



The Pharmacists' Defence Association's Further Guidance to support members providing the Flu Vaccination Service in light of serious emerging issues in service delivery.

September 2020

Context :

It is fully recognised that this year, there is a national emergency and the nations flu vaccination targets have been dramatically increased so as to prevent unnecessary hospitalisations ahead of the second wave of Covid. The 2020-2021 Flu vaccination service has now commenced and has therefore produced a huge foreseeable and predictable uplift in demand for vaccinations.

The PDA early Guidance published in May 2020 and August 2020 highlighted key steps that needed to be considered for the safe provision for this year's service.

Early and widespread feedback from members is now being received and this gives much cause for concern. Whilst it is fully recognised that pharmacy has a greater role to play in this service, this must not be to the detriment of the safety of patients, nor must it have the effect of damaging the well-being of pharmacists and their teams. The PDA has considerable experience of flu vaccination services and understands what happens when things go wrong. Already it is handling claims from patients for alleged injury due to perceived vaccination errors. Some pharmacists are being asked to provide vaccination services in premises that are wholly unacceptable. Whilst on the one hand many pharmacists are already exhibiting symptoms of burnout from stress, others are creating a problematic operational climate by making irresponsible remarks on social media claiming that they have managed to deliver what in effect is a wholly inappropriate large number of vaccinations in a very short period of time.

For all of these reasons, further guidance is now necessary to protect both public health and the professional reputation of pharmacists in light of a profiteering approach exhibited by certain large employers.

This Guidance document has been designed to guide the operations and thinking of employers, pharmacists who provide the service, CCGs and Health Boards, contractor organisations and contractors, regulators, chief pharmacists of the four countries of the UK and policy makers within Government.

The PDA is issuing this guidance and putting certain business behaviours under the public spotlight (mainly those of the large corporate operators) because it is imperative that certain business behaviours are modified to protect the public.

The Guidance document is laid out in summary form and covers :

- **Key Measures that must be in place**
- **Staff wellbeing and health**
- **Target setting and coercive bullying behaviour**

The following comments and recommendations are based on the feedback the PDA has received from many pharmacists about some exceptionally poor behaviours. This is creating risks for the public and affecting the well-being of a key part of the NHS workforce (i.e. pharmacists and their teams).

Key Measures including Key Safety Measures that MUST be in place and considered

The role of the Responsible Pharmacist (RP) is clearly defined in legislation. The RP must “secure the safe and effective running of the pharmacy”.

This is **not** the role of the pharmacy owner (unless he or she is the RP), a corporate pharmacy superintendent, an area manager or a pharmacy manager.

In context of the current flu vaccination service, as the professional most local to the provision of the service, it **must** be the RP that decides on the most critical safety measure which is the number and timings of the vaccinations that can take place each day within the pharmacy.

Due to the extra-ordinary pressures being placed upon the service this year, the RP **must** create a FULL Standard Operating Procedure (SOP) for 2020 for the provision of the flu vaccination service, or if the 2020 SOP already exists or has been provided by the owner, the RP **must not** be prevented from modifying this if necessary (after informing the owner or superintendent) in order to secure the safe and effective running of the pharmacy.

This 2020 SOP **must** be in place and **must** take into account the specific risk of Covid-19 infection and transmission. All staff **must** be able to access this SOP and **must** have been trained in the modified processes for the service that apply.

Within this SOP there **must** be a provision for a full risk assessment to have been conducted for the 2020 flu vaccination service.

This **must** be specific to that individual premises and **must** consider :

- Patient safety (cleaning of consulting room, social distancing etc)
- Safety and well-being of ALL staff
- Special adjustments based on individual staff risk assessments
- Premises specific adjustments for a safe service provision

A risk assessment tool is available at no cost from the PDA <https://www.the-pda.org/pda-publish-risk-assessment-tool-2020/> :

The PDA is receiving worrying and consistent feedback that the RP is not being allowed to make the final decision on the safe provision of this service and is being over-ruled or subjected to threats of disciplinary measures, often by non-qualified managers.

Concerns are being expressed that it is being made a condition of taking a locum booking that the locum provides the flu vaccination service even in pharmacies which may not be able to satisfy basic safety requirements such as appropriate staffing levels or premises which are not fit for purpose and could not satisfy the regulators premises standards.

