

REPORT TO:	HEALTH AND WELLBEING BOARD (CROYDON) 25 March 2015
AGENDA ITEM:	12
SUBJECT:	Pharmaceutical Needs Assessment 2015 - 2018
BOARD SPONSOR:	Dr Mike Robinson, Director of Public Health
BOARD PRIORITY/POLICY CONTEXT:	
<ul style="list-style-type: none"> • The provision of NHS Pharmaceutical Services is a controlled market. Any pharmacist, or dispensing appliance contractor, who wishes to provide NHS Pharmaceutical Services, must apply to be on the Pharmaceutical List. The NHS England (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013 set out the system for market entry. • Under these Regulations, Health and Wellbeing Boards (HWBs) are responsible for publishing a Pharmaceutical Needs Assessment (PNA). • A PNA sets out a statement of the pharmaceutical services which are currently provided, together with when and where these are available to a given population. • The PNA is subsequently used by NHS England to consider applications to open a new pharmacy or to move an existing pharmacy and when commissioning services. It will also be a reference source for existing NHS pharmaceutical services contractors who may wish to change the services they provide and/or by potential new entrants to the market. • The HWB also has the duty to maintain the PNA, in response to changes in the availability of pharmaceutical services. This is either through revising the PNA or, where this is thought to be disproportionate, through the issue of a supplementary statement setting out the change(s). A map of provision must be kept up to date. • A new PNA must be published every 3 years. The HWB must make the PNA, and any supplementary statements, available to NHS England, neighbouring HWBs and the Public. • The HWB must also respond to consultations, by a neighbouring HWB, on a draft of their PNA. In doing so, the HWB must consult with the Local Pharmaceutical Committee (LPC) and the Local Medical Committee (LMC) for its area and have due regard to their representations. 	
FINANCIAL IMPACT:	
<p>If NHSE approve new pharmacy contractors, it is likely that additional locally commissioned services such as Stop Smoking, or Minor Ailments will be funded from either CCG or the council. Any additional costs to the council would be contained within the overall Public Health budget. Whilst services are not currently co-commissioned by the CCG and NHSE, if co-commissioning were to be put in place in the future, the implications of such co-commissioning including any amendments to such arrangements have the potential to impact upon local budgets. All costs associated with PNA recommendations being commissioned that impact upon NHSE, will be funded by them.</p>	

1. RECOMMENDATIONS

That Health and Wellbeing Board:

- 1.1 Agree the publication of the Pharmaceutical Needs Assessment (PNA), to take place by 1 April 2015, in accordance with the statutory requirements. The Draft PNA can be viewed online:
<http://egeprapwv01lc.lcbau.croydon.net/akscroydon/images/att5257.pdf>
- 1.2 Delegate responsibility to the Health and Wellbeing Board Executive Group for ongoing maintenance of the PNA, as per the regulations outlined above, until such time the PNA will be reviewed in 2018.
- 1.3 Be provided with an annual update from Health and Wellbeing Executive Group on maintenance of the PNA and progress of the recommendations.

2. EXECUTIVE SUMMARY

- 2.1 Croydon's Health and Wellbeing Board (HWB) have a duty, under the National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 ("The regulations"), to prepare and agree a Pharmaceutical Needs Assessment (PNA) for the Borough. The Director of Public Health was asked to lead the development of a new PNA for the borough.
- 2.2 This report sets out the process taken by Croydon in developing the PNA, followed by a set of recommendations that the Borough will encourage NHS England (NHSE) to adopt when considering future applications for opening new pharmacies, approving/ declining amendments to an existing pharmacy, or making any changes to commissioned services. Although outside the remit of the PNA Guidance, this opportunity was used to assess needs of all locally commissioned services to provide a holistic view.

3. BACKGROUND

- 3.1 The provision of NHS Pharmaceutical Services is a controlled market. Any Pharmacist, or dispensing appliance contractor, who wishes to provide NHS Pharmaceutical Services, must apply to be on the Pharmaceutical List. The Regulations set out the system for market entry.
- 3.2 Under these Regulations, Health and Wellbeing Boards (HWBs) are responsible for publishing a Pharmaceutical Needs Assessment (PNA).
- 3.3 A PNA sets out a statement of the pharmaceutical services which are currently provided, together with when and where these are available to a given population.
- 3.4 The PNA is subsequently used by NHS England to consider applications to open a new pharmacy or to move an existing pharmacy and when commissioning services. It will also be a reference source for existing NHS pharmaceutical services contractors who may wish to change the services they provide and/or by potential new entrants to the market.

