

19 February 2014

BC/ap

Control of Entry Arrangements
Scottish Government Health Directorate
Pharmacy and Medicines Division
1 East Rear
St Andrew's House
Regent Road
Edinburgh
EH1 3DG



Dear Sir/Madam,

Scottish Government consultation ISBN 9781784121594: A Consultation on the Control of Entry Arrangements and Dispensing GP Practices

I am writing to give my comments to the above consultation; I attach the completed Consultation Response Form with this letter as requested.

In recent years, my constituency has seen several applications for rural pharmacies and I have become increasingly concerned over the regulatory framework for the decision making process by the local Pharmacy Practices Committees. In my view, there are issues which need to be urgently addressed to make sure that future applications are considered in a more balanced way, and take significantly more information into account than at the present time.

I would suggest that the transparency of the current process needs to be scrutinised. This should be an open and inclusive process, taking into account the valid concerns and consideration of local residents in affected communities. Rural communities often have a unique way of life, and many who live in such areas are able to offer a vital contribution to how current systems work and how any change may cause significant issues to those living in the community. Interestingly in some recent rural pharmacy applications in my constituency, many of those who contacted me had previously been city dwellers, and were very clear and concise in communicating the different needs of rural communities and how particular Medical Practices were able to work well in accommodating their patients and understanding their needs within a rural setting.

Bruce Crawford (SNP) MSP Stirling constituency
Suite 3:3, Wallace House, Maxwell Place, Stirling, FK8 1JU
Telephone 01786 471899
E:mail: bruce.crawford.msp@scottish.parliament.uk

Stirling Constituency covers: City of Stirling, Bannockburn, Aberfoyle, Arnprior, Ardeonaig, Balfron, Balquhidder, Blanefield, Brig O'Turk, Buchlyvie, Balmaha, Callander, Cambusbarron, Cowie, Crianlarich, Croftamie, Deanston, Doune, Drymen, Fallin, Fintry, Gargunnoch, Gartmore, Inversnaid, Killearn, Killin, Kinlochard, Kippen, Lochearnhead, Milton of Buchanan, Plean, Port of Menteith, Rowardennan, Strathblane, Strathyre, Stronachlachar, Thornhill, Throsk, Tyndrum.

The issue of cross subsidy is also a real one in rural practice, and in most instances the services which the Practices provide and care they give their patients will suffer devastating effects with the loss of any dispensing services and the financial consequences. This can be evidenced by recent submissions I have sent to NHS Forth Valley PPC in relation to recent applications in Aberfoyle, Killin and Drymen. These areas have rural practices which are viewed as a 'one stop shop', and the loss of dispensing services would destabilise the Medical Centres in terms of the valuable services they are currently able to offer to patients. Examples given to me of chronic disease management, travel clinics, well woman clinics, venesection and abscess drainage are just some of the services which would be under threat by loss of cross subsidy.

It is further imperative that the expertise and views of the rural GP practices are taken into consideration during any application process and that the likely consequences of any proposals can be fully discussed. The GPs who work in these rural areas are the people who know and understand their patients' needs and the locale best, so it is vital that they are permitted to be heard by the PPC and are able to give any information and opinion which are relevant to any application.

I give these views in light of recent applications in my constituency and welcome your consideration of the above points in relation to this consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Crawford', with a small 'B.C.' monogram to the left.

Bruce Crawford MSP

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