacy workforce in Ireland. It places specific emphasis on ensuring the sustained availability of pharmacists in patient-facing roles as recruitment and retention continue to pose risks to the future of the profession.
- Consultations were held with relevant healthcare stakeholders and the project involved a literature review of the current discourse on pharmacy care and future sustainability, a workforce survey with over 1200 respondents in the community and hospital settings, and focus groups. A working group comprised of a variety of healthcare and government stakeholder representatives from the DOH, HSE, IPU, HPAI, IloP, Schools of Pharmacy and Affiliation for Pharmacy Practice Experiential Learning, Pharmacists in Industry, Education and Regulatory and a practising Pharmacist, were involved in evaluating the project outputs and identifying recommendations for change.
- The key findings from the workforce survey and focus groups illustrate stress, burnout, staff shortages, onerous administrative and dispensing burdens, and lack of clear career progression structure for Pharmacists as some of the main drivers of recruitment and retention challenges.
- Both the focus groups and the working group conclude that regulation for Pharmacy Technicians must be considered to improve current challenges exacerbating staff shortages for Pharmacists. The working group also recommended that a national strategy for the future of the Pharmacy Technician profession should be put in place to evaluate their current scope of practice and enable better workforce planning.
- These recommendations further demonstrate that statutory regulation for Pharmacy Technicians is the next step to bringing Irish healthcare services in line with international best practice and align with Fórsa and NAHPT's arguments for regulation.



International advancements in Pharmacy Technician practice

The impact of statutory regulation in Great Britain

In Great Britain, Pharmacy Technicians play a crucial role in the delivery of healthcare services in the NHS. As such, regulation of Pharmacy Technicians is extremely important, both to ensure patient safety and to support the professional development of Pharmacy Technicians. The General Pharmaceutical Council (GPhC) is the regulatory body responsible for the registration and regulation of Pharmacy Technicians in Great Britain. The GPhC sets standards for Pharmacy Technician education and training, as well as standards for conduct and practice.

Regulation for Pharmacy Technicians began on a voluntary basis in Great Britain in 2005 and became mandatory from 2011 onwards. As early as 2006, Chief Pharmaceutical Officer of the NHS (2006-2022), Dr. Keith Ridge, is quoted emphasising the need for Pharmacist and Pharmacy Technicians to collaborate professionally in the face of changing clinical demands for their positions in accordance with population needs. There are now nearly 25,000 registered Pharmacy Technicians in Great Britain.

In addition to providing a framework for ensuring patient safety, supporting professional development, and promoting public trust, regulation for Pharmacy Technicians in Great Britain has led to significant advancements in career progression opportunities that make the NHS more dynamic in tackling challenges in service delivery.

Pharmacy Technicians in Great Britain have expanded their capacity for patient care in several different ways, for example, there are specialist Hospital Pharmacy Technicians working autonomously in clinical settings to maintain anti-coagulation levels in patients, they work on district nursing team to administer medicines and conduct medication risk assessments and are often independently managing hospital dispensaries⁶.

There are also now post registration courses available to Pharmacy Technicians seeking further advance training and leadership roles⁷. Pharmacy Technicians in the NHS are also integrated into the Agenda For Change (AFC) pay scales, and therefore do not remain limited to a singular basic or senior band, better rewarding those Pharmacy Technicians who have honed their expertise in the field and desire more responsibility.

A win for statutory regulation in Northern Ireland

In March of 2022, the Department of Health in Northern Ireland launched a consultation of Pharmacy Technicians to determine their support for statutory regulation. The consultation ran for eight weeks and concluded in May 2022, with 80% of participants reporting that they are in favour of regulation for their profession.

The consultation found broad consensus for the protection of title, minimum education and training requirements, and patient safety that regulation would bring to the profession. Most respondents also agreed that the logical regulator for Pharmacy Technicians should be the same as for Pharmacists, the Pharmaceutical Society of Northern Ireland (PSNI) to ensure that they adhere to the same code of ethics.

Did you know:

Pharmacy Technicians are regulated throughout the EU in:

Norway ▪ Slovakia ▪ Slovenia
Malta ▪ Poland ▪ Portugal ▪ Lithuania

Find out more at:
Regulated Profession Database
(europa.eu)

6 Hemsworth, Alison (2018) 'Pharmacy Technicians are playing key new roles', NHS England, 18 October, available at: <https://www.england.nhs.uk/blog/pharmacy-technicians-are-playing-key-new-roles/>

7 Hemsworth, Alison (2018) 'Pharmacy Technicians are playing key new roles', NHS England, 18 October, available at: <https://www.england.nhs.uk/blog/pharmacy-technicians-are-playing-key-new-roles/>

The Department of Health responded by welcoming the feedback from the consultation and is in general agreement with its findings, they stated its next steps are to work with the PSNI to create a framework for regulation and registration of Pharmacy Technicians in Northern Ireland.

