



Public Consultation: Access to adrenaline, glyceryl trinitrate, salbutamol, glucagon and naloxone to save life and reduce severe distress in emergency situations.

Submission from the Pharmaceutical Society of Ireland (PSI) - The Pharmacy Regulator

Introduction

The Pharmaceutical Society of Ireland (PSI) is the statutory body, established by the Pharmacy Act 2007, to regulate the practice and profession of pharmacy having regard to the need to protect, maintain and promote the health and safety of the public.

The PSI welcomes this opportunity to make a submission to the Department of Health's Public Consultation regarding access to certain prescription-only medicines in an effort to save life and reduce severe distress in emergency situations.

The current legislative controls clearly sets out certain circumstances under which an emergency supply of a medicine can be made by a pharmacist in a retail pharmacy business at the request of a doctor or at the request of a patient. However, it is recognised that the use of this legislation is restrictive, and may preclude supply in a situation when it is needed most (an emergency situation), for example where a patient has not been prescribed the medicine on a previous occasion and their doctor cannot be reached in the timeframe necessary to meet the urgency of the situation. Access to medicines in an emergency is largely time dependent, and a very small amount of time can mean the difference between life and death. The PSI would support a system which can increase access to and availability of certain medicines for use in emergency situations, preferably by persons trained in their use, in controlled situations, and believes that this could save lives and improve the quality of care provided to patients.

The PSI would like to provide the following comments in response to this consultation.

Safeguards and Infrastructure

In considering how legislation should be changed to facilitate increased access to these medicines the PSI would stress the need for a robust infrastructure to be put in place so that these medicines are supplied and used safely, in a way that achieves the purpose of potentially saving a life and reducing severe distress in an emergency situation. Any action taken in such an emergency should be undertaken without any unnecessary harm being caused to patients or members of the public. It is imperative that appropriate and robust training is given to anyone working in an environment where these medicines may need to be used including how to recognise signs and symptoms of these conditions, the appropriate administration of the medication and the necessity for follow-up

care. When considering the types of environments where access to these medicines may be needed, the potential hazards, the associated level of risk, and availability of other health services nearby should be taken into account.

Public Awareness and Information Campaign

The PSI would strongly support a public awareness campaign and education programme regarding potentially life-threatening medical conditions. It is important to raise awareness with the general public as a whole so that they can recognise the signs of an emergency and act to minimise the risk to these patients, initially through first aid and then through the administration of the appropriate medication if necessary, as well as follow-up with a healthcare professional. The PSI recommends that such a campaign would have an emphasis on self-care so that patients and their carers are empowered to take an active role in monitoring and controlling their own condition to the best of their ability in the first instance.

Pharmacist's Role

The PSI believes that pharmacists are in a prime position in the community to be authorised to supply the required medicines and in certain circumstances, where the appropriate course of action in the case presented to them is clear, to administer these medicines to patients in an emergency situation.

Pharmacists and pharmacies are easily accessible to patients and members of the public, with pharmacies available in all towns and cities in Ireland, and are generally open longer hours than other primary healthcare establishments. The medicines that pharmacies hold in the ordinary course of business might also be relied upon as a convenient means of holding the necessary stock, to be available in an emergency situation. As ordinary stock these medicines would be expected to be in date and should not require to be replaced and managed to ensure they remain in date and thus fit for purpose. While this may be the case for standard stock items, particular arrangements may need to be made for non-standard stock items.

Pharmacists are healthcare professionals with a wealth of knowledge on how medicines work and interact with other products. They use their knowledge on a daily basis to counsel and advise patients on their individual medicines and health concerns, as well as diagnose and treat minor ailments.

Pharmacists have demonstrated their competence in the safe provision of vaccine administration. In 2011, the legislation was amended to authorise pharmacists to administer the influenza vaccination as well as adrenaline in response to an allergic reaction caused by the influenza vaccination. As part of this service pharmacists are trained on proper vaccine administration and technique, as well as how to provide appropriate patient follow-up, and the necessary quality assurance and safety steps needed in order to deliver a safe and effective service. In order to provide vaccination services, pharmacists must also undertake a first aid course, which encompasses anaphylaxis management and CPR administration.

Patient access to the influenza vaccine increased following the introduction of this community pharmacy based vaccination service, which has improved public health through increased uptake of the vaccine. This has also broadened the public perception of the pharmacist's role and the

extended services that they can provide. This shows first hand that increased access to medicines can be safely supported through the use of appropriately trained community pharmacists.

Due to their accessibility and skillset, pharmacists could also play a key role in facilitating safe supply of the five medicines referred to in the consultation to other trained individuals in other settings, as deemed appropriate. Pharmacists have the skills and knowledge necessary to provide proper counselling before these products are supplied to a non-healthcare professional to help ensure their safe use.

Pharmacists are ideally placed to support the education of patients and enhance their awareness about these potentially life threatening conditions as part of a larger public health campaign. Pharmacists could contribute in a very positive way to such a campaign through their daily interactions with patients and members of the public in the community setting, both when providing counselling during supply of dispensed medicines and also in general interactions with the public. This also provides an opportunity for patients, should they require it, to access the support of a trained healthcare professional, in a private and confidential setting.

In Conclusion

The PSI broadly supports increasing access to the five medicines outlined in this consultation document in an effort to save life and reduce severe distress in emergency situations. The PSI would see pharmacists as being a key healthcare professional, outside the hospital environment, through which these medicines could be safely supplied and appropriately administered to a patient in an emergency situation, and also to facilitate supply of these medicines to non-healthcare professionals, as deemed appropriate.

**Pharmaceutical Society of Ireland
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