

Briefing Subject: Pharmaceutical Needs Assessment  
For the attention of: Herefordshire Health and Wellbeing Board

## **Pharmaceutical Needs Assessment**

### **Overview**

If a person (a pharmacist, a dispenser of appliances, or GP) want to provide NHS pharmaceutical services, they are required to apply to the NHS to be included on either the pharmaceutical or dispensing doctor list. Pharmaceutical and dispensing doctor lists are compiled and held by NHS England. This is commonly known as the NHS “market entry system”.

From 1st April 2013, Health and Wellbeing Boards are responsible for developing and updating Pharmaceutical Needs Assessments (PNAs). The primary purpose of a PNA is to guide the commissioning of community pharmacy services. The PNA will also inform the commissioning of services that deliver the same outcome as ‘pharmaceutical services’.

A person who wishes to provide NHS pharmaceutical services must generally apply to NHS England to be included on a relevant list by proving they are able to meet pharmaceutical needs as set out in the relevant Pharmaceutical Needs Assessments.

### **Information to be contained in Pharmaceutical Needs Assessments**

#### **Necessary services: current provision**

In order to assess the adequacy of provision, all providers of such services need to be mapped. This mapping will need to include providers and premises within the HWB area and also those that may lie outside but who provide services to the population within the HWB area.

#### **Necessary services: gaps in provision**

Having assessed local needs and the current provision of services, the PNA needs to identify any gaps that need to be filled. The PNA may also identify a gap in provision that will need to be provided in future circumstance, for example if a new housing development is being planned.

Gaps in provision are not just gaps in pharmaceutical health needs but also gaps by service type. For example, a locality may have adequate provision of essential services but may have need for more specialist services, such as the management of a long-term condition.

Examples of need, or gaps in service, that Health and Wellbeing Boards may identify include:

- Inadequate provision of essential services at certain times of the day or week
- Opening hours that do not reflect the needs of the local population
- Areas with little or no access to pharmaceutical services, etc.

#### **Other relevant services: current provision**

The Health and Wellbeing Board will have identified those services that are necessary for the provision of adequate pharmaceutical services. There may however, be pharmaceutical services that provide improvements to the provision or better access for the public. The PNA must include a statement of these services.

### Improvements and better access: gaps in provision

It is important that the PNA identifies services that are not currently being provided by which will be needed to secure future improvements to pharmaceutical services – common examples of this are major industrial, communications or housing development, service redesign or re-provision. Provision may also change where significant economic downturn is expected.

HWBs can also identify those services, which are currently not being commissioned by NHS England, local authorities or CCGs but may be service that could be commissioned in the future.

NHS England does not have meet the needs identified by the Health and Wellbeing Board.

### Other services

The PNA must include a statement outlining the services identified in the assessment which affect pharmaceutical needs. There may be services provided or arranged by the Health and Wellbeing Board, NHS England, a CCG and NHS trust (including foundation trusts) which could, if they were included in a PNA, be provided by pharmaceutical services contractors. For example, a large health centre providing a stop smoking service. Only those NHS services which affect the need for pharmaceutical services or potential pharmaceutical services need to be included.

### How the assessment was carried out

The PNA must include a statement setting out:

- how the Health and Wellbeing Board has determined the localities in the area,
- the different needs of different localities in its area including the needs of those people in the area sharing a protected characteristic, for example, a large travellers' site; and
- a report on the consultation undertaken on the PNA.

### Maps

All Health and Wellbeing Boards are also required to include a map in their PNA which identifies the premises at which pharmaceutical services are provided. This must be kept up to date.

### **Current position with regard to Herefordshire's HWB PNA**

NHS North West Commissioning Support Unit (NWCSU) has been drafting the PNA, which needs to go out on 19<sup>th</sup> January 2014 for the formal 60 day consultation period as required by legislation.

Due to the tight deadlines it will not be possible for the draft PNA to be made available to the HWB for document submission for the January meeting. The PNA steering group request the HWB to virtually approve the document and will be given opportunity to comment from the 5<sup>th</sup> to 13<sup>th</sup> January 2015. Any amendments identified will be actioned and the HWB will have delegate responsibility to the Cabinet Member for Health and Wellbeing to approve the final document for sending out to consultation.

It is important to understand that once the consultation period ends on 20<sup>th</sup> March 2015 it will be necessary to collate responses and make any changes necessary to the consultation draft. This will then need to come back to the HWB on 12<sup>th</sup> May 2015 for approval ready for publication.

<b>Overview and update of project timeline</b>
✓ <i>October 2014 the PNA project started</i>
✓ <i>During 17<sup>th</sup> October 2014 and 15<sup>th</sup> December 2014 we surveyed the public, pharmacy and dispensing practices for their opinion of pharmaceutical services in the Herefordshire area.</i>
✓ <i>There was limited response to the public survey and a lesson for future surveys would be to carry out sustained social media advertisement (e.g. via Twitter, Facebook etc.) throughout the response period. Also send the survey direct to council listed public focus groups by email for them to urge their members to respond. Also advertisement in a local free newspaper may reach members of the public who would not normally access electronic updates.</i>
✓ <i>Data to inform the PNA was obtained from a wide range of sources.</i>
✓ <i>A gap analysis was undertaken to look at how pharmaceutical services might be improved in Herefordshire.</i>
✓ <i>NWCSU produced a draft version of the PNA during November and December</i>
✓ <i>Virtual approval by HWB from 5<sup>th</sup> January</i>
✓ <i>Draft PNA to be approved by HWB on 13<sup>th</sup> January 2015 for consultation</i>
✓ <i>Formal public consultation (minimum of 60 days) will run from 19<sup>th</sup> January 2015 to 20<sup>th</sup> March 2015</i>
✓ <i>An full analysis of responses to the formal consultation is to be carried out end of March 2015</i>
✓ <i>Final draft PNA to be prepared in April 2015</i>
✓ <i>Final approval by HWB at 12<sup>th</sup> May 2015 meeting</i>
✓ <i>Publication thereafter between 12<sup>th</sup> to 31<sup>st</sup> May 2015</i>

### **Key issues for Herefordshire's HWB to consider:**

NWCSU will produce the initial draft for 5<sup>th</sup> January 2015 and share it with HWB members by email or if necessary in hard copy. HWB members will then have until 13<sup>th</sup> January to provide comments and confirm approval at HWB meeting. Authority to approve the consultation version with any necessary amendments will be **delegated to the Cabinet Member for Health and Wellbeing**. This consultation version will be made available and notified to the statutory consultees on 19<sup>th</sup> January 2015.

The Health and Social Care Act 2012 transferred responsibility to develop and update Pharmaceutical Needs Assessments (PNA) from PCTs to HWBs. HWB's first PNA must be published by 1 April 2015.

***IMPORTANT NOTE: Herefordshire County Council have been fully informed by NWCSU that the timescale agreed within this statement of work will be in breach of NHS No.349 2013: Part 2: Regulation 5. 'Each HWB must publish its first pharmaceutical needs assessment by 1<sup>st</sup> April 2015.'***

***Herefordshire County Council understands that there will be a short period of time where there will be an absence of a new and updated PNA, to the timescales designated in regulations above. There is a risk that this could lead to legal challenges against health and care commissioning bodies responsible for the Herefordshire geography, due to the PNA's relevance to decisions about commissioning pharmaceutical services, dispensing doctor services and new pharmacy openings.***

***Herefordshire County Council will take full accountability for this publication delay and be responsible for any necessary communication, actions and potential external challenge which may arise by the absence of a PNA. NWCSU would provide advice and support should this occur.***