

**Consultation on the Drug Death Prevention (Scotland) Bill** **August 2022**

**RPS Submitted response**

1. Which of the following best expresses your view of the proposed Bill? (please note this is a compulsory question) \*
* Fully supportive
* Partially supportive
* Neutral (neither support nor oppose)
* Partially opposed
* Fully opposed
* Do not wish to express a view

Please explain the reasons for your response.

We are partially supportive of the Bill overall as we are fully supportive of the majority of elements within it and have taken a neutral stance on one which is detailed in our answers. As we consider new ways of engaging with patients in a bid to reduce drug deaths, it would be remiss of us not to consider ways of working and engagement which have proved very successful in other countries. There are now around 100 supervised drug consumption facilities across the world, primarily in Europe, which have provided over thirty years of evidence of their effectiveness.

The RPS, as the leader in safe and effective use of medicines, supports the establishment of regulated drug consumption facilities, and the necessary changes in legislation to enable this, as part of a focus on reducing drug deaths. Pharmacist and pharmacy teams are ideally placed to advise on the appropriate governance structures required to operate a regulated facility of this nature.

Providing a clean, safe place for injecting users brings them closer to mainstream health and addiction support services and provides the opportunity for health professionals to engage in treatment and prevention.

### Do you think legislation is required, or are there are other ways in which the Bill’s aims could be achieved more effectively? Please explain the reasons for your response.

### To ensure the safe and effective operation of these facilities, legislation would be required to allow them to be licensed and regulated. This would allow a minimum set of standards and detailed requirements to be essential before a license would be granted. Licensing and regulation are important to ensure consistency and that the facilities are operating safely for both staff and the patients using them and that they have the appropriate resources to be able to offer a service that will truly make a difference.

1. Which of the following best expresses your view of the proposal to establish overdose prevention centres?
* Fully supportive
* Partially supportive
* Neutral (neither support nor oppose)
* Partially opposed
* Fully opposed
* Do not wish to express a view

Please explain the reasons for your response.

As we consider new ways of engaging with patients in a bid to reduce drug deaths it would be remiss of us not to consider ways of working and engagement which have proved very successful in other countries. There are now over 130 overdose prevention centres across the world, primarily in Europe, which have provided over thirty years of evidence of their effectiveness.

The RPS, as the leader in safe and effective use of medicines, supports the establishment of regulated overdose preventions centres, and the necessary changes in legislation to enable this, as part of a focus on reducing drug deaths. Pharmacists and pharmacy teams are ideally placed to advise on the appropriate governance structures required to operate a regulated facility of this nature.

Providing a clean safe place for injecting users brings them closer to mainstream health and addiction support services. It provides the opportunity for health professionals to engage in treatment and prevention.

Overdose preventions centres also provide an opportunity for outreach work to be carried out by teams, including pharmacy teams, and for health and medication checks to be undertaken in a population who may not be engaged with services. However, it is vital that there are robust referral pathways into treatment for patients who express a wish to make that move.

It is important to consult the local community about any plans for a facility, this will improve understanding of the benefits and encourage support.

1. Which of the following best expresses your view of the proposal for a licensing regime to enable the establishment of overdose prevention centres?
* Fully supportive
* Partially supportive
* Neutral (neither support nor oppose)
* Partially opposed
* Fully opposed
* Do not wish to express a view

Please provide reasons for your response, including on the proposed conditions for licensing (see pages 12 to 14 of the consultation document) and on the proposal that health and social care partnerships are responsible for licensing and scrutinising OPCs?

RPS believes that any overdose prevention centres must be licensed to ensure consistency of service, safety, and effectiveness. It is also essential that the centres are opened where there is a local need and this is best assessed by those providing local services in conjunction with other local stakeholders e.g., those supporting local IEP providers to ensure local knowledge and issues are considered.

We support the conditions proposed for licensing but may need review and expansion to ensure they are stringent. There needs to be consideration given to any security measures that should be put in place to ensure the safety of staff and patients. We also think it is essential that not only are there medical staff there at all times but also there should be minimum levels of overall staffing, and all should be appropriately trained.

1. Which of the following best expresses your view of the proposal for a new body, the Scottish Drugs Deaths Council?
* Fully supportive
* Partially supportive
* Neutral (neither support nor oppose)
* Partially opposed
* Fully opposed
* Do not wish to express a view

Please provide reasons for your response, including views on the proposed functions of the SDDC (see pages 14 to 16 of the consultation document) and on how it should operate in practice.

We welcome any move that it was felt would result in a reduction in drug deaths but would like to acknowledge the good work the Drugs Death Task Force, of which we are members, has achieved already.

1. Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?
* a significant increase in costs
* some increase in costs
* no overall change in costs
* some reduction in costs
* a significant reduction in costs
* skip to next question

Please explain the reasons for your answer, including who you would expect to feel the financial impact of the proposal, and if there are any ways you think the proposal could be delivered more cost-effectively.

There will be cost to considering licences, setting up new centres, and the ongoing monitoring and regulation of the sites. However, some of this will be offset by the savings made in other service areas such as hospital inpatient stays and treatment at accident and emergency. The patients using these centres will be able to access professional healthcare for not only their addiction and drug use but potentially for other health or medication problems and interventions can be made which will avoid emergencies further down the line.

### Any new law can have an impact on different individuals in society, for example as a result of their age, disability, gender re-assignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.What impact could this proposal have on particular people if it became law? If you do not have a view skip to next question.

### Please explain the reasons for your answer and if there are any ways you think the proposal could avoid negative impacts on particular people.

### This proposal would allow some of the most marginalised individuals in society a means to access professional healthcare they wouldn’t otherwise have. It would provide them a safe space where they could have access to clean injecting equipment and harm reduction advice from non-judgmental supportive staff.

### Some members of society may feel they will be adversely affected by the fact they live in close proximity to a facility; however, this could be mitigated with community engagement and education about the benefits to patients and the community of reduced public injecting and reduced waste.

### Any new law can impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations.Do you think the proposal could impact in any of these areas? If you do not have a view then skip to next question.

### Yes

### Please explain the reasons for your answer, including what you think the impact of the proposal could be, and if there are any ways you think the proposal could avoid negative impacts?

Discarded needles and injecting equipment pose a threat to the public and destroy local environments. Overdose prevention centres can reduce this waste by reducing the public injecting and providing patients who use them with appropriate disposal facilities.

Overdose prevention facilities also offer patients a link into treatment they wouldn’t otherwise have which they can take up if and when they decide to. In the meantime, they will be supported and helped to better manage their addiction, drug use and health.