



Agenda item

Meeting	Middlesbrough Health and Wellbeing Board
Date	14 March 2018
Title	Pharmaceutical Needs Assessment (PNA) - request for Health and Wellbeing Board (HWB) approval for publication
Responsible Officer	
Purpose of Item	This report presents the responses to the statutory 60-day consultation and the final version of the PNA for HWB approval for publication by 25 March 2018.
Summary of Recommendations	
<p>That Middlesbrough Health and Wellbeing Board:</p> <ol style="list-style-type: none"> 1. Receives the final report and a summary of the 60-day statutory consultation findings 2. Approves for the Director of Public Health to proceed to publish the PNA by 25 March 2018 	

PURPOSE OF THE REPORT

1. This report presents the responses to the statutory 60-day PNA consultation and the final version of the PNA for HWB approval for publication by 25 March 2018

Background

2. The Health and Well Being (HWBB) Board has a statutory responsibility to develop and update the PNA and responsibility for this process is delegated to the Director of Public Health. The PNA includes a description of all the pharmaceutical services currently available from local community pharmacies, and other providers, and identifies any potential for gaps and improvement or better access currently and in the future.
3. Since 2013, the PNA has used by NHS England in their decision-making when determining market entry to the pharmaceutical list and to amend conditions of being included in the list (such as location of pharmacy premises and opening hours).
4. In December 2017 the board approved the Director of Public Health to proceed to statutory 60-day consultation on the draft PNA following review of a summary of the process of the revision of the PNA, key areas for considerations, a summary of the current pharmacy contractor provision and a summary of the draft statement of need for pharmaceutical services.
5. Preparation of the second Middlesbrough HWB PNA for publication on or before 25 March 2018 is now complete. The PNA has been produced in accordance with the NHS (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013 and alongside the corresponding PNA for Redcar and Cleveland.

Statutory 60-day consultation

6. The 60-day formal public consultation included the following statutory consultees:
 - (a) Local Pharmaceutical Committee
 - (b) Local Medical Committee
 - (c) any persons on the pharmaceutical lists (i.e. pharmacy contractor) and any dispensing doctors list for its area;
 - (e) Healthwatch
 - (f) any NHS trust or NHS foundation trust in its area;
 - (g) NHS England; and
 - (h) any neighbouring HWB
7. And also included South Tees CCG, North of England Commissioning support (NECs) and the Pharmacy LPN (Local Professional Network)
8. Responses received from:
 - 1) NHS England
 - 2) LPC
 - 3) CCG
 - 4) North Yorkshire HWB
 - 5) Redcar and Cleveland HWB
 - 6) 2 x individual pharmacists

- 7) patient/member of public
- 8) Healthwatch
9. Responses generated valuable insight regarding current and future provision of pharmaceutical services. There were 9 responses to the consultation. A copy of the HWB response to the formal consultation is included in the final draft of the PNA. It is also provided here as Appendix 1 (NB Appendix 3 is its position in the PNA document)
10. Changes have been made to the PNA document to account for updates following consultation and some typographical errors since the draft document was published for consultation on 4 January 2018. The final PNA remains substantially unchanged following review of the responses to consultation; where changes have been made this is referenced in Appendix 1.

It is recommended that the H&WBB:

1. Approves for the Director of Public Health to proceed to publish the PNA by 25 March 2018

Report prepared by: Edward Kunonga, Director of Public Health

Appendix 1

Middlesbrough HWB Pharmaceutical Needs Assessment

Formal Consultation 4th January to 6th March 2018 Summary and Feedback

Total responses received = 9

7 via the electronic consultation response form

2 via direct email or letter

Responses from those two organisations that did not use the electronic response form to reply (NHS England and Healthwatch) are shown at the end of this summary of the collated responses received to the specific consultation questions.

Comments received are quoted verbatim. ID (number) refers to an individual response. Response to comments on behalf of Middlesbrough HWB are shown in italics. Where a consultation comment was considered to raise a query or require reflection on the content of the draft PNA, the response has included action taken to address this, or reasons why no amendment has been made

1. Do you think that the purpose of a PNA has been explained?

Yes – 7

No – 0

Not sure – 0

2. Do you think that the draft PNA describes the range of pharmaceutical services available in the Borough?

Yes – 7

No – 0

Not sure – 0

3. Do you think that the draft PNA reflects local pharmaceutical needs?

Yes – 6

No – 1

Not sure – 0

Comment:

Coulby Newham appears to have a constant requirement for additional assistance (more help to reflect increased users), perhaps integrating neighbouring services will provide improved customer satisfaction.

