

Item No. 13.	Classification: Open	Date: 16 March 2015	Meeting Name: Health and Wellbeing Board
Report title:		Southwark Pharmaceutical Needs Assessment (PNA) Final	
Wards or groups affected:		All	
From:		Director of Public Health	

RECOMMENDATIONS

1. The Southwark Health and Wellbeing Board (HWBB) review the feedback received from the consultation on the Draft PNA.
2. The HWBB agree and sign off the amendments required to comply with the NHS (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013 (SI 2013 No. 349).
3. Agree a process for the final sign off the revised PNA so that it can be published on the Southwark Council website on the 30 March 2015.

EXECUTIVE SUMMARY

4. Southwark's Health and Wellbeing Board (HWB) has a statutory responsibility for developing a Pharmaceutical Needs Assessment (PNA) as set out under the NHS (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013 (SI 2013 No. 349). A PNA is a document which records the assessment of the need for pharmaceutical services within a specific area. The same Regulations require NHS England to use the PNA to consider applications to open a new pharmacy, move an existing pharmacy or to commission additional services from pharmacy. The consultation of the draft Southwark PNA ended on 28 February 2015. This paper outlines the feedback received and the proposed amendments to the draft PNA and associated appendices for the Health and Wellbeing Board to consider and sign off.

BACKGROUND INFORMATION

5. Southwark's Health and Wellbeing Board (HWB) is developing a new Pharmaceutical Needs Assessment (PNA). This is a statutory HWB responsibility, as set out under the NHS (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013 (SI 2013 No. 349).
6. A PNA is a document which records the assessment of the need for pharmaceutical services within a specific area. As such, it 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 same Regulations require NHS England to use the PNA to consider applications to open a new pharmacy, move an existing pharmacy or to commission additional services from pharmacy.

7. Southwark's HWB established a PNA Steering Group to oversee the development of the new PNA. This group includes membership from our partner organisations and the Local Pharmaceutical Committee.
8. As part of the development process, the Regulations require that the HWB undertakes a formal consultation on a draft of its PNA. This ran from 19 December 2014 until midnight on 28 February 2015. All responses to the consultation were requested in writing, using the standard questionnaire which has been developed to facilitate comment and feedback.

KEY ISSUES FOR CONSIDERATION

9. This section outlines in summary the key issues we have taken into consideration in amending the draft PNA following feedback from various stakeholders.
10. We responded to NHS England's checklist on whether the PNA met the regulations (summarised in appendix 1).
11. NHS England provided an assessment of the draft Southwark PNA against Schedule 1 paragraph 1 to 6 (14 sub-sections altogether). One sub-section requires completion as part of the final report (reporting on the consultation feedback). The draft PNA was deemed by NHS England to fully meet 7/13 other regulations; partially meet 2/13 and not meet 4/13.
12. For the 6 areas partially or not met we have amended the draft PNA to reflect the comments from NHS England so that the final PNA fully meets the regulations.
13. As part of the consultation feedback to the draft PNA there were 21 responses altogether (including from 17 local pharmacies, the Local Pharmaceutical Committee (LPC), the Local Medical Committee (LMC), NHS England, and South London and Maudsley (SLAM) NHS Trust. In addition there were 98 qualitative responses which we have grouped together in the table below.
14. Summary feedback from the consultation shows:
 - the purpose, scope and local context of the PNA been explained sufficiently within the draft PNA document
 - All respondents agreed that the PNA had covered the purpose and scope and the majority (19/21) agreed that the local context was also covered (2 were not sure).
 - there is a reasonable description of what is currently provided by pharmacies currently and if anything is missing from the document that is currently provided
 - The majority of respondents (17/21) agreed that the PNA provided a reasonable description of what is currently provided – 3 were “not sure” and 1 reported “no”.

