

PW/072

Linda E Haase MA CA
Chair NAP
C/o SHSC
Crewe Road South
Edinburgh
EH4 2 LF

Susie Braham
Scottish Executive
Health Dept
St Andrews House
IER
Regent Road
Edinburgh EH1 3DG

1 June 2004

Dear Ms Braham

**Modernising NHS Community Pharmacy in Scotland
Response to Consultation Paper**

I refer to the above and enclose my response as chair of the National Appeal Panel for entry to the Pharmaceutical Lists.

Based on the experience of the National Appeal Panel having a shared understanding of any new plan is vital for a fair and effective system.

**Section 3
Planning and Provision of Pharmaceutical Care Services**

The proposal to improve the planning and provision of services via a more pro-active role of the NHS boards is to be welcomed. However there is concern at the lack of detail as to how this will be determined. Any new system must be well thought through, be transparent and easy to understand by all parties involved. Points that need to be clarified in full detail include:

3.1 what will be meant by '**convenient**' access?

3.7 what **criteria** will be used for the 'more objective assessment for determining where PCS are to be located or delivered'? **Who** will determine the arrangements that result in an agreed PCS plan?

3.9 what will be the '**set period**' of time that holding PCSP contracts will be granted? Is there a danger that good relations which local patients currently enjoy with pharmacists with existing contracts could be threatened?

3.14 Will the requirement to **submit applications** favour applicants with greater resources? Where there are multiple applications for a new provision what **criteria** will be used to determine the successful applicant? What **process of appeal** will there be for unsuccessful applicants?

The experience of the National Appeal Panel has highlighted how vital it is to have a system that is responsive to changing needs and is in tune with current reality.

3.16 **what time-scale** will be built in to the periodic reviews both of PCSP contracts and PCS plans? Will it be sufficient to ensure flexibility in the system allowing a framework responsive to changing needs?

Section 6

Cross Boundary and Distant Provision of Pharmaceutical Services

Based on the experience of the National Appeal Panel it is a step forward to introduce contracts appropriate to the service provided by, for example, appliance suppliers. The location of the business is not relevant in this situation and was therefore an anomaly in the existing system.

Section 8

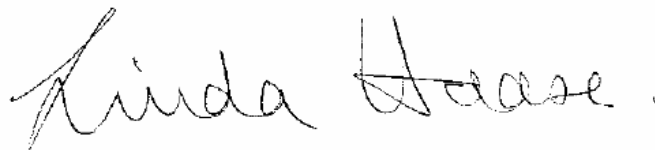
Partial Regulatory Impact Assessment

This is an opportunity to rationalise all legislation which impinges on pharmacy service provision. It must reflect the way things are and guarantee a seamless transition.

Given that there will still be a 'control of entry' mechanism it is hard to envisage that the new system will be able to operate without an appeal process. The process of appeal must continue to be fair and follow good practice.

I hope the above comments are useful.

Yours sincerely

A handwritten signature in black ink that reads "Linda Haase". The signature is written in a cursive, flowing style with a large initial 'L'.

Linda e Haase

Chair

National Appeal Panel for entry to the Pharmaceutical List