Regulation of pharmacy technicians in Canada

In Canada, Pharmacy Technicians are integral members of the healthcare team, responsible for various tasks related to medication preparation, dispensing, and management. Pharmacy Technicians are expected to work collaboratively with pharmacists, other healthcare professionals, and patients to ensure the safe and effective use of medications.

Pharmacy Technician regulation is primarily governed by provincial regulatory authorities, which are responsible for licensing, setting standards, and overseeing practice. Each province has its own pharmacy regulatory body, such as the Ontario College of Pharmacists, the College of Pharmacists of British Columbia, or the Alberta College of Pharmacy.

The Pharmacy Examining Board of Canada (PEBC) is a national certifying body which assess qualifications for Pharmacy Technicians and Pharmacists for participating provinces, such as Alberta, Manitoba, and Ontario. Passing PEBC exams is often a prerequisite for licensing in participating provinces⁸.

To stay current with evolving pharmacy practices and healthcare trends, Pharmacy Technicians are required to engage in ongoing professional development. Most provincial regulatory bodies mandate continuing education requirements, which may include attending workshops, seminars, or courses relevant to their practice.

In recent years, the role of Pharmacy Technicians in Canada has expanded beyond traditional dispensing functions. Some provinces have allowed Pharmacy Technicians to take on more responsibilities, like administering vaccines, conducting medication reviews, and providing education to pharmacy teams⁹. These expansions in scope of practice are closely monitored by the regulatory bodies to ensure safety and competence. By ensuring that Pharmacy Technicians meet stringent standards, Canada's regulatory framework contributes to the overall quality and safety of pharmaceutical care in the country.

Regulation and training in the United States

Regulation and registration of Pharmacy Technicians in the United States varies by state. National certification through the Pharmacy Technician Certification Board (PTCB) is required by 21 states and accepted in all 50 states. 45 out of 50 states require Pharmacy Technicians to be locally registered and licensed with their respective State Board of Pharmacy to practice¹⁰. Despite varying state systems, coordination with Pharmacist regulatory bodies is required in nearly all states, treating the practice of pharmacy as a unit to progress cohesive best practice.

The American Society of Health-System Pharmacists (ASHP) is the largest association of pharmacy professionals in the United States representing both Pharmacists and Pharmacy Technicians. They represent pharmacy teams in diverse patient care settings in the community and hospital sectors. Advocacy, professional development, and training and education are the main objects of ASHP, and they are the main accrediting body for Pharmacy Technician training programs in the United States¹¹. Their accreditation ensures that Pharmacy Technicians and Pharmacists operate under the same code of ethics and best practice so that pharmacy teams can provide excellent patient care and advance their professions collectively.

8 Pharmacy Examination Board Canada (2023) About PEBC, available at: <https://pebc.ca/about-pebc/>

9 Alberta College of Pharmacy (2022) *Practice and beyond: the roles of pharmacy technicians*, available at: <https://abpharmacy.ca/full-scale/practice-and-beyond-roles-pharmacy-technicians>

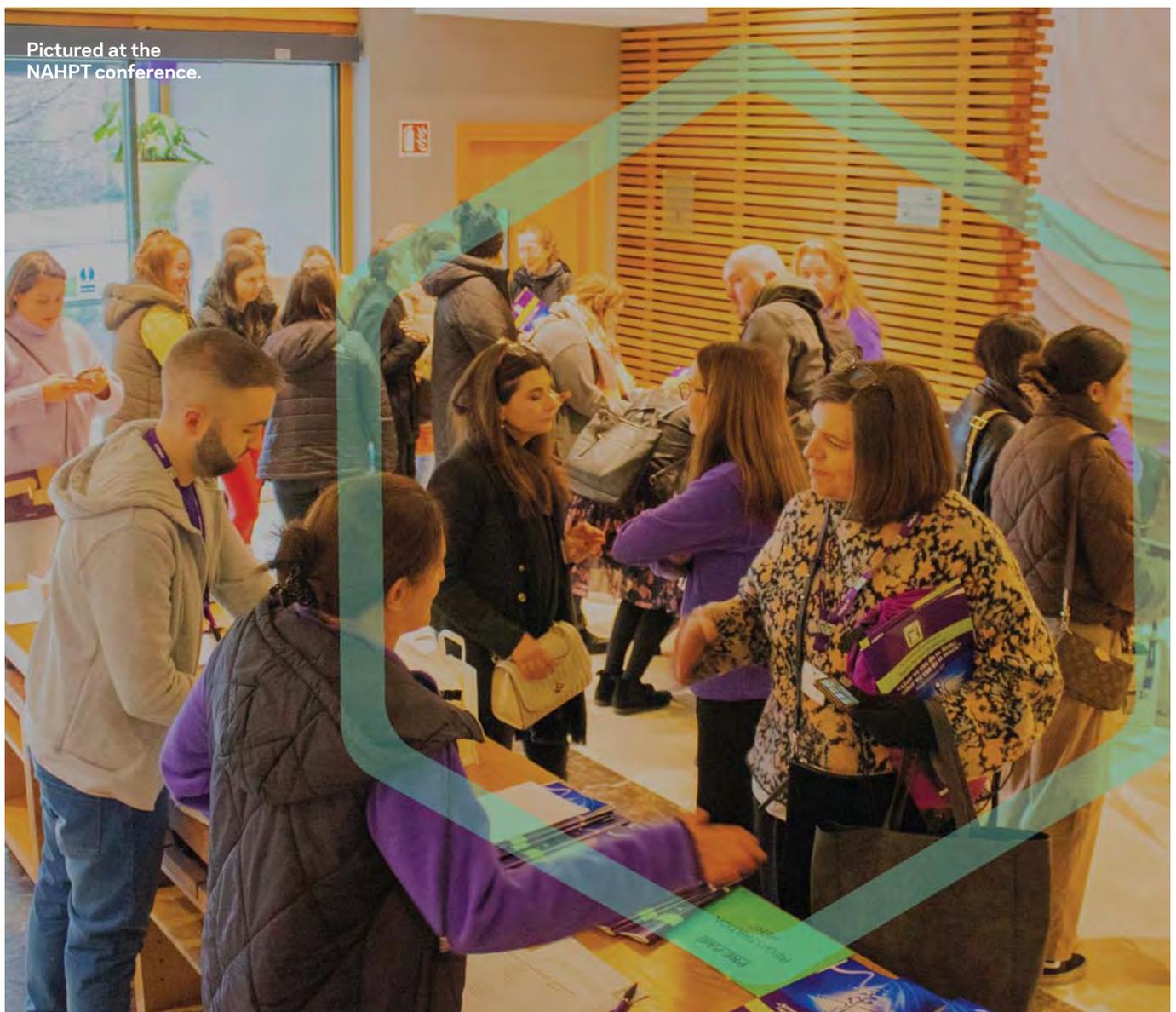
10 Pharmacy Technician Certification Board (2023) State Regulations and Map, available at: <https://www.ptcb.org/resources/state-regulations-and-map>