- In addition the majority (17/21) were not aware of any pharmaceutical services currently provided which have not been included within the PNA. Two were unsure and 1 was aware but there was no qualitative feedback as to what this service was.
- the accuracy of understanding of the pharmaceutical needs of the population clearly reflected in the draft PNA
 - The majority of respondents (15/21) felt that the pharmaceutical needs of the population have been accurately reflected throughout the PNA; 6/15 were not sure. We have responded to all comments received about this.
- respondents agree with the conclusions reached and any additional information required
 - Essential services - 17/18 agreed; 1 not sure
 - Medicines Use Reviews - 19/19 agreed
 - New Medicine Service - 17/19 agreed; 2 not sure
 - Appliance Use Reviews - 16/19 agreed; 2 not sure; 1 no
 - Stoma Appliance Customisation Services - 16/19 agreed; 1 not sure; 2 no
 - Seasonal Influenza Vaccination Service - 19/19 agreed
 - Stop smoking - 18/18 agreed
 - Sexual health - 17/18 agreed; 1 no
 - NHS Health Checks - 17/18 agreed, 1 not sure
 - Supervised administration service - 15/18 agreed; 3 no
 - Needle and syringe exchange service - 17/18 agreed; 1 no
 - Free (vitamin) D distribution - 18/18 agreed
- sufficient information has been provided for market entry and how service commissioners may wish to commission services from pharmacies in the future.
 - The market entry question was specifically for NHS England and its response was “not sure” for the reasons outlined in its checklist above. We have now addressed all these areas and are amending the draft PNA to reflect this feedback.
 - We had one commissioning response back which agreed that there was sufficient information in the draft PNA on how commissioners may want to commission pharmaceutical services in the future.

- A summary of the thematic issues from the qualitative feedback is given in the table below. There were 98 qualitative responses altogether.

15. Themes emerging from the feedback consultation:

Theme	Count	%
Consideration commissioners / providers (out of PNA scope)	40	41%
Amendment	23	23%
Response	11	11%
Missing Information	11	11%
Clarity / Interpretation / Wording	10	10%
Gap analysis	2	2%
Additional Analysis	1	1%
Grand Total	98	100%

16. The majority of the comments were out of scope of the PNA but important for further consideration by commissioners, providers or both. The feedback also has led to a number of amendments being made in the final PNA, completion of missing information, further clarity and some responses. A full list of qualitative responses is given in appendix 2 for the HWBB to consider and a summary will be published in the final PNA.

Policy implications

17. Not applicable

Community and equalities impact statement

18. The PNA identifies and describes the pharmaceutical services in Southwark and their accessibility (location and opening times) to the local population. The PNA seeks to ensure better access to pharmacy services across Southwark. Equalities impact statements are described with the draft PNA in section 3.

Legal implications

19. As of the 1st April 2013 the Health and Wellbeing Board has a statutory responsibility to assess the needs for pharmaceutical services in Southwark. There is a legal requirement for Southwark's Health & Wellbeing Board to publish a new PNA by the 1st April 2015. The PNA report will assist the board in fulfilling this requirement. The PNA has to be refreshed every three years or earlier if there are any major changes. For minor changes supplementary information can be published in between the 3 year cycle.

Financial implications

20. There are no direct financial implications contained within this report. However, the PNA will inform the services commissioned in pharmacies by the local authority (Public Health), NHS England and NHS Southwark Clinical Commissioning Group.

BACKGROUND PAPERS

Background Papers	Held At	Contact
Draft PNA	www.southwark.gov.uk/pna	Claudia Graig

APPENDICES

No.	Title
Appendix 1	Southwark Health and Wellbeing Board response to London Region Pharmaceutical Services Regulations Committee 23 February 2015
Appendix 2	Draft Consultation Report

AUDIT TRAIL

Lead Officer	Dr Ruth Walls, Director of Public Health	
Report Author	Dr Hiten Dodhia, Consultant in Public Health Medicine	
Version	Final	
Dated	11 March 2015	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Director of Legal Services	No	No
Strategic Director of Finance and Corporate Services	No	No
Strategic Director of Children's and Adults' Services	No	No
Date final report sent to Constitutional Team		11 March 2015