

REPORT TO: Health and Wellbeing Board
DATE: 17 September 2014
REPORTING OFFICER: Director of Public Health.
PORTFOLIO: Health and Wellbeing
SUBJECT: Pharmaceutical Needs Assessment
WARD(S) Borough-wide

1.0 PURPOSE OF THE REPORT

1.1 To provide members of the Board with a draft Pharmaceutical Needs Assessment (PNA) and briefing on the statutory 60-day consultation process.

2.0 RECOMMENDATION: That

- 1. the Board approve the draft PNA, including the findings detailed in it; and**
- 2. the Board approve the commencement of the 60-day statutory consultation in line with the process detailed in this report.**

3.0 SUPPORTING INFORMATION

3.1 The pharmaceutical needs assessment is a statutory document that states the pharmacy needs of the local population. This includes dispensing services as well as public health and other services that pharmacies may provide. It is used as the framework for making decisions when granting new contracts and approving changes to existing contracts as well as for commissioning pharmacy services. First detailed in the NHS Act 2006 where PCTs were divested with the responsibility for producing the PNA, since 1 April 2013 this responsibility now sits with Health & Wellbeing Boards (HWB).

3.2 Background to the PNA

National guidance states that the PNA should detail the current pharmaceutical service provision available in the area and where there may need to be changes to this in the future because of changes to the health needs or geographical location of the local population. The guidance, in line with regulations, includes both minimum content of a PNA and the process that must be followed.

At the 17 July 2013 HWB meeting, the Board authorised the

establishment of a local steering group to oversee the development of its first PNA.

In agreement with NHS England, a common framework had been developed (led by Public Health, Halton Borough Council) for PNAs across Merseyside. This is in line with Regulation 4 and Schedule 1 of the 2013 Regulations outlining the minimum requirements for PNAs. Work has been underway since the steering group was established to populate this template.

The PNA is split into sections which outline:

- The scope and methodology of the PNA including consultations
- The national Pharmaceutical Services Contract
- an overview of current providers of pharmaceutical services
- Pharmacy Premises, their locations and opening hours, access and prescribing, including cross-border provision
- Population and Health Profile
- Pharmacy activity against a range of local priorities

The PNA is designed to be a statement of fact, both the current position and where there are 'known firm plans' in place to review or amend provision based on need, evidence of effective practice and identified gaps in provision. Also to assess where there are 'known firm plans' for new developments or population changes which may impact on the needs of pharmaceutical services. It is designed to assess the need for pharmaceutical services and adequacy of provision of pharmaceutical services, not to assess general health needs. The latter is the role of the Joint Strategic Needs Assessment (JSNA) . Preparation of the PNA has taken account of the needs identified in the JSNA, where they are relevant to pharmaceutical services.

3.3 Developing the draft PNA

The steering group was established following the HWB authorisation in July 2013. It has met at regular intervals since then, taking into account the need to progress certain elements of the PNA as well as keep members informed of progress. The steering group is chaired by a Consultant in Public Health and consists of representatives from:

- Local Authority Public Health team,
- NHS England area team,
- Clinical Commissioning Group,
- Local pharmaceutical committee (LPC),
- Healthwatch,
- Halton & St Helens Council for Voluntary Services
- an elected representative from the HWB.

This group has overseen and supported the development of the

PNA. A Task & Finish group has also met in between steering group meetings to ensure tasks identified by the steering group are being progressed and to troubleshoot any difficulties in a timely fashion.

3.4 Pharmacy and Public Surveys

In addition to the statutory 60-day consultation (detailed below item 3.5), the steering group carried out a questionnaire to all pharmacies to gather up-to-date information on the services they provide. It also conducted a public survey to gain local people's views on their local pharmacy. Nearly 100 local people responded to this survey during a 4 week period. The information obtained from both the pharmacy and public surveys have been used to populate and inform the PNA.

3.5 Findings of the PNA

The PNA includes a series of statements outlining adequacy of provision. These are shown as key findings in the executive summary. They are duplicated at the beginning of the main document and at the end of each relevant section (as boxed conclusions). Summarised below, overall there is adequate provision to pharmacies and the majority of services they provide:

- Access to pharmacies is considered to be adequate across the borough, in both Widnes and Runcorn.
- There is variation in population-to-pharmacy ratios and this needs to be carefully monitored to determine the impact any closures may have
- There is a great deal of public satisfaction with pharmacy services, although the main comments received related to opening hours, especially lunch-time closures and evening ie post-6pm access.
- There is adequate provision of smoking cessation services
- There are currently no services in pharmacies to reduce alcohol consumption and limited evidence of effectiveness. This will be kept under review.
- There is adequate access to Medicines Use Reviews
- There are opportunities to use signposting and the 6 health promotion campaigns (part of the essential services national contract) to increase public awareness of the early signs of depression, cancer prevention and screening and the management of long-term conditions.
- Access to Care at the Chemist is partially adequate the CCG is already reviewing this service.
- There is adequate provision of Emergency Hormonal Contraception
- There is adequate provision of substance misuse services, both Needle & Syringe Exchange and supervised

- consumption
- There is adequate provision of palliative care services. However this service is being reviewed and this assessment may change as a result of this.