HWB response: this feedback is acknowledged. Coulby Newham has three pharmacies, and two of the three pharmacies provide late night opening and/or 7 day week opening. There are also neighbouring pharmacies in Hemlington and Marton

4. Are you aware of any pharmaceutical services provided in the Borough that are not currently included in the draft PNA?

Yes – 0
No – 7
Not sure – 0

5. Is there any other information which you think should be included in the draft PNA?

Yes – 0
No – 7
Not sure – 0

6. Do you think that the process followed in developing the PNA was appropriate?

Yes – 7
No – 0
Not sure – 0

7. Do you think there is any CURRENT need for pharmaceutical services that has not been identified by the Health & Wellbeing Board in the Borough?

Yes – 0
No – 7
Not sure – 0

8. Do you think there is any FUTURE need for pharmaceutical services (within the next 3 years) that has not been identified by the Health & Wellbeing Board in the borough?

Yes – 1
No – 5
Not sure – 1

Comments:

ID6 - HIV point of care testing. Greater opportunity for screening, accessibility in long-term conditions

HWB response: This comment is acknowledged and amendment made to 11.6.13 in the PNA final document

9. Do you have any other comments regarding the draft Middlesbrough HWB PNA?

Yes – 5
No – 2
Not sure – 0

Comments:

ID2 - We acknowledge that a thorough process has been followed in liaising with, and seeking feedback from, the public, relevant parties and organisations during the production of the PNA and we confirm that we believe it meets the requirements as set out in the regulations. Access to pharmacies by residents in the north of North Yorkshire County is

likely improved by pharmacies located to in south Middlesbrough. A reduction of pharmacies or opening hours in this area could adversely affect North Yorkshire residents so we are pleased to read there are no plans to do this.

HWB response: This comment is acknowledged

ID4 - Very comprehensive piece of work

HWB response: This comment is acknowledged

ID5 - The management of minor conditions in the CCG area must be considered in the context of access to a GP practice or other primary care service. The lack of timely access to general practice is commonly reported as being of significant issue amongst the people who live here. It is not possible to ignore the extent of deprivation/ low health literacy/ capability to self care in an area so distinct from the english average in this way. The national driver towards removing access to 'common' medicines on prescription is understandable, but all the more reason to find a facility to properly support and redirect those who may still need access to these medicines. This may be different in more affluent parts of the country, but here, driving people to the cheapest (off prescription) source, without access to proper advice and without it being recorded in their medical records may prove to be more costly in the longer term.

HWB response: Thank you for this comment. Reference to this comment and also to the recent national consultation with regard to taking certain medicines off prescription will be referenced in the final PNA document in Section 10.2

ID6 - The HLP status is not determined by stop smoking qualifications, this is incorrectly stated within the document under 8.2.4, there is a requirement for leadership training for HLP status, however.

HWB response: This reference to smoking has been removed from the PNA final document

ID6 - Flu vaccine service is stated both within advanced and enhanced services which is incorrect.

HWB response: This will be reviewed in the final document and reference to advanced service only will be ensured

ID6 - The chlamydia screening postal kits are not paid based on return rate, they are a consultation fee for all kits distributed.

HWB response: This has been amended in the final document and will now read - Pharmacies are paid for each chlamydia kit that is distributed from their pharmacy; identified through their uploading of distribution details onto PharmOutcomes.

ID6 - C Card is mentioned but not included in the detail.

HWB response: Thank you for highlighting this omission. The following information has now been added to section 8.3.4.8 - Seventeen pharmacies are currently signed up to deliver the C Card programme (condom distribution for 13-24 year olds); the scheme comprises 2 elements – registration and condom distribution. In order to deliver the

scheme, pharmacy staff must undertake training that covers the key elements of the registration process - confidentiality, Fraser assessment guidelines, positive sexual health messages, condom demonstration, information about sexual health clinics, access to emergency contraception, STI in particular chlamydia. Once this is completed, pharmacies can then market their participation in the scheme.

The registration process consists of an assessment that covers the above points (including a Fraser Assessment for all <16's); details of the registration are uploaded onto PharmOutcomes (this upload in turn generates the sexual health services monthly activity submission). The young person is then given a card which has a reference number comprising the pharmacy F reference/ODS code. The young person is also given condoms (up to 3 for <16's, 12 for 16+). The card allows the young person to then attend/receive condoms on 10 occasions; on the 10th occasion the dispensing pharmacy should advise the young person to undertake a full sexual health screen before re-registering for a new card. On each dispensation, the pharmacy is also required to upload this information to PharmOutcomes.

