

# 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".)

Academic with expertise 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:**

I am currently a research associate at King's College London, working on a realist evaluation of opiate substitution treatment and needle-syringe programmes. I have worked in addiction research for over 20 years. Addiction areas of interest: older people who use drugs, women who use drugs, drug overdose and fatalities.

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

*No Response*

Q4. Please choose one of the following:

I would like this response to be published anonymously

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 (Note: The name will not be published if you have asked for the response to be anonymous or "not for publication".)

XXXXXXXXXX

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)

Fully supportive

**Please explain the reasons for your response.**

I fully support a pragmatic and humane response to drug overdose which includes the establishment of Overdose Prevention Centres (OPC) across Scotland. OPCs offer safe access to sterile equipment and environments with trained workers who can react quickly to any adverse drug effects, including overdose. They further offer non-stigmatizing support and may encourage people who use drugs to access treatment provision, or at least offer information and signposting to support services.

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.

Unfortunately, I do think legislation is required to ensure all aims can be met without prejudice.

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

Fully supportive

**Please explain the reasons for your response.**

I fully support the proposal to establish Overdose Prevention Centres (OPC) across Scotland. OPCs offer safe access to sterile equipment and environments with trained workers who can react quickly to any adverse drug effects, including overdose. They further offer non-stigmatizing support, including health advice and support (e.g. injecting wound care and BBV testing/treatment) and may encourage people who use drugs not in contact with services to access treatment provision, or at least offer information and signposting to support services.

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

Neutral (neither support nor oppose)

**Please provide reasons for your response, including on the proposed conditions for licensing (see pages 12 to 14 of the consultation document) and on the proposal that health and social care partnerships are responsible for licensing and scrutinising OPCs?**

If no offence is being committed in an OPC then I think a licensing bill unnecessary and a temporal imposition Scotland can ill afford if it is serious about reducing overdose events. On the other hand, OPCs that are licensed would have a stronger statutory standing (I think) with the general public. I'm not sure about HSCPs having responsibility for licensing although I think they would be appropriate for oversight of OPCs.

My concern is the length of time it is going to take to establish OPCs through licensing processes (including the length of time it will take to read this bill and get it through the Scottish Parliament legislature).

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

Partially opposed

**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.**

The proposed SDDC does not appear as independent as the Bill suggests. Example: 'With membership of the SDDC being subject to parliamentary approval, it will ensure that the Council commands the support and confidence of parliament and is not viewed as a government quango...' What does it mean by 'every member subject to Parliamentary approval' - on what grounds is approval given (or not).

I strongly support the inclusion (as long as it's meaningful and not a token exercise) of people with lived experience on the membership body.

## 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?

some 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.**

I'm speculating but based on health economics of OPCs elsewhere, there should be a significant reduction in health care costs over a longer time period. In the short term, I'm not sure financial costs would be drastically reduced although what price a life? Indeed, what would be the costs of setting up OPCs in different areas (do we have estimates)? What would they cost to maintain and run? How much to set up and maintain the SDDC?

Depending on location, there could be detrimental financial impact on local businesses and (potentially) property owners.

Is there new money for the SDDC and ODCs or would they be funded by existing monies within Health

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?

and Social Care?

More information on how this will be financed is required I think.

## 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.

*No Response*

## 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?

Fewer people dying of preventable drug overdoses WILL CREATE a stronger, healthier, and more just society for future generations. How can we call ourselves a progressive society when we are failing people on a daily basis, simply because they seek oblivion (and/or pleasure) and what does the present situation say to the public - that we value some lives more than others?

Establishing OPCs in Scotland would demonstrate to the Scottish public (and UK) that we value everyone in our society, that every life matters. Establishing OPCs with meaningful input from people with lived experience would offer users of those services peers who understand, can help, and act as role models for those seeking to reduce their substance use or use more safely.