11 American Society of Health-Systems Pharmacists (2023) Technician program Accreditation, available at: <https://www.ashp.org/professional-development/technician-program-accreditation?loginreturnUrl=SSOCheckOnly>

Conclusion

Hospital Pharmacy Technicians have gone nearly 30 years without proper consultation and review of their role. Without the collective bargaining efforts of unions and organisations like NAHPT which coordinate with institutions to ensure that education and training standards remain up to date on best practice, Hospital Pharmacy Technicians could not have taken on the care demands they are being asked to address in the wake of the Pharmacist shortage and needs of an aging population. However, as these diverse demands for Hospital Pharmacy Technicians continue to rise, regulation and registration with the PSI must be pursued to grant protection of title and meet Sláintecare service objectives.

Regulation supports the professional development and recognition of Hospital Pharmacy Technicians. It encourages continuous education and training, gives employers a standard by which to evaluate new professionals, and creates opportunities for advancement. This fosters a culture of continuous improvement, leading to better patient outcomes and could contribute to higher future take up of the profession that will lead to better manpower planning. Moreover, regulatory measures enhance public trust and confidence in pharmacy care teams. By having a regulatory body like the PSI overseeing the practice of Hospital Pharmacy Technicians, patients can be assured that they are receiving care from qualified professionals all operating under the same code of ethics and best practice. Thus, Fórsa and NAHPT urge the Minister to draft amended legislation for the Pharmacy Act of 2007 that will grant Hospital Pharmacy Technicians statutory regulation under the PSI without delay so that both Hospital Pharmacy Technicians and the public may benefit from the advantages outlined in this position paper.



Appendix 1: Testimonials of support for statutory regulation

Dr Tao Zhang

**Programme Chair of Higher Certificate in Science in Pharmacy Technician Studies
Technology University Dublin (Grangegorman)**

I would absolutely support the establishment of Hospital Pharmacy Technicians as a regulated healthcare profession in Ireland.

The pharmacy sector plays a critical role in public health nationally and globally. The increased roles and responsibilities for Pharmacy Technicians have become essential in the day-to-day successful operations of pharmacies and/or pharmacy department in hospitals. Hospital Pharmacy Technicians are a vital asset in delivering healthcare and helping the public and patients to manage and improve their health, safety and wellbeing. This has especially been proven throughout the Covid-19 pandemic.

Regulation of Hospital Pharmacy Technician would allow the regulator to strengthen the Technician's role in delivering safe and effective healthcare, protecting the public and patients, maintaining and promoting high standards care and services, and ensuring the standards are met at all times; consequently, increasing the public's and patient's confidence and trust in pharmacy practice. From qualification point of view, regulation of Hospital Pharmacy Technician would allow education and training to be standardised across the various programme providers in the country. Thus, the education and training of scientific knowledge, skills, attributes, and professional practice (attributes and behaviours) can be delivered consistently following the same standards in the country. All Pharmacy Technician students/trainees can also use the regulation/standards to reflect what is a professional Hospital Pharmacy Technician throughout the process of their initial education, registration, and renewal, and to maintain fitness to practice and remain registered.