- 3.5 The HWB also has the duty to maintain the PNA, in response to changes in the availability of pharmaceutical services. This is either through revising the PNA or, where this is thought to be disproportionate, through the issue of a supplementary statement setting out the change(s). A map of provision must be kept up to date. It is proposed that this monitoring and review function of the PNA be delegated to the Health and Wellbeing Board Executive Group (“the Executive Group”) for the period of applicability of this PNA, along with a requirement for the Executive Group to report annually to the HWB on progress and actions taken in fulfilment of this function.
- 3.6 A new PNA must be published every 3 years. The HWB must make the PNA, and any supplementary statements, available to NHS England, neighbouring HWBs and the public.
- 3.7 The HWB must also respond to consultations, by a neighbouring HWB, on a draft of their PNA. In doing so, the HWB must consult with the Local Pharmaceutical Committee (LPC) and the Local Medical Committee (LMC) for its area and have due regard to their representations. The Croydon PNA Steering Group has responded to four of Croydon’s five neighbouring HWBs draft PNA consultations. This includes: Surrey, Sutton, Merton and Bromley. As yet Lambeth HWB are yet to publish their draft PNA for consultation, but the PNA Steering Group will respond in due course.

4. DEVELOPMENT OF THE CROYDON PNA

- 4.1 The following steps were taken to develop a Croydon PNA:
- Established a multi-agency partnership board to support development of the Croydon PNA. Representation was made up from stakeholders in Pharmacy, the Clinical Commissioning Group, Local Authority, Integrated Commissioning Unit, NHS England, Local Healthwatch, Local Medical Committee and the Local Pharmaceutical Committee. A Terms of Reference is accessible on Appendix A. The steering group met 4 times during the PNA development.
 - Webstar Lane Ltd was appointed to provide subject matter expertise and project management support for development of the PNA following a competitive procurement exercise
 - An information and data gathering exercise was conducted on currently commissioned pharmaceutical services and to also gain a better understanding of the health needs of the Croydon population. Information was requested from managers and commissioners within NHSE and Croydon Council
 - A Questionnaire was designed and disseminated to community pharmacies within the Borough to verify current service provision and to secure insights into other aspects of service delivery, such as future development of Healthy Living Pharmacies or newly commissioned services (i.e. Alcohol Screening [Identification and Brief Advice]). There was a response rate of 99% for this survey.
 - A desktop review of the Croydon Joint Strategic Needs Assessment was conducted as well as a number of other key strategies including CCG strategic priorities, public health priorities and Better Care Fund (A comprehensive list can be found in the PNA in section 2.4).

- A patient questionnaire was produced and disseminated to patients to assess and views of their experiences of using Croydon Pharmaceutical service were sought. 349 responses were received.
- A draft PNA was prepared and published for a formal consultation, which was conducted between 6 November 2014 and 6 January 2015. The responses from the consultation can be viewed in Appendix i of the PNA suite of documents. Further information on the consultation can be found in section 5 below
- Throughout the PNA Croydon have considered and documented the potential future pharmaceutical needs of our population, together with opportunities to secure improvements in the services provided – Further information on service integration can be found below in section 7.
- A draft PNA has been prepared and is submitted to the HWB requesting sign off for publication. A set of recommendations were identified for NHSE attention, which can be found in paragraph 4 below.

5. RECOMMENDATION FROM THE PNA FOR NHS ENGLAND'S ATTENTION

- 5.1 As set out above, the provision of NHS Pharmaceutical Services is a controlled market. Any pharmacist, or dispensing appliance contractor, who wishes to provide NHS Pharmaceutical Services, must apply to be on the Pharmaceutical List and the system for market entry is governed by the Regulations.
- 5.2 The draft PNA which has been developed for Croydon is subsequently used by NHS England to consider applications to open a new pharmacy or to move an existing pharmacy and when commissioning services. It will also be a reference source for existing NHS pharmaceutical services contractors who may wish to change the services they provide and/or by potential new entrants to the market.
- 5.3 The draft Croydon PNA identifies current and anticipated future demand on pharmaceutical services and provision within the Borough. In summary, the following recommendations are proposed for adoption by HWB for submission to NHS England: (Please refer to section 3.5 in the PNA for additional detail)
- 5.4 The Croydon Health and Wellbeing Board Executive Group will request an annual update from NHSE as part of their monitoring of the PNA.
- 5.5 Current Need
- Enhanced services
 - London Pharmacy Vaccine Services – in terms of further provision, we wish to see this service commissioned from as many Croydon pharmacies as possible in order to help improve historically low immunisation rates

5.6 Future Need

- Essential Services
 - An additional pharmacy in each of the New Addington & Selsdon (New Addington ward) and the East Croydon localities. This is to ensure there is sufficient capacity to meet the pharmaceutical needs of a growing population in both localities; and the anticipated higher influx of commuters into the East Croydon locality
 - Additional hours if GPs move to a 7 day a week service, particularly in the Purley, New Addington & Selsdon and parts of the Mayday and Woodside and Shirley localities; however, this will be dependent upon operational arrangements for GP opening, once known
 - An arrangement to ensure overnight access to medicines, in the event that the LPS Out of Hours contract is terminated
 - An arrangement to ensure users of the Edridge Road GP Led Health Centre & Walk In Centre can access dispensing services in the event that the Fairview LPS contract is terminated
 - For future applications, Croydon has set out an aspiration that extended hour opening forms part of core hours (refer to page 110 in the PNA)

