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Pharmacy Council of New Zealand  
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### **Review of the “Workplace Pressures in Pharmacy” booklet and discussion document**

Thank you for inviting my comment on the Pharmacy Council of New Zealand’s booklet on “Workplace Pressures in Pharmacy” (the **booklet**), designed to set out practical advice for pharmacists (and pharmacy staff and employers) in addressing workplace pressures.

As you will be aware, I am charged with promoting and protecting the rights of health and disability services consumers, as set out in the Code of Health and Disability Services Consumers’ Rights (the **Code**). One of my functions under the Health and Disability Commissioner Act 1994 is to make public statements in relation to any matter affecting the rights of health or disability services consumers.

I am focused on encouraging health and disability service providers to strive for a consumer-centred culture, underpinned by concepts such as transparency, engagement and seamless service; all of which are supported by the various rights in the Code. Failures in those areas are recurring themes in complaints that come before me and it is therefore imperative that pharmacists understand their obligations in relation to such issues. While I recognise that the role of a pharmacist may sometimes be stressful, I emphasise that any such stress should not compromise the quality of care provided to consumers. I welcome the initiative taken by the Pharmacy Council in recognising the stressors that might arise and seeking workable solutions that promote consumer centred care and ensure that consumers are not put at risk.

From my perspective, it is encouraging to see that, in setting out solutions to deal with “workplace pressures”, the booklet reflects many of the rights encompassed in the Code. For example, the proposed solutions emphasise safe and effective service delivery (Right 4) and the importance of effective communication with consumers (Right 5) and other providers (Right 4(5)).

I also note that the booklet identifies ways to manage what are described as “psychosocial elements” in ways that reflect a focus on co-operation among pharmacists and between pharmacists and other providers, to ensure quality and continuity of services (co-operation between providers is also appropriately referenced under “professional satisfaction”). It is useful that this section of the booklet discusses the need for a “culture of openness”, including processes for raising concerns internally and learning from mistakes, as well as solutions designed to discourage the development of a “culture of blame”. I also commend you for emphasising the need for pharmacists to have transparent complaints procedures in place (Right 10).

I would also like to acknowledge the inclusion of guidance in the booklet as to managing the sometimes competing demands of commercialism and professionalism, and endorse your comment that “patient safety rather than commercialism is at the heart of pharmacy service delivery”.

Finally it is pleasing to see solutions being proposed in relation to the lack of private counselling areas in some pharmacies and your reference to the applicable Pharmacy Services Standard (that “*consumers receive services in a manner that has regard for their dignity, privacy and independence*”). Rights 1 and 3 of the Code similarly provide that consumers have the right to be treated with respect (including having their privacy respected), and the right to dignity and independence.

Given the close link between some of what is contained in the booklet and the requirements of the Code, you may wish to consider expressly mentioning the Code at appropriate points within the document. It may also be worth noting that the Code applies to individual pharmacists as well as their employers and the operators of pharmacies, all of whom have responsibilities under the Code.