

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:

Addiction doctor

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

If you have requested anonymity or asked for your response not to be published, please give a reason. (Note: your reason will not be published.)

[Redacted]

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 (Note: The name will not be published if you have asked for the response to be anonymous or "not for publication".)

[Redacted]

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.)

[Redacted]

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.

I can see advantages of some aspects, but also have some reservations about others.

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.

Probably need legislation

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.

I agree that we need a wide range of services to tackle drug deaths in Scotland and I welcome the measures in the proposed Bill which would increase the tools available to help those at risk. They would potentially help to engage individuals with treatment and support and allow unmet needs to be addressed. Utilising lived experience in the centres and introducing services run by LEROs (lived experience recovery organisations) would help people move from the reduction of harms to the accrual of positives in their (and their families') lives.

Some caveats: As most overdoses do not take place in public places and even with several OPCs established, many of those who use drugs will not travel to them, the utility is always going to be limited. These services are expensive to run and cost-effectiveness is not clear which it needs to be when there are competing demands. It is likely to be life saving for a relatively small proportion of those at risk, but of course each life saved is precious. Experience elsewhere (where perhaps there have been large numbers of at-risk people using in city centres or in public places) does not necessarily translate simply into a Scottish setting.

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

Partially supportive

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?

Seems straightforward

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.

Feels a bit like a rearrangement of deck chairs. The direction of travel for the DDTO varied according to leadership as would a Drugs Death Council. Advisory bodies to SG on drug deaths policy which have had independence have not necessarily had their recommendations accepted and actioned (see Independent Expert Report on Opioid Replacement Therapies). Giving the body statutory clout may make a difference, but again, leadership and direction of travel may limit a comprehensive approach (see DDTF former perspective on recovery, abstinence and residential rehab for instance). The body may end up being limiting rather than freeing.

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 increase 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.

Expensive to run on a limited basis, but if it is to be comprehensive and part of a recovery oriented system of care, it would be significantly expensive. There are clearly potential savings to be made elsewhere, the issue is how these would be practically realised. Having fewer people develop BBV infections is something to be celebrated and means fewer people need treatment, but, for example, will this really allow BBV services to have a budget cut - if so, how? These theoretical savings in health and social care costs are difficult to realise on the ground. If it can be shown practically where the money can be saved, the case would be more convincing, otherwise feels like notional savings.

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?

No Response