

HEALTH AND WELLBEING BOARD



TO:	Health and Wellbeing Board
FROM:	Abdul Razaq, Director of Public Health and Wellbeing
DATE:	6th September 2022

SUBJECT: Pharmaceutical Needs Assessment 2022 update and sign off

1. PURPOSE

The purpose of this paper is to update the Health and Wellbeing Board on the pan-Lancashire Pharmaceutical Needs Assessment (PNA) following a statutory period of consultation, seek approval for proposals to sign off the final document, and outline the process for future updates to the PNA.

2. RECOMMENDATIONS FOR THE HEALTH & WELLBEING BOARD

The Health and Wellbeing Board is asked to

- Note the findings of the PNA 2022, including that there is currently no need for any additional pharmacies within Blackburn with Darwen, as current pharmaceutical service provision is deemed adequate across pan-Lancashire.
- Note the recommendations from the PNA 2022.
- Delegate responsibility for sign off of the final PNA document to the Chair of the Health and Wellbeing Board, to facilitate its publication by 1 October 2022.

3. BACKGROUND

Development of a Pharmaceutical Needs Assessment or PNA is a statutory responsibility of Health and Wellbeing Boards (HWBs). The 2022 PNA for Lancashire has been developed as a single set of documents covering the area of the three HWBs, managed by a steering group of Blackburn with Darwen, Blackpool and Lancashire County council officers, staff from NHS England and Community Pharmacy Lancashire. Due to the changes within Clinical Commissioning Groups and the Integrated Care Board, staff from these organisations did not attend the steering group meetings, but were engaged in the development of specific sections of the report. The 2022 PNA refers to Clinical Commissioning Groups (CCGs) as commissioners within the document, as they were a statutory commissioning body at the point in time the document was written (February 2022).

The PNA describes the needs of the citizens of the pan-Lancashire area for pharmacy services, and provides specific information for each of the HWB areas.

- pharmacies across pan-Lancashire and the services they currently provide
- maps of providers of pharmaceutical services across the pan-Lancashire area
- pharmaceutical contractors in neighbouring HWB areas
- potential gaps in provision and likely future needs for the population of pan-Lancashire
- opportunities for existing pharmacies to provide local public health services

The PNA is used to support NHS England / Improvement North (Lancashire and South Cumbria) in making decisions to approve/reject applications to join the pharmaceutical list (also known as market entry), as well as applications to change existing pharmaceutical services. When making the decision NHS E / I is required to refer to the local PNA. As these decisions may be appealed or challenged via the courts, it is important that PNAs, both in their content and in the process of their construction, comply with regulations and that mechanisms are established to keep the PNA up-to-date. In accordance with these regulations, PNAs are updated every three years. Due to the COVID pandemic response, legal regulations were changed to allow a change in the timescales and moved the requirement to publish a PNA from 1 April 2022 to 1 October 2022.

In undertaking the PNA, the pan-Lancashire steering group sought the views of stakeholders to identify issues that affect the commissioning of pharmaceutical services and to meet local health needs and priorities. A survey was administered as part of this PNA, targeting pharmacies, to collect information on the services they provide. In addition, a consultation with pharmacy users was undertaken by Healthwatch Blackburn with Darwen, Healthwatch Blackpool and Healthwatch Lancashire.

The draft full PNA 2022 report and appendices are published for reference here:

<https://www.lancashire.gov.uk/lancashire-insight/health-and-care/health/health-and-care-services/consultation-on-the-pan-lancashire-draft-pharmaceutical-needs-assessment-pna-2022/?ID=431>

The legislation specifies that the statutory consultation period for the PNA must run for a minimum of 60 days. The consultation for the pan-Lancashire PNA will run from 1 July 2022 to 1 September 2022. The following stakeholders were invited (via email) to respond to the consultation:

- persons on the pharmaceutical list (e.g. pharmacies)
- NHS trusts and NHS foundation trusts in the area
- NHS England
- Community Pharmacy Lancashire
- Lancashire and South Cumbria Local Professional Network (LPN) – Pharmacy
- eight local clinical commissioning groups (CCGs)
- Healthwatch Blackburn with Darwen, Healthwatch Blackpool and Healthwatch Lancashire (to circulate to networks)
- Blackburn with Darwen, Blackpool and Lancashire County Council health and wellbeing boards
- Neighbouring health and wellbeing boards

In addition to the direct email, the consultation was promoted via local authority Twitter accounts.

4. RATIONALE

From 1st April 2013 every Health and Wellbeing Board in England has had a statutory responsibility to publish and keep up to date a statement of the needs for pharmacy services for its local population, known as the Pharmaceutical Needs Assessment (PNA).

A published PNA has a maximum lifetime of three years.

A pan-Lancashire steering group was set up to review and update the current PNAs published in spring 2018 for each of the three Health and Wellbeing Boards.

5. KEY ISSUES

Key findings:

