

Extend medicines for optometrists and contact lens opticians - consultation document

About you

In what capacity are you responding to this survey?

- An individual sharing my personal views and experiences
- An individual sharing my professional views
- On behalf of an organisation

Questions for individuals

What is your age? (Optional)

- Under 13
- 13 to 15
- 16 to 24
- 25 to 34
- 35 to 44
- 45 to 54
- 55 to 64
- 65 to 74
- 75 or above
- Prefer not to say

What is your sex? (Optional)

- Male
- Female
- Prefer not to say

Where do you live in the UK?

- England
- Scotland
- Wales
- Northern Ireland

- ☐ Live outside the UK

Questions for professionals

What best describes your profession?

- ☐ Optometrist
- ☐ Optometrist with a medicine prescribing qualification (for example, an independent prescribing or additional supply qualification)
- ☐ Dispensing optician
- ☐ Dispensing optician with a contact lens specialism
- ☐ Ophthalmologist
- ☐ Orthoptist
- ☐ General practitioner (GP)
- ☐ Pharmacist
- ☐ Other health care professional
- ☐ Other non-health care professional

Where do you practise in the UK?

- ☐ England
- ☐ Scotland
- ☐ Wales
- ☐ Northern Ireland
- ☐ Outside the UK

What best describes the setting you work in?

- ☐ Primary care
- ☐ Secondary care or other equivalent hospital provider
- ☐ Primary and secondary care
- ☐ Other, please specify

Questions for organisations

What is the name of the organisation you are responding on behalf of? Pharmaceutical Society NI

What type of organisation are you responding on behalf of?

- Professional membership body
- Optical practice providing NHS sight testing services
- Optical practice providing NHS sight testing services and enhanced eye care services
- Optical practice providing entirely private services
- **Regulatory body**
- General practice
- Pharmaceutical
- Hospital trust
- Integrated care board
- Voluntary sector or patient group
- Other healthcare provider
- Other, please specify

Where does your organisation operate or provide services? Select all that apply:

- England
- Wales
- Scotland
- **Northern Ireland**
- The whole of the UK
- Outside the UK

What is your job title? **Interim Senior Policy Officer**

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)

The Society agrees with removing these discontinued medicines from the HMRs. As they are no longer available for supply in the UK, retaining them serves no regulatory purpose and may create uncertainty for practitioners. Removing them will ensure the legislation reflects current clinical practice, reduces ambiguity for prescribers and suppliers, and supports clear governance. This amendment helps maintain an accurate, up-to-date medicines framework that promotes patient safety and avoids confusion in clinical decision-making.

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

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

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

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

The Society supports widening supply to all optometrists where this enhances timely access, avoids unnecessary onward referral, and is supported by appropriate training and competence standards. The medicines listed are well-established in ocular care and can be used safely by practitioners with the relevant skills. We emphasise the need for clear governance arrangements, shared-care communication with GPs and pharmacists, and consistent local protocols to support safe use.

The Society also stresses the importance of robust labelling and patient-information safeguards, ensuring instructions for use are clear, durable, and not easily lost. This will help patients understand how to use their medicines correctly and maintain adherence, particularly for short-course treatments.

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
- 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)

The Society supports enabling CLOs to supply these medicines for allergic eye disease where they are appropriately trained and practising within defined clinical pathways. These products have a well-established safety profile and are frequently used at the first point of presentation. Clear guidance, clinical supervision arrangements, and good communication with pharmacists and optometrists will be essential to ensure consistent care.

The Society also highlights the need for robust labelling and patient-information safeguards, ensuring dosing instructions are clear, durable, and cannot be easily misplaced. This will help patients understand exactly how to use their medicines and support adherence throughout the treatment course.

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

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)

The Society agrees with extending the supply of these medicines to optometrists in emergency situations, as this can support faster access to treatment and reduce pressure on other services. We highlight the importance of antimicrobial stewardship principles, clear diagnostic criteria, appropriate training and competency, and strong communication with other healthcare providers.

Given that optometrists do not have access to shared care records, the Society emphasises the need for robust and routine checks of patient allergies and sensitivities to ensure safe decision-making and avoid avoidable harm.

Governance mechanisms should ensure safe prescribing, accurate recording, and appropriate follow-up.

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

- 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)

The Society supports this proposal provided that CLOs operate within robust governance frameworks, demonstrate appropriate training, and follow defined clinical pathways. Access to treatment at the first point of presentation may reduce delay and improve patient experience. However, the introduction of antimicrobials such as gentamicin requires careful stewardship and good communication between CLOs, pharmacists, and optometrists to ensure continuity of care and appropriate review.

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
- Disagree
- Don't know

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

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?

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

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

The Society agrees that the proposals are unlikely to have a differential impact on individuals with protected characteristics. Expanding access to appropriate eye care may in fact support equity by reducing delays and unnecessary referrals. Provided that services remain accessible and training standards are applied consistently across all professional groups, no adverse equality implications are anticipated.

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)

The Society agrees that no significant geographical inequality is anticipated. Enabling optometrists and CLOs across Northern Ireland to supply a broader range of treatments may improve access in rural and underserved areas by reducing travel and delays in referral pathways. Implementation should ensure consistent training and governance, but no negative rural impact is foreseen.