5.7 Current Improvements and Better Access

- All services (essential, advanced, enhanced and locally commissioned)
 - Additional hours, on a Sunday between the hours of 5pm and 8pm would facilitate more convenient access to dispensing services, for people using the minor injuries unit at Purley War Memorial Hospital (Purley Ward, Purley Locality)
 - Extending opening hours on weekday evenings and at weekends, would improve access and choice to all pharmaceutical and locally commissioned services. This is particularly the case for the New Addington & Selsdon Locality, Purley (wards in the South and East of the locality), East Croydon (Fairfield, Croham and Waddon) and small areas of Mayday. This would facilitate ensuring there is sufficient capacity as the population of Croydon grows as well as securing improvements for the working population who may prefer to access pharmacy services outside of regular opening hours
- Meeting the needs of those with a disability
 - There are opportunities for more pharmacies to take steps and provide greater support for people with disabilities
- Advanced services
 - Medicines Use Reviews (MUR) and New Medicines Services (NMS) – Croydon wish to see all pharmacies offering and actively delivering these services (unless there is a valid reason not to do so)
- Locally Commissioned Services
 - Needle & Syringe Programme – Croydon have identified gaps on weekday mornings (before and including 8am), Saturday evenings (7pm onwards) and on Sundays in some localities. A review of the programme is underway which will include strategic placing of the service within pharmacies according to need; and to improve access during extended hours

- Supervised consumption service - we have identified gaps on weekday mornings (before and including 8am), Saturday evenings (7pm onwards) and on Sundays in some localities. The service is being re-commissioned and access, including during extended hours, will be addressed as part of this process
- Enhanced Sexual Health – we have identified that there is limited access to the service during extended hours; there are plans to commission up to an additional 5 pharmacies to provide this service to facilitate improved alignment with need and better access
- NHS Health Check Programme – Croydon wish to see a pharmacy provider in Thornton Heath to improve access and to provide additional capacity for Health Checks within this locality 111

5.8 Future improvements or better access

- All services (essential, advanced, enhanced and locally commissioned)
 - Extending opening hours on weekday evenings and at weekends, would improve access and choice to all pharmaceutical and locally commissioned services. This is particularly the case for the New Addington & Selsdon Locality, Purley (wards in the South and East of the locality), East Croydon (Fairfield, Croham and Waddon) and small areas of Mayday. This would facilitate ensuring there is sufficient capacity as the population of Croydon grows as well as securing improvements for the working population who may prefer to access pharmacy services outside of regular opening hours
- Advanced services
 - MUR and NMS – Croydon wish to see all new pharmacies offering and actively delivering these services (unless there is a valid reason not to do so)
- Meeting the needs of those with a disability
 - Croydon wish to ensure that new pharmacies have taken appropriate steps to meet the needs of people with disabilities. Specifically, we anticipate that all premises have step free access and that public areas of the pharmacy are accessible to wheel chairs; that a hearing loop is installed and that the pharmacy provides large print labels and labels with braille

5.9 In depth conclusions of future capacity can be found on the following pages of the PNA for the following services:

- Essential Services - Page 50 - 51
- Enhanced Services - Page 70
- Advanced Services - Pages 56, 60, 63, 66,
- Locally Commissioned – Services 75, 79, 83, 84, 91, 95, 99, 101

5.10 HWB should be aware that whilst every endeavour is made to make NHSE aware of the needs of the borough, it is ultimately a decision which is made by the NHSE and the Council does not have a right of appeal against decisions made by NHSE which are contrary to the recommendations contained in the PNA. The Department of Health published guidance from May 2013, 'Pharmaceutical Needs Assessment: Information Pack for Health and Wellbeing Boards' states:

1. 'It should be noted that if a HWB identifies a need or improvement and better access, NHS England does not have to meet the need – this is because NHS

England may have other factors to take into account, i.e. other commissioning decisions.'

2. NHS England will be acting under an annual mandate from Secretary of State. Beyond that, NHS England should therefore be free to decide how best to meet its responsibilities for commissioning services according to the needs of the local population. We expect NHS England to weigh all the evidence carefully – taking account of pharmaceutical needs alongside other relevant factors. Placing an obligation on NHS England to fill a gap would hamper the Board's ability to make such robust commissioning decisions.'

6. CONSULTATION

6.1 A formal consultation ran from 6 November 2014 – 6 January 2015. Letters inviting the statutory list of consultees (below) were sent to responsible officers within each of the settings and the consultation was hosted on the Public Health webpage on the Croydon Council website.

