

## Response ID ANON-QRUY-NMKK-2

Submitted to **Prohibiting smoking outside hospital buildings: Consultation**

Submitted on 2020-01-07 17:58:33

### Ministerial Foreword

#### Section 1 - No-smoking area

**1 Do you support the proposal that the distance from hospital buildings which will form the perimeter of the no-smoking areas outside a hospital building should be 15 metres?**

Yes

**If you have any comments on the perimeter distance please record those here.:**

The College agrees with this distance with the proviso that this should be monitored and evaluated and, if necessary, increased in the future to ensure the success of these measures.

We recognise difficulties in policing this restriction. There may be difficult enforcing the exact distance from the hospital premises. Some individuals may consider that they are the freely able to smoke in areas outside the 15 metre zone.

We would not wish to see Hospital staff for instance smoking outside the 15 metre zone thinking they were safe from prosecution.

**2 Do you support the proposal that the perimeter should be measured from the outside wall of a building and include all land or area under any canopy or overhang even where those extend beyond 15 metres?**

Yes

**If you have any comments on how and from where the perimeter distance should be measured please record those here.:**

The College agrees with the proposals to ensure a 15m distance beyond any canopy or overhang

#### Section 2- No-smoking notices

**3 Do you support the proposal to set the wording and dimensions of no smoking notices as described above?**

Yes

**If you have any comments on the proposed wording and dimensions please record those here.:**

We agree with the dimensions. We propose one change to the wording: insert after "a member of staff" the following text ", Freephone number ... , or [insert email address]".

#### Section 3 – Exceptions

**4 Do you support the proposal that no specific hospital or type of hospital should be exempted under the definition of “hospital” in the Act?**

Yes

**If you have any comments on this exception please record those here.:**

No further comments

**5 Do you support the proposal that no-smoking areas will only apply to buildings used wholly or partly as a hospital?**

No

**If you have any comments on this exception please record those here.:**

We consider that all buildings on a hospital site should be considered the same. The reason for this is to ensure a consistency of approach to all healthrelated buildings. This consistency is important for patients, staff, the public, and health service management.

**6 Do you support the proposal that public footpaths, cycle paths and footways should be considered hospital grounds for the purposes of establishing no-smoking areas outside the doorways of hospital buildings, and that the size of the grounds would extend up to 15 metres from the centre of doorways.**

Yes

**If you have any comments on this please record those here.:**

This seems proportionate and appropriate and we have no further comment.

## Section 4 - Nicotine Vapour Products on hospital grounds

**7 Do you support the proposal that the use of NVPs should be allowed as an alternative to smoking on hospital grounds but not within the no-smoking area outside hospital buildings?**

No

**If you have any comments on the proposal please record these here. :**

While the use of NVPs is supported as part a programme to reduce and cease smoking, there is no evidence that use of NVPs alone and not part of such a programme is safe. There are reports from the united States and the UK of significant lung disease associated with the use of NVPs. While this has not reached the stage of a proven case, we do not consider it appropriate to recommend use of these agents allowing exposure to the general public when their safety is unproven

We would emphasise that all current communications state that neither smoking nor use of NVPs are allowed within the no-smoking areas. Hence there is a consistency of messages and bcause there are good reasons for not allowing NVPs in hospitals e.g. safety issues, even if they are less harmful than smoking.

## Section 5 – Equalities

**8 Do you consider there to be any positive or negative impacts on equality as a result of the proposals in this consultation.**

Yes

**If you have comments on any potential impact on equalities please record these here together with evidence and advice on mitigating actions. :**

There are potentially negative impacts on some people with disability being able to get beyond the no-smoking area but hospitals already deal with this issue.

## About you

**What is your name?**

**Name:**

Dr Richard Hull, Honorary Secretary

**What is your email address?**

**Email:**

Steven.shanahan@rcpsg.ac.uk

**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

Royal College of Physicians and Surgeons of Glasgow

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (without name)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

## Evaluation

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Very satisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Slightly satisfied

**Please enter comments here.:**

It is not easy for an organisation which gather information from various sources to complete it easily