

April 26th 2006

The Company Chemists' Association,
Scottish Management Group (CCASMG),
Regional Office,
79-91 High Street,
Falkirk.
FK1 1ES

Ms. Charmain Runciman,
Scottish Executive Health Department,
St. Andrews House,
1ER,
Regent Road,
Edinburgh.
EH1 3DG

Dear Ms. Runciman,

RE; Consultation on the Review of NHS Prescription Charges and Exemption Arrangements in Scotland.

The Company Chemists' Association Ltd (CCA) provides a forum for the large businesses engaged in retail pharmacy to work together to help create an environment where community pharmacy can flourish, and where pharmacy contractors compete in a fair and equitable way. The CCA has nine companies in membership who between them own over 4,500 pharmacies in the UK and just below 50% of the pharmacies in Scotland. They are: Boots The Chemists, Alliance Pharmacy, Lloyds Pharmacy, Tesco, J Sainsbury, Wm Morrison Supermarkets, Asda, Rowland's Pharmacy and Superdrug. The Company Chemists' Association Scottish Management Group (CCASMG) represents the interests of these companies in Scotland.

CCASMG welcomes the opportunity to respond to this consultation on the Review of Prescription Charges and Exemption Arrangements in Scotland.

The discussion document clearly sets out a range of proposals on how exemptions and prescription charges are leveled or applied across many differing ranges of healthcare settings. We at CCASMG believe this part of the consultation is an area of socioeconomic and political determination in its purest form and is therefore not an area of consultation that we as a group can specifically respond to.

We do however believe that if prescription charges and therefore exemptions are to be retained by the Executive certain principles should be born in mind when deciding the form and codification of such charges and exemptions.

CCASMG firmly believe the following points have to be considered when applying prescription charges and exemptions;

- While the over riding consideration is one of fairness this has always to be balanced against simplicity in there application. Over complication in the drive to achieve fairness results in confusion and increased bureaucracy, limiting the effectiveness of such charges or exemptions.
- Cost effectiveness in application has to be considered. While it may be acceptable to expect the public to contribute to their overall usage of the NHS prescription service, the system for applying and monitoring such a scheme and the exemptions to it, has to be both robust and simple in concept, in an attempt to minimise the associated costs including manpower in applying and policing its application.
- Given the increasing time pressure on healthcare professionals, including pharmacists, due consideration should be given to minimise any over due burden on the professionals and staff who have to apply it.

We trust our comments will be noted and are an acceptable contribution to this consultation and thank you for an opportunity to comment.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Charles Tait', with a long horizontal flourish extending to the right.

Charles Tait.
Secretary CCASMG

RESPONDEE INFORMATION FORM

Please complete the details below and attach it with your response. This will help ensure we handle your response appropriately:

Name: *Company CHEMISTS ASSOCIATION SCOTLAND MANAGEMENT GROUP (CCASMG)*

Postal Address: *Regional office 79-91 High Street, Falkirk FK1 1ES*

Consultation title: *REVIEW OF NHS PRESCRIPTION CHARGES AND Exemption Arrangements in SCOTLAND*

1. Are you responding as: (please tick one box)

- (a) an individual (go to 2a/b)
(b) **on behalf of** a group or organisation (go to 2c)

2a. INDIVIDUALS:

Do you agree to your response being made available to the public (in SE library and/or on SE website)?

- Yes (go to 2b below)
No, not at all

2b. **Where confidentiality is not requested**, we will make your response available to the public on the following basis (**please tick one** of the following boxes)

- Yes, make my response, name and address all available
Yes, make my response available, but not my name or address
Yes, make my response and name available, but not my address

2c ON BEHALF OF GROUPS OR ORGANISATIONS:

Your name and address as respondents **will be** made available to the public (in the SE library and/or on SE website). Are you content for your response to be made available also?

- Yes
No

3. We will share your response internally with other SE policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future for consultation or research purposes?

- Yes
No