6.2 The formal consultation was undertaken in accordance with the Pharmaceutical Services and Local Pharmaceutical Services Regulations 2013 which specifies both the time period for which the consultation must be open (a minimum of 60 days) and the parties with whom the HWB must consult. The statutory consultees for this purpose are:

- The Local Pharmacy Committee
- The Local Medical Committee;
- Any persons on the Pharmaceutical lists and any dispensing doctors list for the Borough area
- Any local pharmaceutical service chemist in its area with whom NHSE has made arrangements for the provision of any local pharmaceutical service;
- Healthwatch, or any other patient, consumer or community group within its area which in the view of the HWB has an interest in the provision of pharmaceutical services in its area
- Any NHS Trust or Foundation Trust within its area
- NHS England
- Any neighbouring Health and Wellbeing Board

6.3 Throughout the PNA development process Croydon have actively engaged with stakeholders and the public to build recommendations and identify areas of need.

6.4 A consultation report collating all responses can be found in Appendix I

6.5 As part of our statutory duty to respond to Neighbouring Borough's PNAs, we have responded to Surrey HWB, Bromley HWB, Merton HWB and Sutton HWB. Lambeth HWB are yet to go out to consultation.

7. Comments of Statutory Consultee from NHSE

7.1 NHS England responded to the consultation with the following comments

"A very detailed PNA, maps are very clear. The rationale for the PNA process is very clearly explained

Methodology to the PNA and the statutory requirements clearly explained. Clear summaries of locally commissioned services with future plans

The PNA is very information rich and would benefit from summary tables i.e. necessary and relevant services, summary of services provided by locality i.e. essential advanced, enhanced and locally commissioned services”

- 7.2 NHSE suggested a few minor amendments to the PNA, which were reflected in the final document and are listed in the consultation report, Appendix I.

8. SERVICE INTEGRATION

- 8.1 Throughout the PNA we have considered and documented the potential future pharmaceutical needs of our population, together with opportunities to secure improvements in the services provided.
- 8.2 The Croydon PNA Steering Group has also set out specific intentions in relation to services which we envisage will be commissioned from community pharmacy within the next 12 months and described our vision and ambition, for how community pharmacy may support the delivery of our local strategic priorities and public health outcomes.
- 8.3 It is our intention that the potential service developments (e.g. Healthy Living Pharmacies, Integrated Medicines optimisation and waste service, Integrated Healthy Lifestyle Service), set out on pages 103 - 110, will be considered alongside other priorities (e.g. Croydon Vision, Better Care Fund, CCG Priorities, PH Priorities and HWB Priorities) by Croydon Council and our partner organisations when developing future commissioning strategy.

9. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 9.1 If NHSE approve new pharmacy contractors, it is likely that additional locally commissioned services such as Stop Smoking, or Minor Ailments will be funded from either CCG or the council. Any additional costs to the council would be contained within the overall Public Health budget. Whilst services are not currently co-commissioned by the CCG and NHSE, if co-commissioning were to be put in place in the future, the implications of such co-commissioning including any amendments to such arrangements have the potential to impact upon local budgets. All costs associated with PNA recommendations being commissioned that impact upon NHSE, will be funded by them.

10. LEGAL CONSIDERATIONS

- 10.1 The Solicitor to the Council comments that there are no additional legal implications arising from the recommendations aside from those highlighted within the body of the report.

(Approved by: Jessica Stockton (Corporate Solicitor), for and on behalf of the Council Solicitor and Director of Democratic and Legal Services)

11. HUMAN RESOURCES IMPACT

11.1 There are no Human Resource implications associated with the recommendations of this report for the HWB.

12. EQUALITIES IMPACT

12.1 An Initial Equality Analysis was undertaken to ascertain the potential impact on protected groups compared to non-protected groups. This concluded that there was no need to conduct a full Equality Analysis as the Equality Analysis can be found as part of the suite of PNA material, Appendix J.

12.2 The PNA takes into consideration equality and inclusion issues for each of the commissioned services listed in Section 3 of the report.

12.3 The Croydon PNA recommends that in future to better meet the needs of those people with a disability, Croydon wishes to ensure that all new pharmacies take appropriate steps to meet the needs of people with disabilities. Specifically, we anticipate that all premises have step free access and that public areas of the pharmacy are accessible to wheel chairs; that a hearing loop is installed and that the pharmacy provides large print labels and labels with braille.

13. ENVIRONMENTAL IMPACT

13.1 There are no environmental impacts associated with the recommendations of this report for the HWB.

14. CRIME AND DISORDER REDUCTION IMPACT

14.1 There are no crime and disorder impacts associated with the recommendations of this report for the HWB.

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BACKGROUND DOCUMENTS: None