

REPORT TO:	HEALTH AND WELLBEING BOARD 4 December 2013
AGENDA ITEM:	9
SUBJECT:	Pharmaceutical Needs Assessment
BOARD SPONSOR:	Dr Mike Robinson, Director of public health
CORPORATE PRIORITY/POLICY CONTEXT:	
<p>From 1 April 2013, Croydon's health and wellbeing board became responsible for Pharmaceutical Needs Assessment (PNA). The NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013, which came into force on 1 April 2013, require each health and wellbeing board to make a revised assessment as soon as is reasonably practicable after identifying changes to the need for pharmaceutical services which are of a significant extent; and publish its first PNA by 1 April 2015.</p>	

REVISED VERSION

1. RECOMMENDATIONS

The health and wellbeing board (the Board) is asked to:

- Agree to the publication of the current Pharmaceutical Needs Assessment, originally published by Croydon Primary Care Trust on 1 February 2011, at Appendix 1 to this report on the council website.
- For the reasons detailed in para. 3.6 agree that the three supplementary statements (PNA2011_3, 4 & 5) to this report be published alongside the current Pharmaceutical Needs Assessment on the council website.
- Approve two further supplementary statements (PNA2011_1 and PNA2011_2) setting out additional changes to local pharmaceutical services for the reasons set out at 3.7 below.

2. Executive Summary

- 2.1 This paper outlines the steps that need to be taken to ensure that the current pharmaceutical needs assessment (PNA) for Croydon is fit for purpose and ready for publication on the council website. It also seeks agreement to the publication of supplementary statements explaining changes to the availability of pharmaceutical services since the publication of the Croydon PCT's PNA.
- 2.2 The Board will be updated on progress with the production of a new PNA at its meeting on 26 March 2014.

3. Detail

- 3.1 From 1 April 2013, Croydon's health and wellbeing board became responsible for publishing a PNA. The NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 (the 2013 Regulations), which came into force on 1 April 2013, require each health and wellbeing board to make a revised assessment as soon as is reasonably practicable after identifying changes to the need for pharmaceutical services which are of a significant extent; and publish its first PNA by 1 April 2015.

- 3.2 The current PNA was produced by Croydon Primary Care Trust and published on 1 February 2011. NHS England (NHSE) has recently conducted an exercise which reviewed Croydon's PNA. The review took the form of RAG rating the document against Regulations 3-9 and Schedule 1 of the 2013 Regulations. On 24 July 2013, the Council's Director of Public Health was sent a letter from NHS England setting out results from the RAG rating exercise. It is considered that this does not indicate the necessity for an immediate revision of the statement, but has formed the basis for the action plan to ensure that the current PNA is fit for purpose and can be published on the council website.
- 3.3 It should be noted that the version of the PNA reviewed by NHSE appears to have been incomplete. Two sections were missing. This means that some of the actions recommended by NHSE do not need to be addressed: The missing sections were:
- Annex A – Map of community pharmacies and community pharmacy district list;
 - Annex B – PNA process and consultation.
- 3.4 Upon reviewing the RAG rating by NHSE, it was decided to update the PNA with:
- A map of Provision (PNA2011_3)
 - A map which relates to matters to consider when making an assessment demonstrating benefits of reasonable choice (PNA2011_4)
- 3.5 Regulations state that HWBs should publish a supplementary statement explaining changes to the availability of pharmaceutical services since the publication of its pharmaceutical needs assessment (and any such supplementary statement becomes part of that assessment), where –
- (a) the changes are relevant to the granting of applications referred to in 2013 Regulations
 - (b) The HWB –
 - (i) is satisfied that making a revised assessment would be a disproportionate response to those changes, or
 - (ii) is in course of making a revised assessment and is satisfied that immediate modification of its pharmaceutical needs assessment is essential in order to prevent significant detriment to the provision of pharmaceutical services in its area.
- 3.6 Therefore, both of the above maps need to be signed off by the HWB along with an overarching supplementary statement confirming that PNA has been updated in line with 'The 2013 Regulations' (PNA2011_5)
- 3.7 Two further supplementary statements (PNA2011_1 and PNA2011_2) setting out changes to local pharmaceutical services had not been agreed by Croydon PCT, which are also attached for the HWB to approve and be published on the council website alongside the current PNA.