Richard Sykes

President

Hospital Pharmacists' Association of Ireland

On behalf of the Hospital Pharmacists Association (HPAI) I would like to express support for the regulation of Hospital Pharmacy Technicians.

Hospital Pharmacy practice and the demands placed on services and individuals have developed massively over the last 30 years. The role of the Hospital Pharmacy Technician has evolved over this time with increased responsibility, scale and scope becoming the norm. Pharmacy Technicians are key members of the healthcare team and can be found working across the health services working to provide safe, efficient medicines use.

As health services in Ireland continue to advance with reform, it is essential that all members of the healthcare team are supported, enabled and effectively regulated. Professional regulation gives assurance that patients receive care from individuals who have met standards in ethics, education and training, conduct, performance and health. It also allows for professional accountability and a process for taking remedial action if needed.

Statutory regulation would address many of these challenges and would be beneficial for patients, health systems and Pharmacy Technicians alike.

Ian Lindsley

Secretary

European Biosafety Network

I have worked on pharmacy related issues both at the European level and in various countries across Europe and in each of them Pharmacy Technicians have supported and been active in promoting worker safety and given their crucial role in delivery patient care safely should have the same status as their Pharmacist and nursing colleagues and have both proper regulation and proper education and qualifications recognised by the health system in Ireland and in other countries.

Muriel Pate
Chief II Pharmacist, HSE Acute Operations
HSE

I fully support development of Pharmacy Technician roles. Regulation would be an important component of progressing and implementing more senior and management roles and novel developments for Pharmacy Technicians to optimise skill mix for Pharmacy services.

There is currently wide variation in roles undertaken by Pharmacy Technicians in different hospital pharmacy departments. This arises from variation in what developments different Chief Pharmacists will support and lack of regulation is a key part of the reason for this variation.

There would be benefits to staff recruitment and particularly to retention of experienced staff. It would help to ensure a more consistent hospital pharmacy service for patients in different hospitals nationally. Recent regulation of Pharmacy Technicians in the UK and specifically in Northern Ireland provides a useful model.

Bernie O'Reilly
Member
Patients for Patient Safety Ireland

As a member of the public and a potential patient I would expect Hospital Pharmacy Technicians to be professionally regulated as they perform duties which influence patient safety, and are the hidden workforce supporting and enabling our Pharmacists.

Dr Eileen Relihan
Medication Safety Facilitator
St. James's Hospital

I would be strongly in favour of professional regulation for Hospital Pharmacy Technicians. Such regulation would provide assurance of quality and consistency in terms of the standards of education, training and continuing professional development of Technicians. This development would be a significant step forward in supporting hospitals to deliver best practice standards in relation to medication safety in Ireland. The expertise of staff which have been trained to consistently high standards in medication management is greatly needed in the hospital environment of ever-increasing volume and complexity of medicines, aging patient population with multiple co-morbidities, and shortage of staff across all disciplines.

Patricia Heckmann
Assistant National Director
National Cancer Control Programme

Regulation would promote high standards of professional conduct by ensuring consistency in education and training and competencies. This in turn will ensure patient safety. Regulation should also allow for standardisation of expanded roles. This should improve recruitment and retention of Hospital Pharmacy Technicians and improve the overall pharmaceutical service at hospital level.

Nicola Cantwell
Work Placement Coordinator and Assistant Lecturer
Clinical Governance Pharmacist
SETU (Formerly IT Carlow)
Caredoc GP Out of Hours Service

Pharmacy Technicians are an essential part of every Pharmacy team across the health care services. If we are serious about expanding the role of Pharmacy in multidisciplinary teams then we must work to ensure that Pharmacy Technicians are given the opportunity to become registered healthcare professionals in their own right. As an educator and a pharmacist, I am fully aware of the work Pharmacy Technicians do and support this campaign 100%.

Yvonne Sheehan
Senior Pharmacy Technician
HSE Acute Hospitals Drugs Management Programme

I fully support the campaign for the statutory registration and regulation of Hospital Pharmacy Technicians. This will bring Hospital Pharmacy Technicians in line with the UK, Europe, and many other countries worldwide. Regulation will support the visa registration process for non – Irish qualified Pharmacy Technicians in applying for visas to permit them to work in Ireland. It will also support us in assessing non-Irish qualifications.

The patient is at the centre of all the services we provide and regulation we ensure that we meet the standards to provide the service they expect and deserve.

