

## Proposal to extend medicines for optometrists and contact lens opticians Response

### Proposal 1: remove medicines that have been discontinued

The following medicines have been discontinued and are no longer available to be sold or supplied in the UK:

- emedastine
- levocabastine
- nedocromil sodium
- polymyxin B/bacitracin
- polymyxin B/trimethoprim
- sulphacetamide sodium
- thymoxamine hydrochloride

Do you agree or disagree with the proposal to remove these medicines from the HMRs on the basis that they have been discontinued and are no longer available to be sold or supplied in the UK?

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Please provide further information to support your answer. (Optional, maximum 150 words)**

As these medicines have been discontinued and are no longer available to be sold or supplied in the UK, we agree with their removal from the list. There needs to be clear easily accessible information for patients who have previously used these products about how to access new more suitable medicines, and how to safely dispose of any unused medicines they may possess.



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Company Registration No: 08440757

## **Proposal 2: allow all optometrists to supply POMs currently restricted to AS optometrists**

The following questions are about enabling optometrists to sell and supply specific POMs so that they can manage patients in the community and eliminate the need for unnecessary onward referral to other healthcare professionals.

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply acetylcysteine in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply atropine sulphate in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply homatropine hydrobromide in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*



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**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply azelastine hydrochloride in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply ketotifen in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply olopatadine in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply lodoxamide in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*



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**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply sodium cromoglycate in preparations that are larger than 10ml in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply pilocarpine hydrochloride in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply pilocarpine nitrate in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply diclofenac sodium in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*



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**Please provide further information to support your answer. (Optional, maximum 150 words)**

We agree with the proposals to allow all optometrists to supply these POMs to the public. We often hear from people in our area frustrations at delays getting the medicines they need if they have to be referred on to other services and feel people will appreciate getting these medicines as quickly and as easily as possible. We are aware that all optometrists receive training about these medicines and their suitability and contraindications for use, however we would welcome clear guidance being issued about suitable treatment pathways for patients who an optometrist may not feel comfortable treating in the community because of comorbidities or other medicines used. We would also like clear feedback routes for patients being managed in the community by optometrists, to feedback about their care, and for this feedback to be acted upon appropriately, including complaints routes.

### **Proposal 3: allow CLOs to supply POMs currently restricted to AS optometrists**

**The following questions are about enabling CLOs to sell and supply specific POMs so that they can manage patients with allergic eye disease in the community and eliminate the need for unnecessary onward referral to other healthcare professionals.**

**Do you agree or disagree with the proposal to allow all CLOs to provide a signed order for, or directly sell and supply azelastine hydrochloride in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all CLOs to provide a signed order for, or directly sell and supply ketotifen in an emergency?**

- **Agree**



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- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all CLOs to provide a signed order for, or directly sell and supply olopatadine in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Please provide further information to support your answers. (Optional, maximum 150 words)**

As with previous answers we agree with these proposals but would ask that clear guidance is given for suitable treatment pathways for patients who are not able to be treated in the community, and that clear feedback and complaints routes are communicated to and are easily accessible to patients who are treated in the community.

### **Proposal 4: allow optometrists to supply new POMs to treat conjunctivitis**

**The following questions are about enabling optometrists to sell and supply specific POMs so that they can manage patients in the community with forms of conjunctivitis and eliminate the need for unnecessary onward referral to other healthcare professionals.**

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply azithromycin in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*



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**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply gentamicin in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal to allow all optometrists to provide a signed order for, or directly sell and supply epinastine in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Please provide further information to support your answers. (Optional, maximum 150 words)**

As with previous answers we agree with these proposals but would ask that clear guidance is given for suitable treatment pathways for patients who are not able to be treated in the community, and that clear feedback and complaints routes are communicated to and are easily accessible to patients who are treated in the community.

## **Proposal 5: allow CLOs to supply new POMs to treat conjunctivitis**

**The following questions are about enabling CLOs to sell and supply specific POMs so that they can manage patients in the community with forms of conjunctivitis and eliminate the need for unnecessary onward referral to other healthcare professionals.**

**Do you agree or disagree with the proposal that CLOs should be able to provide a signed order for or directly sell and supply gentamicin in an emergency?**

- **Agree**



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- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Do you agree or disagree with the proposal that CLOs should be able to provide a signed order for or directly sell and supply epinastine in an emergency?**

- **Agree**
- *Neither agree nor disagree*
- *Disagree*
- *Don't know*

**Please provide further information to support your answers. (Optional, maximum 150 words)**

As with previous answers we agree with these proposals but would ask that clear guidance is given for suitable treatment pathways for patients who are not able to be treated in the community, and that clear feedback and complaints routes are communicated to and are easily accessible to patients who are treated in the community.

### **Proposal 6: allow wholesalers to supply specified topical anaesthetics to CLOs**

**This question is about enabling wholesalers to supply the following 3 topical anaesthetics to CLOs for use during the course of their professional practice:**

- **lidocaine hydrochloride**
- **oxybuprocaine hydrochloride**
- **proxymetacaine hydrochloride**

**Do you agree or disagree with the proposal to allow wholesale suppliers to supply CLOs with these 3 topical anaesthetics for use during the course of their professional practice?**

- **Agree**
- *Neither agree nor disagree*



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- *Disagree*
- *Don't know*

**Please provide further information to support your answer. (Optional, maximum 150 words)**

N/A

## **Legal considerations**

**In considering the amendments to the HMRs, ministers must comply with the public sector equality duties. In Northern Ireland, new policies must also be screened under section 75 of the Northern Ireland Act 1998. In addition, new or revised policies must be rural proofed in line with the Rural Needs Act (Northern Ireland) 2016.**

**Protected characteristics under the Equality Act 2010 are:**

- **age**
- **disability**
- **gender reassignment**
- **marriage and civil partnership**
- **pregnancy and maternity**
- **race**
- **religion and belief**
- **sex**
- **sexual orientation**

**The Department of Health and Social Care (DHSC) and the Department of Health in Northern Ireland (DoH (NI)) do not consider that these policy proposals will create inequalities or adversely impact individuals with protected characteristics.**

**Do you agree or disagree with the view of DHSC and DoH (NI) on the impact these policy proposals will have on individuals with protected characteristics?**



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- Agree
- Neither agree nor disagree
- **Disagree**
- Don't know

**Please provide further information to support your answer. (Optional, maximum 150 words.)**

Whilst extending access to these medicines and reducing delays to obtaining them offer clear benefits for patients who are able to be treated in the community, we are concerned about the potential for worsening inequalities in these proposals. Eye health inequalities are known about for patients who are not able to access community optometrists due to deprivation or because of other access issues, detailed in research published by the [General Optical Council](#) in July this year. These proposals risk creating a two tier system for these patients, without more work being done to address these access issues. We are also concerned about the cost of these medicines being a barrier for those who are on a low income or face deprivation. Coverage of these medicines within NHS needs to be examined to address this.

### **Question for respondents who live or work in Northern Ireland**

**DoH (NI) does not consider that these policy proposals will impact people differently with regard to where they live geographically in Northern Ireland.**

**Do you agree or disagree with the view of DoH (NI) about the impact these policy proposals will have on where people live geographically in Northern Ireland?**

- Agree
- Neither agree nor disagree
- Disagree
- **Don't know**

**Please provide further information to support your answer. (Optional, maximum 150 words)**

N/A



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