

Fraser R (Ronnie)

From: Stuart Hay [Stuart.Hay@helptheaged.org.uk]
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To: pharmacy.report@scotland.gsi.gov.uk
Subject: Consultation Response

Importance: High



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FAO: Ronnie Fraser
Primary Care Division

Please find attached the response of Help the Aged to proposals for the removal of "Entry Controls" by the OFT

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Ronnie Fraser
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26/2/03

Dear Mr Fraser

Regulation of Community Pharmacy

I write in response to the Scottish Executive's Consultation on Community Pharmacies and the proposal by the OFT to abolish entry regulations.

Help the Aged believes that the above proposals are not in the interests of Scotland's most vulnerable older people. Firstly, it is worth highlighting that people over 60 are the biggest users of pharmacies and would be the group most effected by any change. Secondly, older people are less likely to posses a car and will therefore have increased reliance on locally based pharmacy provision. This situation means that any proposal that alters the existing distribution and overall number of pharmacies could decrease accessibility and convenience for a key user group.

Pharmacies are not just small businesses but an integral part of the health care system with 80% of their turnover focusing NHS activity. This role is recognised by the Scottish Executive in its pharmacy strategy. It seems foolhardy to embark on a course of action, which will see community-based facilities being concentrated in profitable areas, or replaced by large retailers based on sites that are primarily aimed at car owners. Help the Aged therefore strongly opposes a course of action that threatens the coherence and stability of the current community based network.

Whilst, consolidation and competition might reduce the financial costs of some over the counter medicines, this fails to take into account the penalty that older people will pay both in terms of reduced accessibility and greater travel dependence. The proposals also fail to recognise the added value provided to older people by small trusted community based facilities. This focus on local customers would be replaced by a narrower commercial ethos employed by large retailers. In such cases the pharmacy will simply be used to increase footfall, instead of focusing on wider community needs and health policies.

Finally, such proposals also seem ill timed given that the Scottish Executive has only recently just completed a pharmacy strategy. This strategy promises to widen the role and importance of pharmacists in primary care. The OFT's proposals do not compliment this approach and because of the uncertainties that will be generated threaten the strategies development.

Help the Aged trusts the Scottish Executive will speak up for older people in Scotland and voice its strong opposition to the proposals being put forward by the OFT.

Yours Sincerely

Stuart Hay
Policy & Parliamentary Officer
Help the Aged