

CONSULTATION RESPONSE

Control of Entry Regulations and Retail
Pharmacy (OFT Report):

a response by Age Concern Scotland to

Ronnie Fraser, Scottish Executive Primary Care
Division

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Andrew Sim
0131 625 9326
Andrew.sim@acscot.org.uk

Control of Entry Regulations and Retail Pharmacy

Age Concern Scotland has strong reservations at the proposals contained within the report. Our main concerns are around the potential lack of access to community pharmacy services and of the threat to the medical principles underlying the current system. We urge the Scottish Executive Health Department to reject the proposals.

We are concerned that the OFT proposals will disadvantage older people by threatening the stability of the current system, particularly in terms of access. Older people rely heavily on the close proximity to a community pharmacist and the danger of situating pharmacies away from where they live will inevitably be detrimental to them. Access to a car is lower among older people and many rely on public transport. Half of the 65+ age group live in households with no car (compared with 23% of all other adults), whilst 13% of the 65+ age group said they did not use transport due to illness or disability. ('Older people in Scotland': results from the first year of the Scottish Household Survey. *S.E Central Research Unit 2001*).

We acknowledge that there is more to access than location, but feel concerned about other access issues. Home delivery and domiciliary visits will be threatened, as they are voluntary schemes, and it is likely that the commercial interest of supermarkets would override the patient's interest. Older people rely on these services and we are concerned that services, such as the domiciliary oxygen service could also be lost to some older patients.

We are also concerned that the medical principle underlying the current role of the community pharmacist will be undermined by accepting the OFT focus on the 'consumer' and not on the 'patient'. Other voluntary schemes, such as those providing compliance aids, or monitored dosage systems, are highly valued by older people. We are concerned that supermarkets would choose not to participate, to the detriment of disadvantaged groups. Where commercial interests are foremost, the dispensing treatment for stigmatising conditions that might require supervised drug administration (tuberculosis or substance misuse treatment for example) could well be lost.

Age Concern Scotland supports the current system of NHS contract control and the strategy for pharmaceutical care laid out in 'The Right Medicine'. This promotes closer liaison between health services, allowing a more integrated service and one of good quality. We are concerned that the OFT report focuses on the effect of deregulation on 'over the counter' trade rather than on quality of service and on the role of Pharmacists in areas such as health education.

Age Concern Scotland would urge the Scottish Executive Health Department to reject the proposals contained within the OFT report.