

Drug Death Prevention (Scotland) Bill

About You

Q1. Are you responding as:

An individual

Q2. Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

Professional with experience in a relevant subject

Optional: You may wish to explain briefly what expertise or experience you have that is relevant to the subject-matter of the consultation:

Academic and healthcare professional with expertise in liver and liver related disease and epidemiology.

Q3. Please select the category which best describes your organisation:

No Response

Q4. Please choose one of the following:

I am content for this response to be published and attributed to me or my organisation

Please provide your name or the name of your organisation. (Note: The name will not be published if you have asked for the response to be anonymous or "not for publication".)

Dr Thomas Drake

Q5. Please provide a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. (Note: We will not publish these contact details.)

XXXXXXXXXX

Q6. Data protection declaration

In order to proceed, please confirm that you have read and understood the Privacy Notice contained on Page 1

I confirm that I have read and understood the Privacy Notice to this consultation which explains how my personal data will be used.

Q7. If you are under 12 and making a submission, we will need to contact you to ask your parent or guardian to confirm to us that they are happy for you to send us your views.

No Response

Your Views On The Proposal

Q8. Which of the following best expresses your view of the proposed Bill? (please note this is a compulsory question)

Partially supportive

Please explain the reasons for your response.

The proposal of OPC are a short-term solution for urban areas for specific substances (i.e. diamorphine / heroin / opioids). I support the immediate aim of OPC, however, this does not go far enough to establish a comprehensive framework to support reduction in drug deaths. This approach may have some benefits in urban areas, but for other rural areas will OPCs be effective?

I would like to see more evaluation built into the bill - for example, testing the best delivery of OPCs and widening the accessibility of other interventions known to prevent drug related deaths (i.e. naloxone). There is a high level of emphasis around opioids - whereas other substances are often implicated (i.e. benzodiazapines).

OPCs will provide a tool for those who can access them - for opioids, but I would like to see a wider thought given to how other substances can be addressed. Can more be built into this with regards to community support and family support for those who are dependent on substances? Otherwise the bill will be simply a sticking plaster for drug deaths - which are fuelled by poverty and traumatic situations. Poverty rates are much much higher here compared to places where OPCs work.

Q9. Do you think legislation is required, or are there are other ways in which the Bill's aims could be achieved more effectively? Please explain the reasons for your response.

Needs much more focus on prevention, poverty and reducing inequalities. Have the bills aims been put to those who have substance misuse disorders? How will people access these services? Particularly in rural locations?

Q10. Which of the following best expresses your view of the proposal to establish overdose prevention centres?

Partially supportive

Please explain the reasons for your response.

Needs to be more focussed around prevention.

Q11. Which of the following best expresses your view of the proposal for a licensing regime to enable the establishment of overdose prevention centres?

Fully supportive

Q12. Which of the following best expresses your view of the proposal for a new body, the Scottish Drugs Deaths Council?

Partially supportive

Please provide reasons for your response, including views on the proposed functions of the SDDC (see pages 14 to 16 of the consultation document) and on how it should operate in practice.

Needs a more broad remit and evidence generating abilities (i.e. conducting and comissioning research studies and clinical trials). How will proposals for poverty reduction and reduction of inequality that drives drug dependency be made if at all? Will there be a mechanism that forces government to formall consider these and enact them or provide clear reasoning why not enacted?

Financial Implications

Q13. Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?

a significant reduction in costs

Please explain the reasons for your answer, including who you would expect to feel the financial impact of the proposal, and if there are any ways you think the proposal could be delivered more cost-effectively.

There will be a significant reduction in costs and harms to society. However, this bill needs to think more about prevention of drug dependency and factors underpinning this. However, research must be commissioned along with health economic analyses to identify these - an evidence based approach (contextual to scotland) with community engagement is essential. There is currently no mandatory engagement with those in affected families or those with drug dependency built into this bill - how otherwise will OPCs work if no buy in?

Equalities

Q14. Any new law can have an impact on different individuals in society, for example as a result of their age, disability, gender re-assignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

What impact could this proposal have on particular people if it became law? If you do not have a view skip to next question.

Please explain the reasons for your answer and if there are any ways you think the proposal could avoid negative impacts on particular people.

Potentially hugely beneficial - but how will those with disabilities etc. access drug treatment and OPCs?

Sustainability

Q15. Any new law can impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations.

Do you think the proposal could impact in any of these areas? If you do not have a view then skip to next question.

Please explain the reasons for your answer, including what you think the impact of the proposal could be, and if there are any ways you think the proposal could avoid negative impacts?

Needs strong evidence base and commissioning of clinical trials, health economic analyses and research.