

HEALTH AND WELLBEING BOARD



TO:	Health and Wellbeing Board
FROM:	Dominic Harrison, Director of Public Health and Wellbeing
DATE:	10 th November 2021

SUBJECT: Pharmaceutical services consolidations and notifications

1. PURPOSE

The purpose of this paper is to update the Health and Wellbeing Board on practice relating to responding to Pharmacy consolidations and other notifications when received from NHS England.

2. RECOMMENDATIONS FOR THE HEALTH & WELLBEING BOARD

The Health and Wellbeing Board is asked to

- Agree this update on procedure

3. BACKGROUND

Local Government took on a new role when Public Health transferred from the NHS in April 2013, including the production of a Pharmacy Needs Assessment (PNA).

The PNA aims to identify whether current pharmacy service provision meets the needs of the local population and considers whether there are any gaps in service delivery.

The PNA is used by NHS England in its determination as to whether to approve applications to join the pharmaceutical list under The National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013.

Alongside the role of overseeing production of the PNA, the Health and Wellbeing Board has a statutory duty to respond to NHS England when they receive applications to consolidate pharmaceutical services. Notifications of other changes to pharmaceutical services are also sent to the Health and Wellbeing Board, but do not require a statutory response.

This paper outlines the process for responding to consolidation applications and other notifications from NHS England.

4. RATIONALE

Consolidation applications:

The NHS (Pharmaceutical Services, Charges and Prescribing) (Amendment) Regulations 2016 requires the Health and Wellbeing Board (HWB) to make representations on consolidation

applications to NHS England. A consolidation is where community pharmacies on two or more sites propose to consolidate to a single site.

These representations must indicate whether, if the application were granted, in the opinion of the Health and Wellbeing Board, the proposed removal of premises from the pharmaceutical list would or would not create a gap in pharmaceutical services.

Members of the Public Health Department receive consolidation notifications from NHS England, on behalf of the Health and Wellbeing Board via email. Upon receipt of this email, a 45 day period is given to respond. As this period may or may not fall within the schedule for Health and Wellbeing Board meetings, the following process is proposed:

- 1) Analysis of the proposed consolidation is undertaken by members of the Public Health Department, including an assessment of geographic proximity, accessibility, services provided (including commissioned services) and future developments within the area.
- 2) Members of the Health and Wellbeing Board will be emailed by a member of the Public Health Department with a brief to describe the analysis results and asked for their comments. To keep within timescales specified by NHS England, members of the Health and Wellbeing Board will be given two weeks (14 days) to provide comments. Comments will be collated by members of the Public Health Department.
- 3) The Director of Public Health will be briefed on the results of the analysis and any comments received, and will make a delegated decision on whether a proposed consolidation is likely to create a gap in pharmaceutical services that could be met by a routine application.
- 4) The Director of Public Health will then provide a response to NHS England, on behalf of the Health and Wellbeing Board.
- 5) A summary report noting the HWBs representation and the subsequent decision whether to grant the consolidation request is provided to the HWB at the next scheduled meeting.
- 6) Notification documentation will be uploaded to the Pharmaceutical Needs Assessment Statements page of the Council website www.blackburn.gov.uk

Other notifications:

Other pharmacy notifications received by the Public Health Department will be forwarded to the Director of Public Health (DPH) for review. If the DPH assesses a response is required, steps 2) to 5) will be followed. Notifications will be included in the summary report to the Health and Wellbeing Board regardless of whether a response has been made.

5. KEY ISSUES

It is a statutory responsibility of the Health and Wellbeing Board to respond to NHS England.

The applicant pharmacy may challenge NHS England's decision, so the response must be robust and made on relevant and appropriate information.

6. POLICY IMPLICATIONS

There are no direct policy implications.

7. FINANCIAL IMPLICATIONS

There are no direct financial implications.

8. LEGAL IMPLICATIONS

The NHS (Pharmaceutical Services, Charges and Prescribing) (Amendment) Regulations 2016 requires the Health and Wellbeing Board to make representations on consolidation applications to NHS England. The process proposed in this paper is to support the Health and Wellbeing Board in meeting its statutory duty in this regard.

9. RESOURCE IMPLICATIONS

Pharmaceutical services consolidation notifications are received from NHS England on an infrequent basis and as such the resources for undertaking analysis of the implications of the pharmacy consolidation can be met within current staffing and resource allocations.

10. EQUALITY AND HEALTH IMPLICATIONS

None

11. CONSULTATIONS

There is no need to undertake consultation.

VERSION:	1.1
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DATE:	10 th November 2021
BACKGROUND PAPER:	