João José Joaquim
Adjunct Professor at Coimbra Health School - Polytechnic University of Coimbra
Former President of the European Association of Pharmacy Technicians
European Association of Pharmacy Technicians (EAPT)

The evolution and progress of knowledge in health sciences, in general, and in pharmaceutical sciences, in particular, has led to the development of new skills, and greater professional responsibility and autonomy. Linked with this evolution and progress the pharmacy professions represent, today, the unequivocal expression of the dizzying evolution of pharmaceutical sciences, in its technical, scientific, cultural, humanistic, and sociological components. This technical, scientific, and humanistic evolution of health science and technology professions eventually resulted in new needs, whether in the field of professional training or in the regulation of professional practice. It is, therefore, expected, and above all desirable, that there is effective professional regulation for these professions as it is recognised that their absence and, in particular, the non-existence or ineffectiveness of mechanisms for supervision and discipline of professional practice unprotects the citizens and, ultimately, puts public health at risk. However, in the case of pharmacy technicians, unlike what happened in the field of education and training where the progress achieved is evident, the panorama regarding the regulation of professional practice is admittedly insufficient. So, the need to raise the level of training of these professionals was a mere corollary of the growth of health technology sciences. As with other health professions whose purpose is to promote and protect human health and prevent disease, it is important to ensure that the regulation of professional practice is subject not only to the requirement for specialised and qualified education and training, but also to the legal and regulatory provisions that frame it, and compliance with which is ensured by efficient discipline and supervision mechanisms. In effect, acting in a context of great relationship and proximity to disease contexts, it becomes necessary to guarantee mechanisms that act upstream, and in a preventive manner, so that professional practice is carried out in compliance with the best professional practices, technical and ethical standards and deontological, duly harmonised with scientific evidence, and covering all components of this professional practice, whose compliance is effectively controlled, allowing us to have instruments of action when deviations from current standards occur. In addition, when we look at Europe, we notice an evolution in the regulation of the pharmacy technician profession. **We currently have 21 countries with the profession regulated**, under Directive 2005/36/EC on the recognition of professional qualifications¹². This is important not only to enshrine the European spirit and the freedom of mobility of professionals, with gains for health systems, and for health responses to populations, but also to accommodate citizens' expectations. In the European ranking of most mobile professions, the profession of Pharmacy Technician appears in 47th place out of a total of 413 professionals, which gives an idea of the capacity and quality of training, but also of the potential that a regulated profession has in the context of mobility professional, allowing better and faster recognition of professional qualifications. It is, therefore, expected, and above all desirable, that there is an effective professional regulation for Pharmacy Technicians as it is recognised that their absence and the non-existence or ineffectiveness of mechanisms for supervision and discipline of professional practice unprotects the citizens and, ultimately, puts public health at risk. For the reasons presented, I express my support for the regulation of the profession of Pharmacy Technician in Ireland.

12 Regulated Professions Database <https://ec.europa.eu/growth/tools-databases/regprof/statistics/establishment/ranking>

Appendix 2: Annual Report to NAHPT AGM

It has been a very interesting and professionally progressive year for Hospital Pharmacy Technicians.

Pharmacy Technicians have expanded their roles particularly in the last two years and it is widely recognised that the experience they have is invaluable and a huge support to Pharmacists not only in their traditional roles but also in the development of new systems.

In order to ensure that Pharmacy Technicians are of a consistently high standard to meet the needs of the ever-expanding roles we are now involved in, it is important to ensure standards of education and training and continued professional development are high.

NAHPT would like to see the introduction of professional regulation of Pharmacy Technicians to ensure that the standard of excellence which is very often reflected in the work that we do is consistent amongst all pharmacy technicians through regulation.

We are continuing to look at our options for regulation and conducted a fact-finding exercise to ascertain the requirements for regulation. We met with Pharmacy Technician course co-ordinators, contacted professional healthcare regulators and met with the PSI registrar to assess the support for and process required to proceed with the regulation of Pharmacy Technicians. The PSI agreed that they would be the most natural fit as a pharmacy regulator for Pharmacy Technicians to be registered with as opposed to other professional healthcare regulators but at present Pharmacy Technicians are not designated for professional registration by the department of health. We therefore would need support for Pharmacy Technicians to be added to the Department of Health list of healthcare professions that require registration. We provided feedback to our members and conducted an initial Hospital Pharmacy Technician survey to establish the interest/support for registration before we pursue this challenging process any further. Although not exhaustive the initial results of the survey showed that 94% of the Pharmacy Technicians that responded are in favour of pursuing professional registration.

Some of the roles that Pharmacy Technicians are now involved in include:

Sector	Pharmacy Technician roles and responsibilities
Education: RCSI, University of Medicines and Health Sciences	<ul style="list-style-type: none">▪ Contribute to the design, development, and delivery of the school's educational programmes at both undergraduate and postgraduate levels.▪ Assisting the development, preparation, delivery, and assessment in the broad areas of pharmacy including pharmacy practice, clinical pharmacy and pharmaceuticals.▪ Work alongside academic staff, teacher-practitioners, practice educators and the technical team to ensure an authentic learning experience for students.
HSE Procurement: National Pharmacy Procurement Team	<ul style="list-style-type: none">▪ Manage tender processes for high-cost drugs.▪ Develop documentation for tender processes.▪ Qualify applications from drug companies for registration to the HSE Dynamic Purchasing System for authorised medicines.
Professional Representative Organisation: Irish Pharmacy Union (IPU)	<ul style="list-style-type: none">▪ Contract administrator.▪ Advising and assisting IPU members on the administration of the Community Pharmacy Contractors Agreement, in particular processing claims and payments, and administering the HSE community drugs schemes.

