

**Comments**  
**Modernising NHS Community Pharmacy in Scotland**  
**(Consultation Paper 2004)**

Proposal 2.9

How would patient registration with community pharmacies be achieved? What about geographical areas where there is no community pharmacy? Does the Scottish Executive need to consider whether additional powers are required in order to establish the provision of pharmaceutical services to remote and rural areas where these services do not currently exist? How will patients/consumers be involved in the development of pharmaceutical care services – should the involvement of patients/consumers be regarded as essential to the development of pharmaceutical services and if so, what action needs to be taken to ensure that this happens.

With regard to clinical protocols and standard operating procedures, which organisation should have responsibility for the development, dissemination and implementation of these tools? Currently, there is no single organisation or agency with responsibility for these materials therefore this would need to be addressed.

2.10

Currently, the NES provides opportunities for continuing professional development of some but not all NHS staff. Within community pharmacy there is no organisation with overall responsibility for the provision of training to medicine counter assistants and other members of pharmacy support staff. These individuals are crucial to the provision of pharmaceutical care within the community yet their training needs are not accommodated at present. There is urgent need to address this deficiency.

Reporting of adverse incident reporting or near misses. I am unaware of any national reporting mechanism within Scotland to record these types of data and furthermore to disseminate these data to other health care professionals, policy makers and the public. The reporting and recording of these data are imperative if the NHS in Scotland is to develop in terms of patient safety and risk management. In England, the National Patient Safety Agency has responsibility for these activities, yet there is currently no equivalent organisation in Scotland. Is there scope for collaborating with the NPSA to address this deficiency in Scotland? It is important that any system what is introduced should focus on the process of care and not solely the individuals with whom the incident has arisen.

Section 3

Remote supervision is an alternative model for providing pharmaceutical care particularly in remote and rural areas. This model needs to be developed and evaluated to determine whether it is effective, efficient and acceptable. To date, there has been little evaluation of this model in the UK in general and Scotland in particular.

#### Section 4

A list of services that the contractor is permitted to provide should be established so that consumers know which pharmacy to attend for the care that they require.

#### Section 5

The proposed action will only enable community pharmacists to devote more time to direct patient care if other pharmacy staff are sufficiently trained/experienced to adopt the supply role, and if provision of direct patient care services are adequately remunerated. It is possible that some pharmacists may not increase these services, but would spend more time away from the pharmacy. Legislation and contracts would need to be devised to address these potential difficulties.

#### Section 6

Yes, it is desirable to have powers to encourage innovative ways of providing pharmaceutical services in the future. It is important to ensure that the quality of service and accountability for its provision is clearly defined. It is also important to provide innovative services that have been assessed in terms of effectiveness and efficiency BEFORE they are introduced nationally.

There is a potential conflict between patient choice and efficiency: a patient may prefer a service provided by an external contractor but which costs the health board more .... I think this needs to be developed further in order to obtain a clearer perspective of what possibilities exist and the risks associated with these.