

Summary

1. This Memorandum advises on the following:
 - An update on COVID-19 – Scotland’s Strategic Framework;
 - Supply and usage of NHS Scotland Personal Protective Equipment (PPE);
 - An update on the position regarding GOS(S)1 ‘cheque book’ forms;
 - Clarification on the issuing of a written prescription or statement following an eye examination;
 - The issue of GOS(S)3 forms for use by patients with an alternative supplier;
 - Retention of GOS(S)3 and GOS(S)4 optical voucher forms.

COVID-19 – Scotland’s Strategic Framework

1. The Scottish Government’s [COVID-19 Strategic Framework](#), which sets out a new five-level system of COVID-19 protection measures that can be applied nationally or locally depending on prevalence of the virus across Scotland, comes into effect across Scotland on Monday 2 November 2020.
2. Practitioners and all practice staff are reminded to scrupulously follow the advice set out in the NHS Education for Scotland document, [‘Resuming General Ophthalmic Services Following COVID-19 Shutdown’](#). This is a live document and should be referred to on a regular basis.
3. As health care providers and essential businesses with safe and appropriate Infection Prevention and Control measures already in place, community optometry practices are exempt from the protection measures under all five levels and can therefore remain open and provide a full range of services. Emergency and essential care should continue to be prioritised over more routine services; those patients who are at greatest risk of detriment to sight or wellbeing should be seen first.
4. As set out on page 26 of the Framework document, the Scottish Government plans to extend routine COVID-19 testing to groups of health and care staff who visit care homes delivering close contact personal care to residents. Further

information on implications for community eye care professionals visiting care homes will be provided in due course.

Supply and usage of NHS Scotland PPE

Supply Solution

4. Due to the severity of the COVID-19 pandemic, and the demand it has placed on resources, the Scottish Government has agreed to provide PPE to primary care settings free of charge until at least the end of the 2020/21 financial year, where the activity being undertaken relates to the provision of NHS services.
5. Community optometry practices are therefore required to source and use their own PPE for any private activity undertaken, including private eye examinations and the dispensing of spectacles or contact lenses.
6. At the present time, a “push” model is in place where practices are allocated a pre-defined pack size based on pre-COVID activity levels, and this is distributed via local NHS Boards. NHS National Services (NSS) National Procurement are exploring options to deliver a “pull” model for future supply whereby practices are able to order the levels of equipment that best fit their model of practice. Further information in relation to this will be available in due course.

Principles applicable to community optometry

7. All contractors receiving free NHS-issued PPE must adhere to the following principles:
 - NHS primary care contractors have a duty to use NHS resources responsibly.
 - At all times they must use NHS-issued PPE professionally.
 - PPE is supplied, free of cost to contractors, on the basis that it is used by practice staff who are treating NHS patients. NHS-supplied PPE is not intended for issuing to patients or for sharing with elements of the business which are exclusively private practice and must never be forwarded to third parties or sold.
 - There is an expectation that the contractor will only request what is needed due to this being publicly funded and there being a high demand for PPE across all sectors.
 - A push model is currently in place and will continue to help manage demand in conjunction with the Boards. Should this over time move to a pull model, there is an expectation a reasonable amount of PPE would be ordered at any one time, around 3-4 weeks' worth.

- PPE must be used in line with the Public Health Scotland guidance for the sector, and contractors will be provided PPE which is compliant with guidance.
- All used PPE must be disposed of in line with guidance.
- NHS Boards will consider on a case by case basis any exceptions to allocation.
- Products may change as National Procurement buy from different sources. All products are assessed to ensure they are “clinically fit for purpose”. This would be based on review of paperwork and potentially samples.
- Specific products cannot be requested. There is a standard complaints process with NSS should there be any concerns with PPE supplied. The complaints process can be accessed via this link: <https://www.nhsscotlandprocurement.scot.nhs.uk/contacts/complaints.aspx>
- Some distribution will remain the responsibility of the local Health Board.
- Once delivered, stock remains the property of National Procurement.

Monitoring

8. PPE supply will be monitored to ensure appropriate use, and where there are variances relating to very high or very low usage this will be discussed with the relevant NHS Board and contractors.

Practice closures

9. As detailed within the principles, once delivered to a practice PPE stock remains the property of National Procurement. In instances where a practice closes, the relevant NHS Board should make contact with the practice to agree the means by which unused PPE will be returned.

Review

10. A formal review of the supply solution is proposed before 31 January 2021, in order to discuss arrangements for the 2021/22 financial year.

GOS(S)1 ‘cheque book’ forms

11. With regard to paragraph 43 of [PCA\(O\)2020\(11\)](#), and following clarification from NHS Counter Fraud Services, with immediate effect GOS(S)1 ‘cheque book’ slips do not need to be completed whilst the current suspension of patient and patient representative signatures remains in effect due to the COVID-19 pandemic; this applies to ***both face-to-face and remote consultations***. Any GOS(S)1 ‘cheque book’ slips that practices have retained for eye examinations undertaken after 20

March 2020 (when the suspension of signatures was first announced in [PCA\(O\)2020\(4\)](#)) can therefore be discarded.

12. In line with the [College of Optometrists guidance](#) regarding patient records, practitioners must ensure that the patient's record is appropriately annotated with the date that the eye examination was undertaken. It is also recommended that the nature of the consultation is recorded i.e. face-to-face or remote.

Issuing a written prescription or statement following an eye examination

13. Practitioners are reminded that there is provision in Schedule 1, paragraph 14 of [The National Health Service \(General Ophthalmic Services\) \(Scotland\) Regulations 2006](#), that requires a patient to be given a statement of the outcome of an eye examination.
14. The contractor should provide the prescription or statement immediately after the eye examination, and this should be provided in writing.
15. In order to protect the safety of patients and staff whilst fulfilling this requirement, it is recommended that the prescription or statement is provided to the patient prior to them leaving the test room.

The issue of GOS(S)3 forms for use by patients with an alternative supplier

16. In line with regulation 9(1) of the [National Health Services \(Optical Charges and Payments\)\(Scotland\) Regulations 1998](#), an optometrist or ophthalmic medical practitioner is required to issue to an eligible person a voucher relating to the optical appliance prescribed during an eye examination.
17. Notwithstanding the guidance currently in place in relation to the suspension of patient signatures, patients are still entitled to exercise choice in relation to where they use vouchers in relation to the dispensing of optical appliances i.e. an alternative optometry practice or a dispensing-only supplier.
18. In order to protect the safety of patients and staff, it is recommended that in instances where an eligible patient wishes to use their GOS(S)3 voucher with an alternative supplier, it is provided prior to them leaving the test room.

Retention of GOS(S)3 and GOS(S)4 optical voucher forms

19. Practitioners are advised that the relevant paper form does not need to be retained in respect of a GOS(S)3 or GOS(S)4 optical voucher payment claim via eOphthalmic, whilst the current suspension of patient and patient representative signatures remains in effect due to the COVID-19 pandemic.

Enquiries

20. Any queries about this Memorandum should be emailed to the Scottish Government at: eyecare@gov.scot.

Dentistry and Optometry Division
Directorate of Primary Care
Scottish Government