



Rt Hon Matt Hancock MP  
Secretary of State for Health and Social Care

*By email*

11 September 2020

Dear Minister,

### **Legislation change to support patient access to medicines**

We are concerned about the impact that medicines shortages are having on patient care and urge you to work with GPs, pharmacists and patient groups to reduce bureaucracy and speed up access to appropriate treatment.

Pharmacists and GPs are having to spend more time dealing with medicines shortages, with community pharmacists legally obliged to contact prescribers or refer people back to prescribers to amend original prescriptions, even for minor adjustments.

This is frustrating for the patient, pharmacist and prescriber. The process can cause delays in access to medicines and takes up health professionals' time, which could be used elsewhere to support patient care.

Consistent feedback from health professionals suggests that, while they may be appropriate for certain nationwide shortages, Serious Shortage Protocols are rarely used. GPs, pharmacists and patient groups believe a more pragmatic approach is required.

Legislation should be amended to allow pharmacists to make minor amendments to a prescription, without a protocol, when a medicine is out of stock. Amendments would include changes such as a different quantity, strength, formulation or generic version of the same medicine (generic substitution).

Such substitutions are routine for pharmacists in secondary care. They are used in Scotland for medicines on a recognised shortages list. In Wales, the All Wales Pharmacist Enabling and Therapeutic Switch Policy enables pharmacists to make certain changes without contacting the prescriber.

These proposals would not extend to therapeutic substitution, which should instead be referred back to the prescriber, potentially notifying them of available alternatives to help them make appropriate changes to medicines.

We recognise there are particular considerations for certain medicines, such as for epilepsy or transplants, and this change in policy should be supported with guidance on when substitutions may or may not be suitable. All of this should be underpinned by person-centred care, clear communication, and decisions taken in discussion with patients. This proposal was broadly welcomed on a webinar hosted by National Voices in July. We would expect the patient voice to continue to help shape future policy development.

The Government has warned of potential disruption to medicines supplies at the end of the UK's transition period for exiting the European Union. COVID-19 has shown the importance of supporting and enabling professional judgment to put patients first and this proposal should be part of prudent changes to enhance patient care. We would welcome your support and stand ready to work with your officials on how this could be implemented.

Yours sincerely,



Dr Richard Vautrey  
Chair, General Practitioners Committee  
British Medical Association



Sandra Gidley  
President  
Royal Pharmaceutical Society



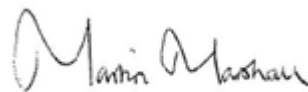
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