

Proposed Sanitary Products (Free Provision) (Scotland) Bill

Page 2: About you

Are you responding as an individual or on behalf of an organisation?

on behalf of an organisation

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

No Response

Please select the category which best describes your organisation

Representative organisation (trade union, professional association)

Please choose one of the following; if you choose the first option, please provide your name or the name of your organisation as you wish it to be published.

I am content for this response to be attributed to me or my organisation

Please insert your name or the name of your organisation. If you choose the first option above, this should be the name as you wish it to be published. If you choose the second or third option, a name is still required, but it will not be published.

Amanda Rae, Head of Policy and Development, Community Pharmacy Scotland (CPS)

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. We will not publish these details.

Page 7: Your views on the proposal

Q1. Which of the following best expresses your view of the proposed Bill?

Partially supportive

Q1. Which of the following best expresses your view of the proposed Bill?

Please explain the reasons for your response

Community Pharmacy Scotland (CPS) are supportive of the aims and objectives of the proposal, however the proposed mechanism of the delivery, which, in our opinion, needs further significant work. 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. Finance The proposal is insufficient here. 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.

Page 8: Universal provision of sanitary products

Q2. 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?

No

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 (e.g.£50) • Fee per transaction (e.g. £1) plus reimbursement of wholesale costs for stock if procurement is not carried out centrally by the NHS/Scottish Government • Limited range of products available to control costs and make service efficient and deliverable. • Claims made electronically, recording similar to the NEO system for needle exchange.

Q3. Which of the following best expresses your view in relation to a card-based system?

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 the Gluten Free Food Service though with only one formulary list).

Q4. 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.

Page 11: Schools, colleges and universities

Q5. 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

Please explain the reasons for your response

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.

Page 12: Personal experience (questions 6 and 7 are for individual respondents only)

Q6. Have you ever struggled to access or afford sanitary products during menstruation? (e.g. financial barriers, unexpected circumstances, health issues)

No Response

Q7. If sanitary products were available for free, which of the following would apply to you?

No Response

Page 14: Financial implications

Q8. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

	Significant increase in cost	Some increase in cost	Broadly cost-neutral	Some reduction in cost	Significant reduction in cost	Unsure
(a) Government and the public sector (e.g. local	X					

Q8. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

authorities, the NHS)						
(b) Colleges and universities	X					
(c) Businesses (including suppliers/retailers of sanitary products)						X
(d) Individuals (including consumers of sanitary products)				X		

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.

Q9. 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

Page 16: Equalities

Q10. 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

Please explain the reasons for your response

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

Q11. In what ways could any negative impact of the proposed Bill on equality be minimised or avoided?

No Response

Page 18: Sustainability

Q12. Do you consider that the proposed Bill can be delivered sustainably i.e. without having likely future disproportionate economic, social and/or environmental impacts?

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

Page 19: General

Q13. Do you have any other comments or suggestions on the proposal?

Nothing further to add.