

PH/059

LOTHIAN AREA PHARMACEUTICAL COMMITTEE

NHS Lothian, Deaconess House, 148 Pleasance Edinburgh EH8 9RS

Chairman : Mrs Pat Murray

From:
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Susie Braham
Scottish Executive Health Department
St Andrew's House
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Regent Road
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30th May 2004

Dear Ms Braham

Re:- Response of Lothian Area Pharmaceutical Committee to the consultation document, "Modernising NHS Community Pharmacy in Scotland."

I am writing, in relation to the above, on behalf of the Lothian Area Pharmaceutical Committee (LAPC), the statutory advisory committee on pharmaceutical matters to NHS Lothian.

The LAPC welcomes the consultation document and recognises that the New Pharmacy Contract heralds a new exciting and challenging phase for community pharmacists throughout Scotland.

Section 1

- Whilst section 1 provides a succinct and useful summary of the current funding mechanisms, it should not be forgotten that the community pharmacy network is provided by the community pharmacists, who as independent contractors to the NHS have a substantial personal, and corporate, investment in the community pharmacy infrastructure. In Lothian with 172 pharmacies with NHS contracts it is estimated that this investment of private finance is in the order of £86 million pounds.
- The recognition for the true funding mechanism of community pharmacy needs to be recognised and will require legislation

Section 2 – Introduction of the New Pharmacy Contract

- LAPC agree that the new contract funding should recognise core pharmaceutical services but should not ignore the important dispensing role.
- The legislation to allow this should identify who would be responsible for writing clinical protocols.
- In relation to Standard Operating Procedures and quality assurance activities, clarity is required as to whether standards would be national or local.
- The legislation needs to address the fact that pharmacists and support staff need access to clinical patient data with the cross transfer of information via the NHS net.
- Patient registration with a community pharmacy would be desirable.
- Innovative and forward thinking pharmacists should not be limited by core services and should be able to secure local funding for other services such as Flu immunisation clinics.

Section 3 – Planning & Provision of Pharmaceutical Care Services

- LAPC support the view that pharmaceutical services should be implemented in a planned way and reflect the needs of all populations, and allow a rational distribution of community pharmacies.
- The legislative framework needs to make provision for Pharmacists “stuck “in contracts to relocate or surrender their contract without financial loss.

There should be a national funding agreement for contractors.

- LAPC recommend consideration be given to an another possible model of a pharmacy consortium in areas of over-provision where the number of pharmacists providing services remains the same but the number of premises is reduced.
- As NHS Boards take over the responsibility to allocate contracts there must be strict criteria in place to allow a fair and transparent decision process.
- An appeals procedure must be in place.

Section 4 – Pharmaceutical lists

- LAPC agree that a pharmaceutical list is desirable
- In theory all pharmacists in the Health Board area should be on the list to allow cross transfer of skills.
- There would need to criteria set down for a pharmacist to apply to a list e.g. CPD
- The registration process must be rapid to allow for emergency situations.

Section 5 – Persons Authorised to Provide Pharmaceutical Services

- The action proposed will allow pharmacists to devote more time to patient care but it must be recognised that there is a manpower shortage not only of the pharmacists but also of pharmacy technicians.
- The pharmacy must have Standard Operating Procedures in place and also recognise the importance of other support staff.
- Inevitably it must be recognised that these additional skills will have an impact on the salary costs of a community pharmacy.

Section 6 – Cross Boundary and distant provision of Pharmaceutical Services.

- LAPC agree that it is desirable to allow innovative ways of providing pharmaceutical services, but these must be to the patients benefit and not a cheap alternative to pharmaceutical dispensing and patient care.
- Risk assessment must be taken into consideration and an audit trail for delivery if necessary.
- Patients already have a convenient option – a community pharmacy in their locality.

Section 7 – Funding of Pharmaceutical Services

- LAPC welcome the flexibility for funding and would welcome a holistic approach but do not wish to see the budgets swallowed by bureaucracy before reaching the individual community pharmacies.
- We welcome the ability of the board to pay additional sums for more enhanced services which will encourage and reward innovative pharmacists. This remuneration should be consistent across health boards. It is important, however, that any such additional funds for development of pharmacy services are ring fenced.

SECTION 8 - Partial Regulatory Impact Assessment

- LAPC consider that Option 3 is the only realistic option. Amendment of the current primary and secondary legislation to allow full implementation of the policy proposals is essential, and the only way forward.
- It is considered that it is un-realistic to continue to try and make progress by “stretching” existing Regulations. There is no doubt that the full potential of Community Pharmacists contributing to the improved healthcare of the population of Scotland will only be achieved with a new contract.

CONCLUDING COMMENTS

LAPC very much welcome the publication of "Modernisation of NHS Community Pharmacy in Scotland."

"The Right Medicine" has provided a good and robust framework for the development of pharmaceutical care in Scotland – a new contract will enable many of its recommendations to be brought into effect.

Yours sincerely

A handwritten signature in black ink, appearing to read "Peter Jones". The signature is written in a cursive style with a large initial 'P'.

Peter Jones
Professional Secretary
Lothian Area Pharmaceutical Committee