Sector

Pharmacy Technician roles and responsibilities

CPD: Irish Institute of Pharmacy (IIOF)

- Operations coordinator.
- Look after the Institute's Finance system and provide administrative support to the IIOF Team.
- Support a range of projects in the IIOF including the webinar series, the IIOF newsletter and the support helpdesk.

HSE Reimbursement: PCRS

- Processing and analysing new medicinal product applications.
- Receipt and management of Product Discontinuation Notifications and of Product Shortages Notifications.
- Co-operate with other PCRS functions (e.g., Drugs Unit, Finance, Operations) to ensure appropriate reimbursement (including governance and reporting) arrangements are in place for all medicines.

HSE: Vaccination Team

- Medicines management.
- Receipt and secure storage of vaccines.
- Distribution, workflow management and dose reconciliation.
- Validation and management of the cold chain.

HSE: National Cancer Control Programme (NCCP)

The three roles are:

1. Cancer Drug Management programme – primarily focused on the development and review of the national chemotherapy regimens as well as quality services.
 2. Systemic Therapy Programme – primarily focused on funding and audit considerations for cancer drugs including ODMS and other streams.
 3. National Cancer Information system (NCIS) – primarily focused on national regimen building for NCIS.
- The technicians play a key role within each of these small teams and their roles continue to grow and evolve in response to the service needs.

GP Out of Hours:

- Medicines management.
- Compiling stock orders of all medicines as well as dressings/ostomy products/sharps bins/PPE etc.
- Monitoring of and stocking medication bags for house calls.
- Working alongside Doctors and Clinical nurses.
- Maintenance of ECG machines and defibrillator.

Wholesale: Uniphar

- Customer service role concerned with the supply of EMP's and other procured goods.
- Customer advisory services.
- Provision of technical support.

HSE: GUIDe (Sexual Health)

- Dispensing and counselling of patients on appropriate use of ARVs, ID and STI medications.
- Medicines reconciliation DDI checking for patients.
- Maintaining stock levels for pharmacy and liaising with procurement around expected shorts.
- Liaising with Irish prison services managing ART for inmates.
- Creating reports on cost/usage.

Research: Clinical Trials

- Adhere to procedures to ensure the safe and correct ordering, receipt, recording, handling, storage, dispensing, administration, quarantining and destruction of investigational medicinal products (ATIMPS/ IMPs) including investigation and rectification of discrepancies.
- Providing technical direction and assistance with clinical trial protocols.
- Liaise with trial sponsor representatives and prepare pharmacy documentation for monitoring visits and follow up and action any monitoring visit finding.

Sector

Pharmacy Technician roles and responsibilities

Hospital: Medicines Management/Ward Based**

- Medicines reconciliation and kardex review.
- Review of drug trolleys/presses.
- Provide patient education.
- Ordering and supply of non-stock medications.
- Support audit and data collection for service-based activities.

Commercial Sales: Key Account Manager in specialised medicines, ULM supply, and medication shortages

- This position requires the Pharmacy Technician to assess the supply chains globally, review product suitability and help ensure continuity of supply.

There is a requirement to be able to:

- Maintain and develop relationships with Hospital Pharmacy Teams.
- React quickly to shortages.
- Offer solutions to supply new therapies that currently are unavailable in Ireland due to external challenges, by partnering with companies in other markets i.e Brexit, Temp Controlled Shipments.
- Managing logistics and meeting quality standards throughout.
- Identify potential critical medication unavailable in the market.

Clinical Support Specialist for a pharmaceutical wholesale business

- The focus of the role is to provide expert clinical support to the business, liaising with both internal and external stakeholders.
- The role supports the growth of the business by working with management to assess the market landscape, provide product training and demonstrations to both internal and external stakeholders, educate the business on clinical indications for both existing and new products, Review SmPC's, and Analyse clinically, market opportunities to identify gaps in the market and opportunities to optimise product portfolio.

HSE Acute Hospitals Drugs Management Programme (AHDMP)

- Role in the Hospital Medicines Management System (HMMS) project team.
- Responsible for the implementation of a national hospital pharmacy medicines management system. This is modern pharmacy software with increased functionality in key areas such systems integration, drug procurement, inventory management, ward-based activities and finance. HMMS will also become the platform to support electronic prescribing and electronic medicines in the future in Irish hospitals.
- Involved in building a drug file and supplier builds, working with pharmacy focus groups e.g., dispensary, clozapine, clinical trials to map workflows and identify how they use pharmacy software systems at present.
- Currently training on this new software and will be involved in testing before we go live as well as providing on-site support to pharmacy staff.

** This year Connolly Hospital Medicines management technician (MMT) service was shortlisted for a HSE excellence award.

The HSE excellence awards are an opportunity to showcase and celebrate the good work that is happening in the HSE every day.