3.6 **Statutory 60-day consultation**

The Regulations set out that:

- HWBs must consult the bodies set out in Regulation 8 at least once during the process of developing the PNA. Any neighbouring HWBs who are consulted should ensure any LRC in the area which is different from the LRC for the original HWB's area is consulted;
- there is a minimum period of 60 days for consultation responses; and
- those being consulted can be directed to a website address containing the draft PNA but can, if they request, be sent an electronic or hard copy version.

Regulation 8(1) states that the HWB must consult the following list as a minimum during the development of the PNA

- (a) Local Pharmaceutical Committee(s) for its area;
- (b) Local Medical Committee(s) for its area;
- (c) all pharmacy contractors and any dispensing doctors for its area;
- (d) any LPS chemist in its area with whom the NHS England has made arrangements for the provision of any local pharmaceutical services;
- (e) Local Healthwatch organisation for its area, and any other patient, consumer or community group in its area which in the opinion of HWB has an interest in the provision of pharmaceutical services in its area;
- (f) NHS trusts or NHS foundation trusts in its area;
- (g) NHS England
- (h) neighbouring HWB.

3.7 **Proposed arrangements for the 60-day consultation**

A standard letter has been developed to invite all consultees to consider the draft PNA and inform them of the opening of the 60-day consultation period. A set of questions has also been developed to assist those wishing to respond. It also gives each individual pharmacy contractor the opportunity to check the opening times and services the PNA lists for them and make any amendments.

It is proposed that the letter will be sent out electronically following the HWB decision that the draft can be issued for consultation. The PNA together with the survey will be available on Halton Borough Council's website with the weblink included in the letter. The survey will also be sent out with the letter for those who wish to work off a

separate document or send a paper response in. The letter includes the closing date for the consultation and all responses must be with Halton Borough Council by the end of this date.

3.8 Resources

The Halton Borough Council Customer Intelligence team ran the public survey on behalf of the steering group. It has been agreed that they will also set up the 60-day consultation survey and supply the steering group with all results following the closing date. The consultation will therefore be conducted electronically to minimise costs and the impact on the environment. The letter includes details of how people can obtain a paper copy of the PNA and the timeframe within which this will be provided to them (within 14 days maximum).

The steering group will meet shortly after the closure of the 60-day consultation period to consider the responses and any amends to the PNA as a result of them. It will analyse the results and develop a set of responses to each 'free-text' comment made. These will be included in the final PNA.

3.9 Proposed next steps

- Board note the findings of the PNA
- Board approve the draft PNA for consultation
- PNA and survey is made available on Halton Borough Council website
- 60-day consultation letter is sent to all consultees electronically
- Queries and requests for paper copies of the PNA are managed by the Public health team
- Customer Intelligence Unit sends all responses to the PNA steering group once the consultation period closes
- The steering group prepares a set of responses and makes the necessary amends to the draft PNA (liaising with relevant commissioners/organisations are necessary)
- The steering group submits the final PNA to the January 2015 HWB meeting.

4.0 POLICY IMPLICATIONS

4.1 The health needs identified in the JSNA have been used to develop the PNA.

The PNA provides a robust and detailed assessment of the need for pharmaceutical services across Halton borough. As such it should continue to be used in the decisions around 'market entry' as well as local commissioning decisions of both Halton Clinical Commissioning Group and Halton Borough Council Public Health. Local groups and partnerships should also take the findings of the

PNA into account when making decisions around the need for pharmaceutical services.

5.0 OTHER/FINANCIAL IMPLICATIONS

- 5.1 Any legal challenges to decisions based on information in the PNA may open the HWB up to Judicial Review. This can have significant financial implications. It is therefore vital that the HWB continues to follow national guidance in the implementation of the Regulations.

6.0 IMPLICATIONS FOR THE COUNCIL'S PRIORITIES

6.1 Children & Young People in Halton

Improving the Health of Children and Young People is a key priority in Halton and this should be reflected in the PNA, detailing service provision that is appropriate to this age group.

6.2 Employment, Learning & Skills in Halton

Not applicable

6.3 A Healthy Halton

All issues outlined in this report focus directly on this priority.

A Safer Halton

Not applicable

6.4

6.5 Halton's Urban Renewal

The environment in which we live and the physical infrastructure of our communities has a direct impact on our health and wellbeing. Pharmacies provide a vital primary health care service to residents across the borough, are located within the heart of communities and offer open access to trained health professionals for advice on a wide range of issues.

7.0 RISK ANALYSIS

- 7.1 Failure to comply with the regulatory duties fully may lead to a legal challenge, for example, where a party believes that they have been disadvantaged following the refusal by NHS England over their application to open new premises based on information contained in the PNA.
- 7.2 The risk of challenge to the HWB who produced that PNA is significant and Boards should add the PNA to the risk register.
- 7.3 A sound process, using national guidance and with support from local expertise, should be established to ensure this risk does not materialise.

8.0 EQUALITY AND DIVERSITY ISSUES

8.1 The PNA seeks to provide intelligence on which to base decisions about service provision that are based on levels of need across the borough. This includes analysis of a range of vulnerable groups and the need for targeted as well as universal services to meet the range of needs identified.

9.0 LIST OF BACKGROUND PAPERS UNDER SECTION 100D OF THE LOCAL GOVERNMENT ACT 1972

None within the meaning of the Act.

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