

PHB 34

Bil Iechyd y Cyhoedd (Cymru)

Public Health (Wales) Bill

Ymateb gan: Cymdeithas Fferyllol Frenhinol

Response from: Royal Pharmaceutical Society

Health, Social Care and Sport Committee

National Assembly for Wales

Pierhead Street

Cardiff

CF99 1NA

16<sup>th</sup> December 2016

Dear Sir / Madam

Public Health (Wales) Bill consultation

The Royal Pharmaceutical Society (RPS) welcomes the opportunity to respond to the National Assembly for Wales' Health and Social Care and Sports Committee's inquiry on the general principles of the Public Health (Wales) Bill.

## **Part 2 – Tobacco and Nicotine Products**

We strongly support the principle of minimising harm from tobacco and nicotine products, including extending restrictions on smoking to additional premises and vehicles.

We agree that it should be an offence to sell or supply nicotine inhaling products to a person under the age of 18, unless supplied legitimately through a registered healthcare professional, in line with specific service requirements for smoking cessation. In the same respect we are supportive of the intent to make the proxy purchase of nicotine products for children

under the age of 18 an offence. We believe that clear guidance will be necessary to support this act and bring it in line with equivalent current offences regarding alcohol and tobacco.

The RPS recognises that licenced nicotine inhaling products have a benefit to adults and young people under the age of 18 who are seeking medical advice on giving up smoking, and could benefit from being supplied with these items under the guidance of an appropriate healthcare professional, including a pharmacist. Community pharmacy services are well placed to support young people in this respect.

We welcome the proposal to establish a national register of retailers of tobacco and nicotine products and believe that a strengthened restricted premises order, with a national register, will aid in enforcing tobacco and nicotine offences as well as helping to protect vulnerable or impressionable young people from accessing and starting smoking. We would recommend that all registered pharmacies supplying nicotine products be automatically included in the register.

We continue to advocate for stronger regulation of e-cigarettes. In order not to undermine recent advances in public health policy regarding the use of tobacco products, the RPS advocates that e-cigarettes should be treated in exactly the same way as any other form of smoking, including the same age restrictions as applied to tobacco products and restrictions on their use in public spaces, advertising and displays.

The RPS believes that while e-cigarettes could have a potential role in harm reduction and in supporting smoking cessation in the short term, more high-quality peer-reviewed studies on safety and efficacy should be completed in order provide policy makers and health professionals with evidence-based assurance, particularly if they are to be included in the publicly funded smoking cessation programmes, once licensed by the MHRA

### **Part 3 – Special Procedures**

The RPS is supportive of the creation of a compulsory, national licencing system for practitioners of specified special procedures, we believe that this

system will help to give people in Wales assurance of standards of care and minimise any potential health risks. We are supportive of the suggestion that the premises in which the practitioner operates as well as the practitioner themselves should be approved in order to give assurance of cleanliness and appropriateness of the premises.

We believe that the procedures covered by this bill are appropriate as they all involve 'invasive' treatments where the skin is penetrated, this could in turn expose the patient to risk of infection if the procedures were not carried out appropriately. We also condone the provision which gives Welsh Ministers the power to amend the list of special procedures, but would advocate that this is done through a consultation process to allow input from interested parties.

#### **Part 4 – Intimate Piercing**

The RPS is supportive of the need for age restrictions on intimate body piercing. We believe that it would be irresponsible to allow anyone under the age of 16 to undergo a procedure for an intimate piercing. All procedures for intimate piercing and special procedures should be regulated and auditable.

#### **Part 6 – Pharmaceutical Services**

We are pleased the Bill recognises the important contribution that pharmacists play in improving the health and well-being of the public. We strongly believe that there must be increased opportunities for patients to gain further benefit and choice in access to local health services by further developing and expanding the role of pharmacists in primary and community care. The addition of more enhanced and advanced services that utilise the clinical medicines expertise of pharmacists is important going forward.

We strongly agree with the views of the NHS confederation, that community pharmacies should play an even greater role in promoting and protecting the

health of individuals in their local communities as part of a network of local health care services.

Pharmaceutical services do not only include the accurate and safe dispensing of medicines but should refer to a broad range of clinical and patient facing pharmacist roles that deliver high quality care to support the management and prevention of health conditions. A wider definition of pharmaceutical services should encompass the essential and advanced services of the pharmacy contract and potential developments for further public health services. It is important that the term 'pharmaceutical services' is recognised by Local Health Boards in these wider terms when local services are planned.

The RPS is supportive of the proposal for assessment of a population's pharmaceutical needs and the development of appropriate services to meet those needs. The planning of local services must ensure the future sustainability of our crucial community pharmacy network in Wales to guarantee the local population access to health advice and critical pharmaceutical services. It is vital therefore that pharmaceutical need's assessments (PNAs) and the development of services are supported by long term financial planning and investment in the community pharmacy network.

We support the general principle to require Health Boards to prepare and publish an assessment of the need for pharmaceutical services. This could help to further integrate pharmaceutical care and pharmaceutical services into Health Board overall planning processes for the development of local health services. The expertise of pharmacists is key to ensuring the quality of local pharmaceutical services.

The PNA must take into consideration that for many people living in rural areas the provision of pharmaceutical care is paramount, there may already be a lack of other health and care service provision and residents may live a considerable distance from their closest hospital and accident and emergency service. The assessment should lead to better planning and delivery of pharmacy services to address identified local health inequalities and needs.

As well as providing patient care, a number of community pharmacies in Wales offer training opportunities for pharmacy students and are training providers for pre-registration pharmacists. It is vital that pharmacies are supported to offer quality training that will help to strengthen future workforce planning in Wales.

We strongly believe the PNA should take a patient centred approach to access of medicines and pharmaceutical care provided and also link in with the wider health needs of a community such as social care and care at home. The PNA process should link to local authority planning decisions to ensure the broader health service challenges presented by changes to the built environment for instance can be included in local service developments.

Overall, the RPS believes that the appropriate use of the PNA should result in better managed and planned pharmaceutical services for patients and the public. A consistent approach must be developed for all Health Boards in Wales, utilising a national template for PNA. This will ensure the reduction in health inequalities as well as allowing for robust planning of services that will address locally identified needs.

## **Part 7 – Provision of toilets**

The RPS is supportive of the proposal that each local authority in Wales will have a duty to create a strategy for improved provision of public toilets. Many patients have medical conditions that will increase the likelihood of them requiring timely access to public toilets. Medicines can also increase the need for accessing toilets. For example anecdotal evidence for patients who take diuretic tablets has highlighted that many feel housebound in the morning as access to public toilet is limited and if they are required to attend appointments or visit a town centre in the morning they will not take their “water tablet” that night. We therefore believe this is a patient safety issue that could be easily rectified through better access to public toilets.

The RPS would encourage the development of Welsh guidance to support this strategy in order to ensure a consistent approach across local authorities as well as engaging with the local population in each LHB. The provision of disabled toilets and baby changing facilities should be explicit in each LHB's strategy.

I trust this information is helpful. Please do not hesitate to get in touch if you require any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Elen Jones', written in a cursive style.

**Elen Jones**

Practice and Policy Lead, RPS Wales

The Royal Pharmaceutical Society (RPS) is the professional body for pharmacists in Great Britain. We represent all sectors of pharmacy in Great Britain and we lead and support the development of the pharmacy profession including the advancement of science, practice, education and knowledge in pharmacy. In addition, we promote the profession's policies and views to a range of external stakeholders in a number of different forums.