



Community
Pharmacy
Scotland

**Community Pharmacy Scotland response to:
Ending Period Poverty**

A proposal for a Bill to ensure free access to sanitary products, including schools, colleges and universities.

Prepared by:

Amanda Rae
Head of Policy & Development
amanda.rae@cps.scot

Who are Community Pharmacy Scotland (CPS) & what do they do?

Who we are

We are the organisation which represents community pharmacy contractor owners in almost every aspect of their working lives, and are the voice of these vital healthcare professionals as they deliver pharmaceutical care to the people of Scotland.

We are empowered to represent the owners of Scotland's 1256 community pharmacies and negotiate on their behalf with the Scottish Government. This covers all matters of terms of service and contractors' NHS service activity including remuneration and reimbursement for the provision of NHS pharmaceutical services.

What we do

We work with the Scottish Government on the development of new pharmaceutical care services and ensure that the framework exists to allow the owners of Scotland's community pharmacies to deliver these services.

The Scottish community pharmacy contract puts the care of the individual right at its centre and with its focus on pharmaceutical care and improving clinical outcomes, community pharmacy contractors and their employee pharmacists are playing an increasingly important role in maximising therapeutic outcomes and improving medicine safety. Community pharmacy is at the heart of every community and plays an important part in the drive to ensure that the health professions provide the services and care the people of Scotland require and deserve.



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A proposal for a Bill to ensure free access to sanitary products, including schools, colleges and universities.



Aim and Approach

1. Which of the following best expresses your view of the proposed bill?

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

Please explain the reasons for your response.

Period Stigma

CPS are supportive of contributing to the removal of the stigma and silence around menstruation which remains a significant cultural barrier to successfully addressing this issue.

Education

CPS are fully supportive of the need to address period poverty to ensure women and girls do not miss work/school/college because they cannot afford sanitary protection.

The negative long-term impact on attendance rates, educational outcomes and physical health are not acceptable and need to be addressed.

Health Issue

SH have stated that this is not a health issue, and that foodbanks can be a source of sanitary protection for women and girls on low incomes. CPS do not agree that this is currently a source of these products – foodbanks rely on donation therefore there is no guarantee sanitary products will be available, and there are barriers to access to foodbanks as referral from a social worker, GP or other professional is required.

Access to sanitary products is a basic human right, of which CPS are supportive.

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The funding for the procurement of products, staffing for the distribution and potential transitional costs is deemed to “fall on the Scottish Government, via allocation to local authorities, health boards and participating partners for procurement of the products.

This is a major issue, and will determine the success or failure of the service and needs to be addressed at this stage in the process.

Crucially, there is no way at this stage to gauge the “size” that the proposed service may grow to. This would inform not only feasibility of potential distribution routes, but the cost and sustainability of the service as a whole. If funding is available, we would suggest that a pilot is set up following the analysis of this consultation, using the opinions gathered to set clear parameters for supply and trial service delivery in an area broadly representative of Scotland as a whole. Only then could a full and detailed Bill be brought before Parliament with confidence that its requirements can be fulfilled for the women of Scotland in a robust manner.

Universal provision of sanitary products

2. Do you think a universal, card-based system (modelled on the C-card system for free condoms) would be an effective means of providing sanitary products for free to those who need them?

- Yes
- Unsure
- No** ✓

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Please explain the reasons for your response.

The uptake of sanitary wear is likely to be greater than that of the C Card, which is a relatively small project run across seven health boards (Ayrshire & Arran, Borders, Dumfries & Galloway, Highland, Lanarkshire, Lothian and Tayside) in limited outlets, with limited promotion. The awareness of sanitary wear project is likely to be higher, and a higher than 20% access is likely.

In addition, the products are bulkier and harder to store. There is no funding to the distributor for the C Card. This is not an option for sanitary wear.

CPS suggest a model

- Monthly payment for distributors (£50)
- Fee per transaction (£1) (Plus reimbursement of wholesale costs for stock if procurement is not carried out centrally by NHS/SG)
- Limited range of products available to control costs and make service efficient and deliverable.
- Claims made electronically, recording similar to NEO.

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3. Which of the following best expresses your view in relation to a card based system?

- ❖ The card should be available to anyone; card-holders should have unlimited access to free sanitary products
- ❖ The card should be available to anyone; its use should be restricted (e.g. by limiting the number of products that may be claimed each month)
- ❖ The card should be available only to those on low incomes or in receipt of benefits; card-holders should have unlimited access to free sanitary products
- ❖ The card should be available only to those on low incomes or in receipt of benefits; its use should be restricted (e.g. by limiting the number of products that may be claimed each month)
- ❖ There is no need for a card scheme
- ❖ **Other (please specify)** ✓

Please explain the reasons for your response.