It is not within the remit of a pharmacy manager, an area manager or a pharmacy superintendent (whether a pharmacist or not) or the pharmacy owner to overrule the duty Responsible Pharmacist and their assessment based upon an analysis of the guidance provided by the regulator, other reliable sources and even a modicum of common sense of what constitutes a safe service including :

- The number of vaccinations that can be safely provided on any day
- The number of extra support staff (including a 2nd pharmacist if needed) to provide a safe vaccination service
- The measures that need to be in place to support the safe delivery of the service

Some large pharmacy chains have a centralised or online booking facility, however the RP has been unable to set limits or control timings of bookings. The RP **must** be able to set the daily limits and timings of when the Flu vaccination

service can take place as they have the safety of the rest of the pharmacy to also consider.

The RP **must** have access to block further bookings (or rearrange existing bookings if an unsafe number have been booked in without their consent) if they are concerned that they cannot be delivered safely, or that the result would be a serious diminution of patient safety elsewhere in the pharmacy.

Contractors **must not** direct the RP to give preference to the flu vaccination service over the safe delivery of core pharmacy services (such as the safe delivery of dispensing and supervision of medicines supply). The PDA has encountered many examples of this where corporate owners have specified that dispensing be left for a later date in preference for flu vaccinations.

Recommendations

- Employers **MUST** recognise the Statutory Role of the RP in securing the safe running of a pharmacy.
- The RP **MUST not** be pressured / overruled by owners or area managers.
- A Flu Vaccination SOP specific for 2020 in light of Covid-19 risk **MUST** be in operation.
- A FULL service, premises and staff Risk Assessment **MUST** have been completed
- There **MUST** be a specified maximum number of vaccinations per day in context of Covid-19 cleaning and social distancing requirements and overall workload.
- The Flu vaccination service **MUST not** be prioritised in a way that reduces the safety of the core dispensing and medicines supply service.

Staff Well-being and Support.

Pharmacists and their teams have worked exceptionally hard and always in difficult conditions throughout the course of the pandemic. Many have worked seven days a week in order to serve patients during a period when the only readily accessible healthcare professional within primary care was a pharmacist.

The heightened demand for flu vaccinations was well predicted but despite this, some large corporate chains have failed to put into place any measures to support the well-being of their staff.

In a practical sense, their behaviour and their lack of support at this time is having the effect of detrimentally impacting upon the well-being of pharmacists and their teams. The huge (and entirely predictable) increase in workload on these teams has meant that pharmacists are now working under extreme stress causing danger to their well-being. This workload is not sustainable over the winter and especially as we see a wider community transmission of Covid-19 and the predicted second wave of high rates of infection.

All employers have a duty of care towards their employees, but this is especially apposite for those that operate within the NHS framework.

It is well known that workload and in particular the inability to control one's own workload is a huge cause of stress for pharmacists who want to provide a safe service.

In the absence of support from employers' pharmacists have been seeking from the PDA an exceptional level of support. Many are exhibiting a deterioration of their health, others are contemplating leaving the profession after decades of unblemished service.

The PDA has received unprecedented levels of feedback from members on the impact to their well-being that this is having not only them but also on their wider families, especially when pharmacists are living with shielded or vulnerable persons.

Recommendations

- Pharmacists **MUST** be allowed to manage their workloads including capping the number of flu vaccinations they offer on any given day.
- Corporate owners **MUST** provide extra resources for the flu vaccination service to reduce work related stress and must not seek to profiteer from the heightened demand.
- Pharmacists and their teams **MUST** be offered and allowed access to well-being support resources.

A Culture of Bullying and Threatening Behaviour.

Even though this is the only the start of the autumn winter period in a year when an exceptional demand on healthcare resources is anticipated and especially on pharmacists and their teams, pharmacists are already feeling the brutal cold bullying behaviours of large corporate employers.

Of specific note within this culture of bullying is the denigration of any pharmacist that dares to suggest that having XX number flu vaccines booked in whilst having to supervise the dispensing of hundreds of prescriptions is unreasonable and would compromise patient safety.

PDA members have explained that sometimes they are required to deliver in excess of 40 flu vaccinations in a single day whilst simultaneously having to dispense hundreds of prescriptions with no extra resources or sometimes even in the absence of regular dispensary staff.

The PDA is increasingly coming across the reprehensible behaviour of some large corporate chains questioning the competency of pharmacists when they refuse to undertake these high volumes of flu vaccinations. Threats made to these diligent professionals include reporting them to the regulator (for alleged competency deficiency) , disciplinary measures or a block on future bookings if a locum.

Recommendations

- There ***MUST*** be leadership from the top of the profession to reverse this culture of bullying and intimidation that is overwhelming practitioners.
- The Regulator ***MUST*** issue regulatory guidance on workplace bullying in light of the increasing support requested by pharmacists.
- Pharmacy owners ***MUST*** fulfil their legal obligation to prevent bullying of pharmacists and their teams by their area managers or managers.