

Do you think our proposed changes to this guidance will improve patient safety?

- Yes

Thinking specifically about the changes we are proposing, is there anything that:

- Is missing – No
- Should be amended – Yes

To ensure two-way communication between prescribers and the person seeking a medication, multiple communication methods should be made available for people to contact providers and vice versa. This is to ensure that services are accessible to as many people as possible and minimise situations where people are unable to access information or medications due to issues with communication.

Providers should also be required to provide information in formats such as easy read that are accessible to individuals with sensory processing disorders. This is especially important for information regarding consent to store people's data as well as information around the medications they are prescribed. This will also ensure that these services are available to as many people as possible and nobody is unable to get the medication they need due to accessibility issues.

- Should be removed – No

Do you think our proposals will have a positive or negative impact on individuals or groups who share any of the protected characteristics in the Equality Act 2010?

Age – Don't know

To ensure two-way communication between prescribers and the person seeking a medication, multiple communication methods should be made available for people to contact providers and vice versa. In the case of elderly people many may be assisted in accessing distanced pharmacy services by family members or care givers. It is therefore important for providers to ensure that they provide these people with the option to get in contact with them through several different methods such as over the phone to speak with them directly. Without this option, many older people will be unlikely to benefit from these changes.

Disability – Don't know

Following the proposed changes to the guidance around the data that these services collect, will services be required to provide information around the data they collect from users in accessible formats? If this is not the case these individuals will be unable to provide informed consent for providers to store their data.

Further to this issue, will providers be required to collect information regarding people's communication needs to ensure that all correspondence with these individuals is accessible for them. If this is not the case will providers be required to present all information and correspondence in accessible formats to ensure compliance with the accessible information standard?

Do you think our proposals will have a positive or negative impact on each of the following groups?

Patients and the public – Don't know

Within the guidance it is stated that services will be required to have a feedback procedure in place as well as information regarding where to voice concerns for specific issues. Further to this will services also be required to clearly provide information of their regulatory body so that in cases where concerns are not dealt with adequately by the provider people are aware of who they can contact? This is especially important for distanced pharmacies as many people may not be sure who regulates these services.

Within this proposed guidance it is stated that medications can still be provided to people who do not have a regular prescriber or have not provided consent to share information under 'exceptional circumstances'. Whilst it is stated that prescribers must make a clear record of their decision-making process, will it be required for providers to implement a dispute resolution/review process where this record is investigated by a third party in cases where people are not happy with the decision? If this is not the case how will these records be used to ensure that prescribers are making the correct decisions regarding what constitutes exceptional circumstances?