The service should be available to everyone, with a restricted product range available across Scotland in a universal formulary. There should be a generous upper limit of products available. (like GFFS though with only one formulary list).

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4. Do you have a view on which locations would be most suitable for dispensing free sanitary products (e.g. GP surgeries, pharmacies, community centres, health clinics)?

CPS are supportive of community pharmacies distributing free sanitary products. This would be supported by the ease of access to community pharmacies (locations, opening hours). However, this would incur an immediate and significant cost in terms of training, stockholding, infrastructure (IT, storage facilities) and staff time spent administering the service. We are wholeheartedly in support of the proposals, but must highlight that whichever operational model is chosen, community pharmacy businesses would have to be reimbursed and remunerated fairly in order to break even.

Schools, colleges and universities

5. Do you agree that there should be specific obligations on schools, colleges and universities to make sanitary products available for free (via dispensers in toilets)?

Yes ✓

Unsure

No

Please explain the reasons for your response.

As per above

CPS are fully supportive of the need to address period poverty to ensure women and girls do not miss work/school/college because they cannot afford sanitary protection.

The negative long-term impact on attendance rates, educational outcomes and physical health are not acceptable and need to be addressed.

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**Personal experience (questions 6 and 7 are for individual respondents only)
These have not been answered by CPS.**

~~6. Have you ever struggled to access or afford sanitary products during menstruation? (e.g. financial barriers, unexpected circumstances, health issues)~~

~~◆ Yes, frequently ◆ Yes, occasionally ◆ No ◆ Not applicable: I do not need or use sanitary products ◆ I prefer not to say~~

~~Please explain or give an example of your experience if you feel able to do so.~~

~~7. If sanitary products were available for free, which of the following would apply to you?~~

~~◆ I would expect to claim free products regularly ◆ I would expect to claim free products occasionally ◆ I would not expect to claim free products ◆ Not applicable: I do not need or use sanitary products ◆ I prefer not to say~~

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

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Financial implications

8. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

(a) Government and the public sector (e.g. local authorities, the NHS)

Significant increase in cost ✓

Some increase in cost

Broadly cost-neutral

Some reduction in cost

Significant reduction in cost

Unsure

(b) Colleges and universities

Significant increase in cost ✓

Some increase in cost

Broadly cost-neutral

Some reduction in cost

Significant reduction in cost

Unsure

(c) Businesses (including suppliers/retailers of sanitary products)

Significant increase in cost

Some increase in cost

Broadly cost-neutral

Some reduction in cost

Significant reduction in cost

Unsure ✓

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(d) Individuals (including consumers of sanitary products)

- ❖ Significant increase in cost
- ❖ Some increase in cost
- ❖ Broadly cost-neutral
- ❖ Some reduction in cost
- ❖ **Significant reduction in cost** ✓
- ❖ Unsure

Please explain the reasons for your response.

There will be an immediate increase in costs for the government, public sector, local authorities and colleges and universities in the provision of products free of charge. There will be longer term benefits of keeping women and girls in education and work without interruption due to period poverty, which would need to be assessed over time.

Businesses experience will vary, depending on the individual business.

Businesses participating in the new service should largely break even as the cost of service will be covered by the remuneration.

Businesses who sell sanitary wear (for example supermarkets) will see a reduction in their income, which may result in a reduction of the availability of these product ranges for sale.

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9. Are there ways in which the Bill could achieve its aim more cost effectively (e.g. by reducing costs or increasing savings)?

Offering a clear, effective, limited range of products will ensure cost effectiveness of the delivery.

Equalities

10. What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation?

- Positive** ✓
- Slightly positive
- Neutral (neither positive nor negative)
- Slightly negative
- Negative
- Unsure

Please explain the reasons for your response.

CPS support this as a totally positive move to reduce gender, age and income inequalities.

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Sustainability

12. Do you consider that the proposed bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

- Yes
- No
- Unsure** ✓

Please explain the reasons for your response.

The Bill will have positive effects of keeping women and girls in education and work without interruption due to period poverty, which would need to be assessed over time.

The set up and operation of the service requires significant further consultation, engagement and discussion

General

13. Do you have any other comments or suggestions on the proposal?

None.