

Royal College of Physicians of Edinburgh Response to the Consultation on the Proposed Drugs Death Prevention (Scotland) Bill.

[Proposed Drugs Death Prevention Scotland Bill | Scottish Parliament Website](#)

Your views on the proposal

Note: All answers to the questions in this section may be published (unless your response is “not for publication”).

Aim and approach

1. Which of the following best expresses your view of the proposed Bill? (please note this is a compulsory question)
 - Fully supportive
 - Partially supportive**
 - Neutral (neither support nor oppose)
 - Partially opposed
 - Fully opposed
 - Do not wish to express a view

Please explain the reasons for your response.

The Royal College of Physicians of Edinburgh (RCPE) welcomes this Bill proposal and considers that it is an important development that will help clarify and advance a range of issues in relation to the current important debate about the possible establishment of Overdose Prevention Centres (OPCs) in Scotland.

The RCPE is keen to continue to work positively with the Scottish Government, elected representatives from across the political spectrum, clinicians, experts, charities and all relevant stakeholders to develop practical measures that will help tackle Scotland’s urgent drug deaths crisis. We consider that a whole systems approach is essential.

Our 2021 report *Drug Deaths in Scotland: an increasingly medical problem*ⁱ emphasised the vital role of clinicians within that whole systems approach and set out a number of clinical approaches, recommending the introduction of a drugs consumption room and a heroin assisted treatment programme in all major centres in Scotland.

While we are generally supportive of this Bill proposal, some of our Fellows who have considered it- and they include leading experts in addiction medicine and clinical



toxicology- had a number of issues which they hope might be clarified and suggestions to strengthen the Bill proposal as the process moves forward. Some of these are detailed below in the sections below and the RCPE would be very happy to engage further with the Member during this process.

2. 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.

Our Fellows generally agreed that legislation is required here. It was considered that this would ensure services are set up within the law and reach certain standards which would in turn would protect users. Fellows considered the consultation paper set out effectively the case for legislation.

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

- Fully supportive**
- Partially supportive
- Neutral (neither support nor oppose)
- Partially opposed
- Fully opposed
- Do not wish to express a view

Please explain the reasons for your response.

As indicated in our first answer above, the RCPE has for some time now supported the introduction of OPCs as a part of a range of measures in response to drug deaths in Scotland.

The RCPE recognises that there is considerable and substantial evidence internationally that the OPC approach is effective in preventing drug deaths and, crucially, offering drug users the opportunity to connect with a range of other support services. Safe drug consumption rooms have been operating in Europe for around three decades and evidence exists that such facilities also help to reduce both drug use in public places, and the prevalence of discarded needles.

Some Fellows raised questions over the most appropriate model of OPCs, pointing out that many European examples are regional or centrally situated. It was suggested that every specialist drug clinic should allow safer injecting and that this would be integrated with other services, locally funded and relatively small scale and, further, that this would be cost effective if included in a general service.



A number of Fellows emphasised that the primary focus of OPCs in Australia and Europe was initially safer injecting to reduce transmission of blood borne viruses (BBV). One Fellow suggested that, given the continuing unmet need for BBV harm reduction, it would be useful to understand more about the envisaged role of OPCs in that regard.

In addition, Fellows stated they would welcome clarification in terms of the approach to prescribing safer alternatives which may help reduce overdose frequency. Additional detail would also be welcomed by Fellows on the anticipated management of people with addictions in OPCs when intoxicated in relation to how and when it was deemed they required to be transferred to emergency departments for treatment.

Finally, it was considered that the Bill proposal would be strengthened with an added focus on policy evaluation which was an important feature when Scotland's National Naloxone Programme was developed. Consulting experts in study design and biostatistics may be highly beneficial in this regard.

4. 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**
- Partially supportive
- Neutral (neither support nor oppose)
- Partially opposed
- Fully opposed
- Do not wish to express a view

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

The RCPE considers that it is logical and appropriate for a licensing regime to be established. This will ensure OPCs are set up to operate at certain standards and protect providers and users while also making it more attractive for health and social care staff to work in OPCs.

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

- Fully supportive
- Partially supportive**
- Neutral (neither support nor oppose)



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- Partially opposed Fully
- opposed
- Do not wish to express a view

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

Most Fellows were supportive of the proposed Scottish Drug Deaths Council and its proposed functions and felt it would be beneficial for this body to be set in statute. Fellows would welcome more detail about how it would work with Scottish Ministers and protocol around disagreements in the event of the Council's proposals not being supported by Ministers. In addition it was considered that it may be useful to build in some evaluation of the Council.

Financial implications

6. 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
- some increase in costs
- no overall change in costs**
- some reduction in costs
- a significant reduction in costs
- skip to next question

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.

Fellows had a range of views about the financial costs of the proposal and consider it is challenging to predict precisely the financial implications. There was an acceptance that there would be set up and running costs but also an understanding that the successful operation of OPCs could lead to savings, for example in relation to a decrease in the number of cases of HIV and the associated treatment requirements.

Equalities

7. 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.

Given the rates of drug misuse are higher in areas of deprivation, the RCPE considers that the proposal for OPCs is of even greater importance in these communities relative to others.

Sustainability

8. 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?

The RCPE considers that this proposal is sustainable and has the potential to make our communities safer and healthier and save lives.