4. CONSULTATION

- 4.1 The PNA consultation process and findings are set out in Annex B of the current PNA document.

5. SERVICE INTEGRATION

- 5.1 Pages 5 and 6 summarise key findings of the PNA for Core Dispensing Services and the care pathways. The PCT identified that the PNA recommendations affected care pathways in its Strategic Plan 2009/10 – 2014/15 for Staying Healthy, Children and Young People, Long term conditions, Mental Health and Learning Disabilities and Urgent Care.

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 There are no costs to the council for the publication of the PNA and supplementary statements on its website.
- 6.2 Approved by: Paul Heynes, head of finance – DASHH, corporate resources and customer services department on behalf of the director of finance

7. LEGAL CONSIDERATIONS

- 7.1 The Solicitor to the Council comments that under the 2013 Regulations, after the Council has published its first PNA, each HWB must publish a statement of its revised assessment within 3 years, the timetable for which is detailed in the body of the report.
- 7.2 A fully revised statement would only be necessary if the Council considered there had been changes, since the previous Croydon PCT assessment, which are of a significant extent, to the need for pharmaceutical services in its area, having regard in particular to changes to—
- a) the number of people in its area who require pharmaceutical services;
 - b) the demography of its area; and
 - c) the risks to the health or well-being of people in its area, unless it is satisfied that making a revised assessment would be a disproportionate response to those changes. As detailed in para.3.2 that is not considered necessary at this stage.
- 7.3 However, if the Board are satisfied that there have been changes to the availability of pharmaceutical services since the publication of Croydon PCT's PNA it may publish supplementary statements where—
- a) the changes are relevant to the granting of applications referred to in section 129(2)(c)(i) or (ii) of the 2006 Act; and
 - b) the Board —
 - i) is satisfied that making its first or a revised assessment would be a disproportionate response to those changes, or
 - ii) is in the course of making its first or a revised assessment and is satisfied that immediate modification of its pharmaceutical needs assessment is essential in order to prevent significant detriment to the provision of pharmaceutical services in its area.

As detailed in para.3.6 and 3.7 it is proposed to publish five supplementary statements in accordance with the Regulations.

- 7.4 Approved by: Gabriel MacGregor, Head of Corporate Law on behalf of the Council Solicitor & Monitoring Officer

8 HUMAN RESOURCES IMPACT

- 8.1 There are no immediate HR Implications that arise from the recommendations of this report for LBC staff
- 8.2 Approved by: Michael Pichamuthu, Strategic HRBP, on behalf of Heather Daley, Interim Director of Workforce.

9. EQUALITIES IMPACT

- 9.1 An equality impact assessment was not originally conducted as the PNA was developed before the Equalities Act 2010 Act was in force. The current PNA does already consider some of the protected characteristics under the Equalities Act 2010 but it will be important to ensure that when a new PNA is produced full consideration is given to how this meets the Council's public sector equalities duty.

10 ENVIRONMENTAL IMPACT

- 10.1 There are no environmental impacts arising from this report.

11 CRIME AND DISORDER REDUCTION IMPACT

- 11.1 This report has no crime and disorder impact.

CONTACT OFFICER:

Kate Woollcombe, Deputy Director of Public Health

APPENDICES

NHS Croydon Pharmaceutical Needs Assessment, February 2011

NHS Croydon Pharmaceutical Needs Assessment, February 2011 Annex A

NHS Croydon Pharmaceutical Needs Assessment, February 2011 Annex b

Supplementary statements

PNA2011_3 – PNA Review: Relates to Map of Provision

PNA2011_4 - PNA Review: Relates to matters to consider when making an assessment of demonstrating benefits of reasonable choice.

PNA2011_5 - PNA Review: Relates to information to be contained within the PNA

PNA2011_1 – Application by Capsaris Ltd to deliver new services in Fieldway Pharmacy

PNA2011_2 – Amendment to LPS Contract by VU Chem Ltd at Mayday Community Pharmacy

BACKGROUND DOCUMENTS:

None