

REPORT TO: Health and Wellbeing Board
DATE: 10 July 2024
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 briefing on the Pharmaceutical Needs Assessment (PNA), including risks associated with it and proposed local governance.

2.0 RECOMMENDATION:

- i) **The Health & Wellbeing Board is asked to note and agree that the lead is the Director of Public of Health and;**
- ii) **That the management of the PNA will be through the established local steering group led by public health.**

3.0 SUPPORTING INFORMATION

3.1 The pharmaceutical needs assessment (PNA) is a statutory document that states the needs for pharmaceutical services within the local population. This includes dispensing services as well as public health and other services that pharmacies may be commissioned to 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. The NHS Act in 2006 originally set out the responsibilities for producing a PNA. The legislation was then amended in 2013 transferring responsibilities from Primary Care Trusts to Health and Wellbeing Boards.

3.2 Background to the PNA

A PNA details the current pharmaceutical service provision available in the area including potential need for changes to this in the future because of changes to the health needs or geographical location of the local population. It covers a 3-year period. Any changes to community pharmacy provision within the lifetime of the PNA can be detailed in supplementary statements to keep the document up-to-date.

The next PNA must be published by 1 October 2025. The regulations stipulate both minimum content and process. To conform to the regulations means that the PNA typically takes approximately a year to develop.

The PNA enables all commissioners of community pharmacy services to make sure that any new contracts granted and pharmaceutical services commissioned are based on the information provided in the document.

Anyone wishing to open a new pharmacy in the area needs to include in their application their plans to meet the needs of local people as identified in the PNA.

The next PNA will be Halton's fifth document. The steering group has recently been re-established to oversee the next version of the PNA, chaired by a Consultant & Deputy Director Public Health.

3.3 Changes effective since 1 April 2013

From April 1st 2013 health and wellbeing boards (HWBBs) have had a statutory responsibility to publish and keep up to date the PNA. Health & Wellbeing Boards are also responsible for producing the Joint Strategic Needs Assessment (JSNA). The PNA is linked to the JSNA but must be a separate process and document.

The NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013, effective from 1 April 2013, stipulate both the process for developing the PNA and minimum content. This includes a statutory 60 day consultation period.

On 1 April 2023 the responsibility for making decisions on pharmacy applications based on the PNA passed from NHS England to Integrated Care Boards.

3.4 Commissioning arrangements

The Integrated Care Board (ICB) is mandated under these same regulations to use the PNA when making decisions on applications to open new pharmacies and dispensing appliance contractor premises.

Public health teams and ICB Place commissioners can also use the PNA to inform their commissioning decisions on locally-commissioned services from community pharmacies. Robust, up-to-date information is important to ensure that community pharmacy services are provided in the right place and meet the needs of the communities they serve.

3.5 Proposed arrangements for producing Halton's next PNA

A Cheshire and Merseyside group of local authority PNA leads, the Cheshire & Merseyside ICB pharmacy contracts lead and representatives from the Local Pharmaceutical Committees have met to agree the common elements of the PNA, both content and information gathering exercises. This will avoid duplication of effort and enable easy sharing of information, especially in relation to the requirement to consider cross-border provision as part of the PNA.

The Cheshire & Merseyside group proposed to use the current Halton PNA document framework to produce the next PNAs, with some minor amends to streamline content and reflect changes to the commissioning landscape. This will ensure that although each HWBB PNA will be developed locally and differ according to the local area and population needs, each local authority area will follow the same template which will make it easier to use and review. The amends have been checked against the regulations and with these key stakeholders to ensure the PNA remains fit for purpose.

The Health & Wellbeing Board is asked to note that the lead is the Director of Public of Health and that a steering group has been established led by public health.

The steering group will oversee the operational development of the PNA including a statutory (minimum) 60-day consultation on a final draft document.

The findings of the consultation will inform the final report. The steering group will circulate the draft report to the HWBB before the PNA is published. This is in line with the regulations.

It is important to ensure that all information within the PNA is accurate and up to date, and this can be achieved by ensuring that all relevant stakeholders are represented on the steering group. The membership includes representatives from:

- Halton Borough Council's Public Health Team,
- ICB pharmacy contracts team,
- Sub-ICB Place commissioning and medicines management
- Local pharmaceutical committee (LPC),
- representation from the local community (Halton & St Helens CVA),
- Healthwatch,
- an elected representative from the Health & Wellbeing Board.

Following the consultation period we are required to provide a response to each point that is fed back through the consultation process, making any necessary amends to the PNA document.

The PNA must be published by 1 October 2025 at the latest on a publically accessible website. The Joint Strategic Needs Assessment (JSNA) is published on Halton Borough Council website so the PNA will be made available alongside the JSNA.

3.6 Resources

This is a large piece of work which will extend over a considerable period of time. Typically to write the document and undergo the 60-day statutory consultation PNAs have taken 12-15 months to complete. As well as information gathering from the organisations who commission services from pharmacies as to current and future needs, there needs to be extensive work done by public health team to oversee the document development including describing the local population and health needs as well as mapping provision of pharmaceutical services. Work also needs to be done looking at future changes that could impact upon pharmaceutical need. These could include major housing development plans due to be delivered during the lifetime of the PNA, closure of a local industry and planned or predicted changes to local health or healthcare. The local population will also be consulted as to their views on current provision of pharmaceutical services and aspirations for future pharmaceutical services.

3.7 Proposed next steps

Steering group to:

- Start to populate the PNA with information already available such as JSNA
- Start to gather information about community pharmacy providers to update the current PNA
- Ask the local community for feedback on current pharmacy services and aspirations for future pharmacy services
- Speak to local authority planners and healthcare commissioners to determine future planning of housing, industry and healthcare.
- Produce a final draft document
- Undertake a 60-day statutory consultation.
- Inform the HWBB of the results of the consultation and share the final document with the Board before publication by 1 October 2025

4.0 POLICY IMPLICATIONS

- 4.1 The health needs identified in the JSNA will inform development of the PNA.
- 4.2 The JSNA provides a robust and detailed assessment of need and priorities across Halton borough. As such is should continue to be

used in the development of other policies, strategies and commissioning plans.

5.0 FINANCIAL IMPLICATIONS

5.1 Any legal challenges to decisions based on information in the PNA may open the Health & Wellbeing Board up to Judicial Review. This can have significant financial implications.

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

None identified.

6.3 A Healthy Halton

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

6.4 A Safer Halton

None identified.

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 the ICB over their application to open new premises based on information contained in the PNA.

7.2 As such the PNA will be noted on the HBC corporate risk register through public health. The robust development process, including the use of national guidance, involvement of local expertise throughout and statutory consultation, that has been detailed above will mitigate against this risk.

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 CLIMATE CHANGE IMPLICATIONS

9.1 The production of the PNA does not in itself have any direct implications for climate change. Provision of pharmacy services described in the PNA and its assessment against need may help contribute to a reduction in carbon emission through reducing the need to seek further healthcare services.

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

None under the meaning of the Act.