- There are 23 pharmaceutical service providers per 100,000 registered population in pan-Lancashire, with the England average being 21 per 100,000. For Blackburn with Darwen this is a rate of 31 per 100,000.
- There are 46 pharmacies in Blackburn with Darwen a reduction from 50 in 2018.
- Across the pan-Lancashire area there is a good coverage of pharmacies and over 98% of the population has access to a pharmacy within a 20 minute drive.
- For Blackburn with Darwen 100% of the population are within a 20 minute drive of a pharmacy.
- The resident facing consultation pharmacy survey (47 responses from BwD from an overall 229 across pan-Lancashire) found that of the pan-Lancashire area, 84.6% of people consulted rated their overall experience of accessing pharmacy services as excellent or good.
- There is a wide range of both local authority and CCG commissioned services available within pharmacies across pan-Lancashire, although there is some degree of variation between both local authorities and individual CCGs. It should be noted that there are different operating models for services across the patch, involving non-pharmacy delivery. BwD BC commissioned services as follows:
 - needle and syringe exchange service
 - supervised consumption
 - stop smoking service/nicotine replacement therapy
 - emergency hormonal contraception
- The survey of pharmacies in the pan-Lancashire area (208 responses, 26 in Blackburn with Darwen) found that 84.6% delivered medicines free of charge on request (88.5% in Blackburn with Darwen) and more than 80% of pharmacies and dispensing surgeries in pan Lancashire have wheelchair access to their consultation area (Blackburn with Darwen 84.6%)
- There is currently no need for any further additional pharmacies as current pharmaceutical service provision is deemed adequate across pan-Lancashire. This will be monitored through the process for receiving notifications of pharmacy closures and consolidations from NHS E/I and the subsequent production of supplementary notices to the PNA.

A summary of all findings from the draft PNA can be found in the executive summary.

https://www.lancashire.gov.uk/media/936117/executive-summary-pna-2022_draft-3.pdf

Recommendations from the PNA 2022 are:

- Despite the modest decline in overall provision of pharmaceutical service across Blackburn with Darwen, Blackpool and Lancashire County Council compared to 2018, the level of current provision is nevertheless deemed to remain adequate, although this is a trend that needs to continue to be carefully monitored.
- At present there is no need for additional pharmaceutical contracts, but should current provision significantly change in advance of the next PNA, particularly because of any new housing developments or any further future closure of existing pharmacy provision, then that position should be reconsidered.
- Although there is a wide range of both local authority and CCG commissioned services across Lancashire, it is recommended that all procurement rules and requirements are adhered to, and that all suitable options and models of delivery are considered when commissioning community-based services.
- It is recommended that NHSE/I, the respective local authorities and CCGs continue to work with both Lancashire Pharmaceutical Committee and Community Pharmacy Lancashire to explore how widening the role of community pharmacies further would benefit our local residents. As part of this, it is recommended that any development in commissioned services for community pharmacies utilise the best possible evidence and to also evaluate

any new services, ideally using an evaluation framework that is planned before implementation.

- The full range of services pharmacies provide may not always be fully known to citizens. There is an opportunity for all pharmacies, and social and healthcare agencies, to further publicise and promote pharmacy services.
- From the feedback collected, it appears that overall, patients are satisfied with the service that their pharmacy provides. All pharmacies and healthcare agencies should be encouraged to publicise and promote pharmacy services and specifically to make more readily available and accessible information about out-of-hours provision that might be required for urgent/emergency care needs.
- This newly revised 2022 PNA should form a pivotal role for any future development of pharmacy provision and in particular to help identify any need for additional pharmacies should current provision significantly change between now and the next planned PNA in three years' time

PNA 2022 sign off for publication:

A summary of responses to the draft PNA 2022 formal consultation (from 01 July 2022 to 01 September 2022) will be provided verbally at the health and wellbeing board meeting on 6th September 2022.

Due to the scheduling of meetings and the legal requirement to publish the document before 1 October 2022 it is proposed that sign off of the final document with amendments following the consultation, is delegated to the Chair of the Health and Wellbeing Board.

6. POLICY IMPLICATIONS

There are no direct policy implications.

7. FINANCIAL IMPLICATIONS

There are no direct financial implications.

8. LEGAL IMPLICATIONS

The statutory responsibility for PNAs transferred from PCTs to the Health and Well-being Boards on the 1 April 2013, as a result of the changes introduced by the Health and Social Care Act 2012. At the same time, the responsibility for pharmaceutical market entry decisions transferred from PCTs to NHS E / I. In particular, the Health and Well-being Board had a duty to deliver a Pharmaceutical Needs Assessment before April 2015 under Section 128A of National Health Service Act 2006 (as amended by the Health and Social Care Act 2012). Thereafter this assessment needs to be delivered every 3 years. The regulations setting out the responsibilities are contained in Part 2 National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 ('the Regulations').

The PNA assists in the commissioning of pharmaceutical services for local priorities and will be used by NHS E / I when making decisions on applications to open new pharmacies. These decisions may be appealed by pharmacies and challenged via the courts. Therefore it is vital to comply with regulations and that systems are put in place to keep the PNA up to date. The

Regulations prescribe the matters which the Health and Well-being Board must have regard to when undertaking the PNA.

Regulation 8 sets out consultation requirements.

9. RESOURCE IMPLICATIONS

The resources for producing the PNA have been incorporated into existing Public Health activity and therefore there are no additional resource implications.

10. EQUALITY AND HEALTH IMPLICATIONS

The PNA aims to

- Identify gaps in provision or accessibility, including by area or population group
- Help support a healthier population

An equality impact assessment has been undertaken by Lancashire County Council. This will be finalised once the formal consultation has ended.

11. CONSULTATIONS

A formal (minimum 60-day) public consultation was undertaken to seek the views of members of the public and other stakeholders, on whether they agree with the contents of this PNA and whether it addresses issues that they consider relevant to the provision of pharmaceutical services. The feedback was gathered and logged and all necessary changes will be made to the PNA document.

VERSION:	2
CONTACT OFFICER:	Catherine Taylor, Consultant in Public Health Elise Carroll, Public Health Intelligence Specialist
DATE:	28 th July 2022
BACKGROUND PAPER:	Draft full PNA 2022 https://www.lancashire.gov.uk/lancashire-insight/health-and-care/health/health-and-care-services/consultation-on-the-pan-lancashire-draft-pharmaceutical-needs-assessment-pna-2022/ PNA executive summary https://www.lancashire.gov.uk/media/936117/executive-summary-pna-2022_draft-3.pdf

