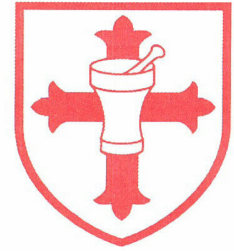

GHP

*Guild of
Healthcare
Pharmacists*



Roy Drepaul
MHRA
Room 16/139Market Towers
1, Nine Elms Lane
London SW8 5NQ

23rd September 2008

Dear Mr Drepaul

MLX 348: Proposal for Amendments to Medicines Legislation to Allow Supply and Administration of Medicines by Members of the Armed Forces

Response from the Guild of Healthcare Pharmacists

Thank you for the opportunity to respond to this consultation. The Guild of Healthcare Pharmacists represents UK wide around 4,000 pharmacists including the majority of hospital pharmacists, pharmacists employed by Primary Care Trusts (PCTs), pharmacists employed by other public bodies such as the Commission for Social Care Inspection and the Healthcare Commission and a few pharmacists employed in the armed forces. The Guild is part of the health sector of the union Unite.

We understand that it is important to ensure that first line emergency drugs are available for members of the armed forces where needed, and that they can be administered in a legal manner. We welcome the move to try to address the legal issues. However, the proposals need to be more specific in terms of training of staff in medicines use and in which drugs may be used, in order that practice is as safe as it can be under very difficult circumstances to protect those who are injured or ill.

The number of drugs which need to be given first line is relatively few. Environmental conditions in combat situations may affect drugs adversely. Regulations should stipulate that only a minimum list of immediately essential drugs may be supplied or administered by anyone not legally allowed to do so in civilian life. A list of suitable first line drugs covering different situations should be drawn up by the Surgeon General and updated regularly in line with best practice.

President: Richard Cattell

Professional Secretary: Jean Curtis, 6, The Sycamores, Bishops Stortford, Herts CM23 5JR
Tel / fax: 01279 831685 Mobile: 07979 245346 Email: Jeancm23@aol.com Website: www.ghp.org.uk

Any person who is to carry and/or administer a drug should be trained in how to use and side effects etc. For the particular case quoted, morphine auto-injectors for use in battlefield analgesia, this should have a legal basis, with so far as is possible guarding against potential abuse.

Medical assistants should undergo accredited courses (either the current unaccredited course elements should be accredited or accredited courses should be used for training or a combination of both) and they should have a legal basis for using drugs similar to ambulance paramedics.

We hope these comments are of assistance

Our reply may be made freely available.

Yours sincerely

Jean Curtis

Jean Curtis
Professional Secretary