The MMT service was entered under the Innovation and service delivery category and the title of project was **"Delivering safer, more cost-effective medication management through Pharmacy skill-mix innovation"**

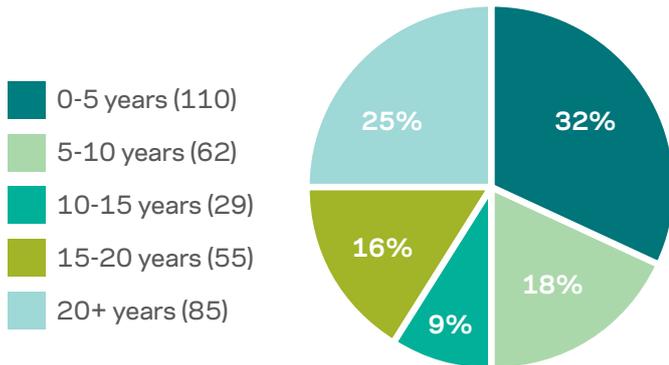
We look forward to another interesting, productive, and progressive year next year for Pharmacy Technicians.

Leonor O'Connor
President NAHPT
nahptsecretary@gmail.com
www.nahptireland.ie

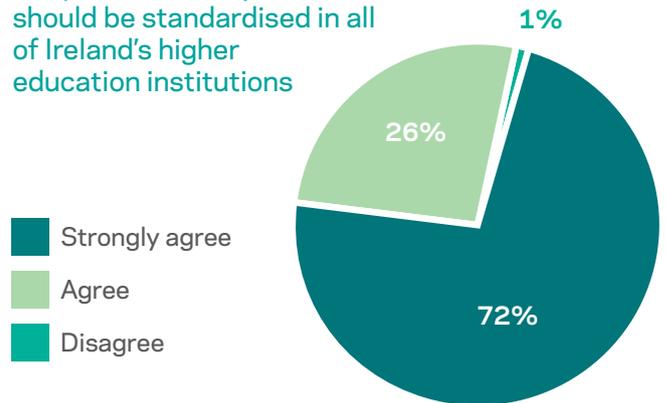
Appendix 3: Survey results of the joint Fórsa/NAHPT survey on registration 2023

Statutory regulation for Hospital Pharmacy Technicians: Survey results (341 respondents)

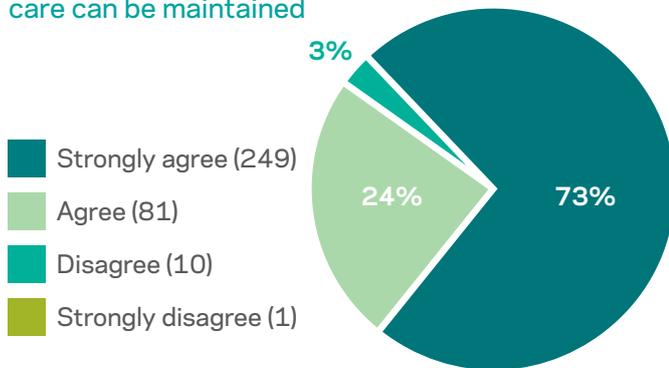
How long have you been a Hospital Pharmacy Technician?



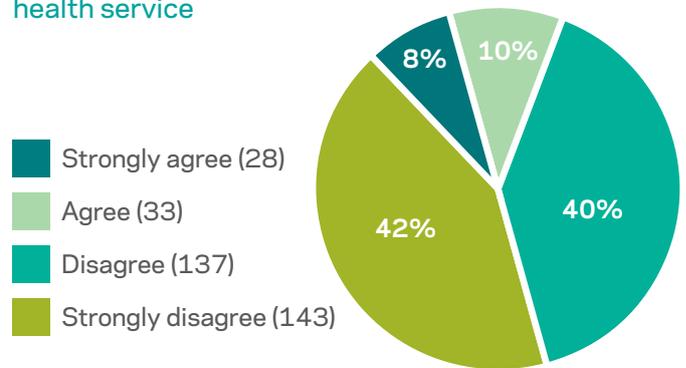
Education and training for Hospital Pharmacy Technicians should be standardised in all of Ireland's higher education institutions



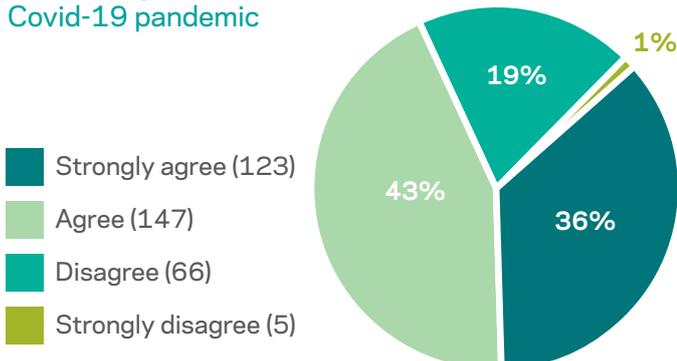
Regulating the Hospital Pharmacy Technician role will ensure that high levels of patient safety and care can be maintained



There are ample opportunities for career progression for Hospital Pharmacy Technicians in the Irish health service



