Stakeholder Comments

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<table>
<thead>
<tr>
<th>Name:</th>
<th>Helen Chang (Senior Professional Support Pharmacist, RPS Support Manager)</th>
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<tbody>
<tr>
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<td>Royal Pharmaceutical Society</td>
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<td>General</td>
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<td>The Royal Pharmaceutical Society welcomes the update to the NICE public health guidance on needle and exchanges programmes (NSPs), and agrees with the overall scope and recommendations made.</td>
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We are pleased that the role of pharmacy, in particular community pharmacists has been highlighted as key providers of NSPs in this guidance. Community pharmacists play a vital role in the provision of services to substance misusers as part of harm reduction programmes, including the supervision of medicines used to manage opiate addiction (such as methadone and buprenorphine), supply of injecting equipment and advising on safe injection.

As pharmacists come into regular contact (usually daily) with substance misuse patients, they are able to build relationships and support them with other healthcare needs. They are also more likely to identify any issues with treatment and thus make appropriate referrals to substance misuse teams and other NSP providers.

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| Some community pharmacies are also involved in harm reduction strategies to minimise the risks associated with hepatitis B and C, through the provision of screening and vaccination services.  
| Many pharmacists also have a commissioning role in their local area and will be responsible for delivery of local services.  

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| Community pharmacists also have a significant role in public health helping to raise awareness, tackle issues, and minimise harm associated with substance misuse and abuse, and the injection of drugs.  
| The RPS are currently drafting professional standards for public health to help lead, support and develop pharmacists and pharmacy teams across Great Britain, to enable delivery of high quality public health services.  

Please add extra rows as needed

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| Recommendation 4 | 9 | We agree that NSP providers should collect relevant information on the usage of services to increase understanding of who accesses these services and give a picture of the scale of injecting drug use. It will also help inform the development of services to make sure they meet local needs and improve the health and wellbeing of the wider community.

Pharmacies that are part of commissioned NSPs already collate data on service usage to support research. IT initiatives have been developed in Wales and Scotland to allow community pharmacies to capture information electronically. This information can be linked up with patient medical records to enable pharmacists to provide better care.

The RPS draft professional standards for public health also include standards for ‘Surveillance and assessment of the population’s health and wellbeing’ and ‘Public health intelligence’.

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| Recommendation 5 | 10 | Pharmacists are required to follow standards and guidance around consent and have the necessary training to appropriately assess young people’s competence to consent, therefore the we recommend that the statement about pharmacy provision is made stronger and “may” is deleted. |

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National Institute for Health and Care Excellence

PUBLIC HEALTH GUIDANCE – Needle and syringe programmes (update)

Consultation on the Draft Guidance from 24 September - 5 November 2013
Comments to be received no later than 5pm on Tuesday 5th November 2013

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<td>Recommendation 6</td>
<td>11</td>
<td>Pharmacies are well places to provide level 1-3 services; many already offer such services. We agree that services should be coordinated to ensure patients can access care when needed. We would encourage more focus on referral to pharmacies with longer opening hours to ensure that injecting services are available when needed, as opposed to increasing the capacity of the use of vending machines. Use of pharmacies ensures that people using NSPs are able to access a professional who can provide additional health advice as necessary. In larger cities in the UK, some community pharmacies are open 24 hours, with many opening late into the evening, weekends and bank holidays, making them very accessible to those who may not have contact to other health professionals or NSPs.</td>
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| Recommendation 8 | 13 | We would suggest that information about the role of pharmacists in health promotion is added to this section.  
For example pharmacists can provide public health advice on wound management, reducing alcohol consumption, and sexual health. |

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