



Wales Safer Communities Network response to: Department of Health & Social Care: Proposals to expand access to take-home naloxone supplies Closed 06 March 2024

Electronic response submitted: 06 March 2024

Questions:

In what capacity are you responding to this survey?

- On behalf of an organisation

What is the name of your organisation?

- Wales Safer Communities Network (hosted by WLGA)

Which is the best description of the type of organisation that you represent?

- Other: Wales Safer Communities Network (hosted by WLGA) representing: 22 Councils, 4 OPCC, 4 Police Forces, 3 FRSs, Probation in Wales, PHW, 3rd Sector, WLGA and WG.

What is your role in the organisation

- Business and Network Development Manager

What is your email address?

- SaferCommunities@WLGA.gov.uk

Route 1:

We are proposing that a number of services and professionals are named in the legislation and directly given the enabling power to supply naloxone without a prescription.

The services and professionals we are proposing to be named in the legislation are:

- drug and alcohol treatment services (who already have this power)
- medical services of the armed forces
- police forces, including drug treatment workers commissioned to work in these settings
- prison officers (orderly officers and duty governors)
- probation officers
- registered midwives
- registered nurses
- registered pharmacy professionals
- registered paramedics



To what extent do you agree or disagree with the proposed list of named services and professionals that can supply naloxone without a prescription?

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

To what extent do you agree or disagree that the training requirements for named services and professionals should include the storage and supply of naloxone, as well as how to support those supplied with naloxone with its storage and administration?

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Please explain your answer:

The Network would strongly support full and comprehensive training for all named services and professionals to ensure that the naloxone being provided has been stored appropriately and that the advice being administered (including how to store safely at home) is appropriate, with resources and explanations that are accessible (clear, easy to read information) and in appropriate languages (including Welsh) for all service users.

If naloxone is stored inappropriately (pre or post supply) there is a risk that the naloxone will not be as effective or may not work as intended and as such those in a position of storing and supplying should be fully aware of how to manage the substance and be able to share this information clearly to enable the naloxone to be reliably safe to use.

The Network would like to recognise that whilst the list of named services and professionals highlighted previously is comprehensive, we understand that the Welsh Government would not be able to add people to this list if set in legislation. We feel therefore that this is restrictive and reduces the opportunities to make naloxone available in areas that may be identified as being most suitable, for example at hostels, which would be an essential supplier for naloxone at home. Having a set list has the potential to prohibit the ability to be flexible and reactive to opportunities with partner agencies.



Route 2:

The draft legislation enables the UK Government and the devolved administrations to select an organisation or multiple organisations that will act as a supply network co-ordinator and hold the register for a supply network in that part of the UK.

Any service or organisation that wants to supply naloxone without a prescription will be able to register with the network co-ordinator, providing they meet certain conditions.

To what extent do you agree or disagree with enabling services and organisations to supply naloxone without a prescription, through the registration route?

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Please explain your answer:

As a Network we would endorse Route 2 over Route 1 as it would allow for Wales to have a network coordinator in each area. There are many examples of area leads in Wales such as Harm reduction leads so this process is not new and would be relatively straight forward to implement with limited impact. By having a coordinator role it would allow for flexibility to register services, such as hostels, but with appropriate local knowledge and accountability and scrutiny.

The registration route feels appropriate and allows the area coordinator to manage what service provision will best serve their local areas which will inevitably provide greater availability of naloxone to those who need it. The Network anticipate that this approach would also allow for a clearer accountability and governance of supply and will help in the management of data collection.

If you think there are any other requirements that services under route 2 should meet to ensure safe supply of naloxone, please outline them

- No further comment

If you think there are other requirements that non-public or statutory services and organisations under route 2 should meet to ensure safe supply of naloxone, please outline them.

- No further comment



It is important that we have a good understanding of how much naloxone is being supplied, so we can analyse the possible impacts on drug-related deaths. This will be particularly important if there are multiple routes for supply, because it will enable policy makers across the UK to better understand what routes are more effective and where more work can be done.

In addition to the training requirements, we are also proposing data reporting on the supply of naloxone using a legislative gateway for named services and professionals. This type of gateway is a legal provision that gives statutory authority for information sharing by these services and professionals.

To what extent do you agree or disagree that the named services and professionals that supply naloxone to individuals should be provided with a legislative gateway to support the sharing of data on the supply of naloxone?

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you have any further comments on the detail of the draft legislation, please outline them.

- No further comment

If you think the proposals risk impacting people differently, or could impact adversely on any of the protected characteristics covered by the public sector equality duty set out in section 149 of the Equality Act 2010 or by section 75 of the Northern Ireland Act 1998, please outline them:

- No further comment