The roles of expectations for Hospital Pharmacy Technicians have changed since the Covid-19 pandemic



References

- Alberta College of Pharmacy (2022) Practice and beyond: the roles of pharmacy technicians. Available at: <https://abpharmacy.ca/full-scale/practice-and-beyond-roles-pharmacy-technicians> (Accessed 25 September 2023).
- American Society of Health-Systems Pharmacists (2023) *Technician program Accreditation*. Available at: <https://www.ashp.org/professional-development/technician-program-accreditation?loginreturnUrl=SSOCheckOnly> (Accessed 10 June 2023).
- Anderson, C. D., Draime, A. J., & Anderson, S. T. (2016) 'Description and comparison of pharmacy technician training programs in the United States', *Journal of the American Pharmacists Associations*, 56(3), pp. 231-236. Available at: <https://doi.org/10.1016/j.japh.2015.11.014> (Accessed 10 June 2023).
- Department of Health (2022) *The Introduction of Statutory Regulation of Pharmacy Technician Workforce in Northern Ireland: Consultation Summary Report*. Available at: https://www.health-ni.gov.uk/sites/default/files/consultations/health/doh-statutory-reg-pharmacy-tech-workforce-consultation-report_0.pdf (Accessed 20 May 2022).
- European Commission (2023) *Regulated Professions Database*. Available at: <https://ec.europa.eu/growth/tools-databases/regprof/professions/bycountry> Accessed 9 June 2023.
- General Pharmaceutical Council (2023) *Registration*. United Kingdom: Available at: <https://www.pharmacyregulation.org/registration>
- Global Health Workforce Alliance (2010) *Mid-level health providers: a promising resource to achieve the health Millennium Development Goals*. Geneva: WHO Press. Available at: <https://cdn.who.int/media/docs/default-source/health-workforce/ghwn/2010-ml-health-providers.pdf> (Accessed 10 June 2023).
- Government of Ireland (2021) *Sláintecare Implementation Strategy & Action Plan 2021-2023*. Dublin, Ireland. Available at: <https://www.gov.ie/en/publication/6996b-slaintecare-implementation-strategy-and-action-plan-2021-2023/>
- Health Service Executive (2023) *Health Service Employment Report: August 2023*. Available at: <https://www.hse.ie/eng/staff/resources/our-workforce/workforce-reporting/health-sector-employment-report-february-20231.pdf> (Accessed 10 October 2023).
- Health Service Executive (2023) *Pharmaceutical Technicians, Eligibility Criteria*. Available at: <https://www.hse.ie/eng/staff/jobs/eligibility-criteria/pharmaceutical-technicians-.html> (Accessed 20 May 2022).
- Hemsworth, Alison (2018) 'Pharmacy Technicians are playing key new roles', NHS England, 18 October. Available at: <https://www.england.nhs.uk/blog/pharmacy-technicians-are-playing-key-new-roles/> (Accessed 10 June 2023).
- Houses of the Oireachtas (2022) *Pharmacy Services: Dáil Éireann Debate Tuesday -10 May 2022*. Dublin. Available at: <https://www.oireachtas.ie/en/debates/question/2022-05-10/687/> (Accessed 20 May 2023).
- Irish Pharmacy Union (2023) *Oireachtas Joint Committee on Health 8 March 2023*. Available at: <https://ipu.ie/news-and-publications/lobbying/lobbying/joint-oireachtas-meeting-on-health-8-march-2023/#:~:text=A%20delegation%20from%20the%20IPU%20including%20Dermot%20Twomey,make%20to%20the%20development%20and%20future%20of%20healthcare.> (Accessed 1 June 2023).
- Koehler, T., and Brown, A. (2017) "A global picture of pharmacy technician and other pharmacy support workforce cadres", *Research in Social and Administrative Pharmacy*, 13(2), pp. 271-279. Available at: <https://doi.org/10.1016/j.sapharm.2016.12.004> (Accessed 10 June 2023).
- O'Connor, W. (2023) "Red tape in state schemes 'behind pharmacist burnout'", *Independent.ie*, 23 April. Available at: <https://www.independent.ie/irish-news/red-tape-in-state-schemes-behind-pharmacist-burnout/42444897.html> (Accessed 25 May 2023).
- Pharmacy Examination Board Canada (2023) *About PEBC*. Available at: <https://pebc.ca/about-pebc/> (Accessed 25 September 2023).
- Pharmacy Technician Certification Board (2023) *State Regulations and Map*. Available at: <https://www.ptcb.org/resources/state-regulations-and-map> (Accessed 15 June 2023).
- Pharmaceutical Society of Ireland (2023) *Workforce Intelligence Report*. Available at: https://www.thepsi.ie/tns/Publications/Publications/Workforce_Intelligence_Report.aspx (Accessed 25 September 2023).
- The Pharmaceutical Society of Ireland (2013) *Corporate Strategy 2013-2017*. Available at: https://www.thepsi.ie/Libraries/Publications/PSI_Corporate_Strategy_2013_-_2017.sflb.ashx (Accessed 22 May 2023).