ID-7 The HWB recognise that the population of Redcar and Cleveland may travel outside of the HWB area for pharmaceutical services into Middlesbrough. Examples of how this might arise include:

- persons may travel in connection with their occupation, or place of work
- nearest pharmacy for very few residents of some areas of Redcar and Cleveland is in actually in another HWB area
- non-pharmaceutical retail-driven movement (e.g. visiting a supermarket or out of town shopping facility)
- a need to access pharmacy services at times of the most limited service provision – for example late evenings, on Sundays or on Bank holidays (or equivalent) days
- choice to access pharmaceutical services elsewhere for any other reason which may include a distance-selling pharmacy

Transport links, proximity to existing pharmacies and service data where available, suggest that where users of pharmacy services do sometimes choose to travel out of Redcar and Cleveland to access a pharmacy in Middlesbrough, this would most commonly be to pharmacies located at:

- Ormesby in Middlesbrough
- The retail centre of Middlesbrough
- Supermarket and shopping area in Coulby Newham in Middlesbrough

The level of cross boundary activity is considered to most likely represent choice or convenience for the resident population of Redcar and Cleveland, or may also demonstrate some large scale dispensing contracts, for example, nursing home patients. However, in the current absence of any pharmaceutical provision within the boundary of Redcar and Cleveland HWB between 9pm and 9.30pm on a Sunday, the Middlesbrough pharmacy in Linthorpe open at this time provides a necessary service for patients accessing the GP extended hours hubs in Redcar and Cleveland and subsequently requiring access to pharmaceutical services.

Redcar & Cleveland HWB thank Middlesbrough HWB for the opportunity to respond to this consultation

HWB response: This comment is acknowledged

Other responses to consultation

NHS England (Cumbria and the North East)

Thank you for inviting NHS England to comment upon the Middlesbrough Pharmaceutical Needs Assessment and for the work undertaken in producing the draft PNA. It is noted that Middlesbrough HWB has concluded the following:

- That the Needs Assessment has identified necessary pharmaceutical services and the current provision thereof and found there to be no gaps in terms of numbers of pharmacy contractor or appliance contractor premises or outlets, and their general location, including the days on which and hours at which the services are provided. Pharmacy services are generally considered to be well located and very easy to access.
- The HWB considers that there is sufficient choice of both provider and services available to the resident and reliant population of both localities of Middlesbrough to meet current needs and likely future needs for these necessary pharmaceutical services
- There is no identified current or future need for new additional pharmacy contractors.
- For pharmaceutical needs to continue to be met, it is necessary to maintain the number of core hours provided before 9.00am and after 6.00pm on week days and all core hours on a Saturday and Sunday. The pharmacies that are open for 100 hours per week are necessary providers of core hours; they provide a substantial contribution to opening hours' stability and the HWB would not wish to see any of their total opening times reduced.
- Although there are no Dispensing Appliance Contractors in Middlesbrough, prescriptions for appliances are written for patients in this area and will need to be dispensed. The HWB considers there is no gap in the provision of such a pharmaceutical service and does not consider that an appliance contractor is required to be located in the Middlesbrough HWB area to meet the pharmaceutical needs of patients.

HWB response: All comments above are acknowledged

Further to NHS England's review, the points above are consistent with our findings.

HWB response: This comment is acknowledged

Thank you for sharing the document with us. We look forward to working closely with other commissioners of NHS services in Middlesbrough, to ensure that community pharmacies continue to play their part in delivering high quality services and advice to patients.

Healthwatch South Tees

Thank you for giving Healthwatch South Tees the opportunity to comment on the draft 'Middlesbrough Pharmaceutical Needs Assessment'

The first comment I would like to make is that the length of the document appears excessive with certain information being quoted several times throughout, my thoughts are that much of the supporting information could have been included in the appendices at the end of the document for readers to refer to if they wish.

HWB response: The document is long but based on the same format as the HWB 2015 document – going forwards and for the 2021 PNA we will review the options for streamlining the document to also explore the option to develop an interactive web based PNA document

The second thing I would like to raise is that 33 responses to the survey is low, especially considering the population size of Middlesbrough, if possible it would be helpful to ensure that all areas of Middlesbrough feed into the process to ensure no bias in the responses for certain areas.

HWB response: The PNA also acknowledges the low response rate. The HWB are committed to improving opportunities for patient and public involvement and will as part of the on-going maintenance of the PNA take opportunities for PPI to inform subsequent revisions of the PNA and will also explore the potential of carrying out PPI activity for pharmacy services in partnership with Healthwatch and other relevant organisations e.g. CCG and the Local Pharmaceutical Committee in the interim period to inform subsequent revisions of the PNA

Healthwatch South Tees have not been made aware of issues regarding the service provision of pharmacies within the area, and agree with the conclusion that Middlesbrough is reasonably provided with pharmaceutical services.

HWB response: This comment is acknowledged