



Although a formal committee of the city council, the Health & Wellbeing Board has a remit which includes matters relating to the Clinical Commissioning Group (CCG), the Local Safeguarding Board for Children and Health Watch. Papers come from a variety of sources. The format for Health & Wellbeing Board papers is consequently different from papers submitted to the city council for exclusive city council business.

1. Formal details of the paper

- 1.1. Title of the paper
Pharmaceutical Needs Assessment – Supplementary Statement and Working Draft of PNA report conclusions and recommendations
- 1.2 Who can see this paper?
All
- 1.3 Date of Health & Wellbeing Board meeting
14/10/2014
- 1.4 Author of the Paper and contact details
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2. Decisions, recommendations and any options

2.1 This paper presents an updated supplementary statement to the 2010 Pharmaceutical Needs Assessment (PNA), for approval by the Health and Wellbeing Board (HWB).

2.2 The paper also presents a working draft of conclusions and recommendations of the ongoing 2015 PNA for discussion as requested by the HWB at the meeting on 05/02/2014. The PNA Steering Group will approve the draft of the PNA report prior to a 60-day consultation period, as agreed at the HWB meeting 5th February 2014. The final draft PNA document will be presented to the HWB in March 2015 for approval.

3. Relevant information

3.1 Context / background information

3.1 The Pharmaceutical Needs Assessment (PNA) is a comprehensive statement of the need for pharmaceutical services of the population in its area. The National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 (“the Regulations”) set out the legislative basis and requirements of the Health and Wellbeing Board for developing and updating the PNA as well as the responsibility of NHS England in relation to “market entry”.

3.1.2 The provision of NHS Pharmaceutical Services is a controlled market. If someone (a pharmacist, a dispenser of appliances, or in some circumstances and normally in rural areas, a GP) wants to provide NHS pharmaceutical services, they are required to apply to NHS England to be included on a pharmaceutical list. Since April 2013 pharmaceutical lists are compiled and held by NHS England. This is commonly known as the NHS “market entry” system.

3.1.3 Under the Regulations, applications for inclusion on a pharmaceutical list must prove that they are able to meet a pharmaceutical need as set out in the relevant PNA. There are two exceptions, one for services provided by distance selling (e.g. internet pharmacies), and the second is an application for needs not foreseen in the PNA.

3.1.4 NHS England will use the PNA when making decisions on applications. Such decisions are appealable and decisions made on appeal can be challenged through the courts.

3.1.5 NHS England must maintain up to date lists of persons within an area offering a pharmaceutical service. NHS England must consult, giving 45 days for a response, the relevant Health and Wellbeing Board when an application for a new pharmacy or change to an existing pharmacy is received within 2km of the area served by a Health and Wellbeing Board.

3.1.6 The requirements of the Health and Wellbeing Board are as follows:

3.1.6.1 HWBs are required to produce **the first PNA by 1 April 2015**. The Regulations set out the minimum information which must be included in the PNA, matters that must be considered when making the assessment and the process to be followed (including a statutory 60 day consultation period). In the interim period the Regulations make provision for use of the PNA published by the HWBs former PCT(s) to inform market entry decisions.

3.1.6.2 HWBs are required to publish a revised assessment within **three years** of publication of their first assessment; and

3.1.6.3 HWBs are required to publish a revised assessment as soon as is reasonably practical after identifying significant changes to the availability of pharmaceutical services since the publication of its PNA unless it is satisfied that making a revised assessment would be a disproportionate response to those changes whereby a supplementary statement could be published. In addition the Health and Wellbeing Board is required to maintain an up to date map of provision of NHS Pharmaceutical Services.

3.1.7 The current position regarding the PNA is described below:

3.1.7.1 A PNA for Brighton and Hove was published by NHS Brighton and Hove in February 2011. A copy of the PNA can be found on the Brighton and Hove Connected website at <http://www.bhconnected.org.uk/content/needs-assessments>

3.1.7.2 In March 2013 the PCT Pharmaceutical Committee reviewed the 2011 PNA and published a Supplementary Statement which states that a revised PNA was not required at that point (and would be a disproportionate response). A copy of the Supplementary Statement is available at: <http://www.bhconnected.org.uk/content/needs-assessments>

A further supplementary statement, accurate as at 1st July 2014, is presented here (Section 5) for approval by the HWB.

3.1.8 The HWB has instructed the Director of Public Health to produce a draft PNA for approval by the HWB by 1st April 2015. The Director of Public Health established a PNA steering group in March 2014 to oversee this process. The steering group is chaired by a Consultant in Public Health. Membership of the group includes representatives of BHCC Public Health Directorate, East Sussex Local Pharmaceutical Committee, Local Medical Committee, NHS England, Brighton and Hove Clinical Commissioning Group and Healthwatch.

3.1.9 A revised draft PNA will be circulated to the HWB as part of the statutory consultation. A final version will be presented to the HWB for approval by 1 April 2015. **A working draft of the draft PNA conclusions and recommendations is presented here to the HWB as requested by the HWB 5th February 2014.**

3.1.10 The completion of the PNA is expected to adhere to the following timeline:

Key steps	Complete	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
PNA Steering Group Meetings									
HWB PNA Briefing									
Final Approved PNA implementation plan									
Engagement with stakeholders									
Data collection & analyses - current services, health needs and local and national priorities									
Map current service provision									
Identify and prioritise gaps in current service provision against the identified needs and priorities									
First draft of PNA									
Review of PNA 1st draft by Steering Group									
Finalise draft of PNA									
Draft consultation PNA signed off by Steering Group									
Formal consultation									
Analysis and preparation of consultation responses									
Amend PNA in light of consultation									
Finalise PNA for sign off by Steering group and submission to the HWB									
PNA signed off by the HWB 24 th March 2015									
PNA published by 1 st April 2015									

3.2 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

3.2.1 Publication of a PNA is a statutory requirement for the Brighton and Hove Health and Wellbeing Board. The specified option was

approved, as an efficient and effective method to fulfil these duties, by the HWB on 5th February 2014.

3.3 COMMUNITY ENGAGEMENT & CONSULTATION

3.3.1 The Regulations set out the requirements for consultation on PNAs. When making an assessment for the purposes of publishing a Pharmaceutical Needs Assessment, each HWB must consult the following about the contents of the assessment it is making:

- (a) Local Pharmaceutical Committee
- (b) Local Medical Committee
- (c) any persons on the pharmaceutical lists and any dispensing doctors list for its area;
- (d) any Local Pharmaceutical Service chemist in its area with whom the NHS England has made arrangements for the provision of any local pharmaceutical services;
- (e) Healthwatch, and any other patient, consumer or community group in its area which in the opinion of the HWB has an interest in the provision of pharmaceutical services in its area; and
- (f) NHS trusts or NHS foundation trust;
- (g) NHS England and
- (h) neighbouring HWBs

We have consulted all of the above and will again will stakeholders and residents an opportunity to comment on the PNA report during the consultation process.

3.3.2 Engagement that has already taken place during the preparation of the draft PNA includes the following:

- Three surveys with: local patients / the public; local community pharmacies and local GPs and non-medical prescribers
- A focus group with local pharmacists representing different types of pharmacies within the city
- In-depth interviews with members of the public who showed an interest in further engagement following completion of the survey
- Semi-structure interviews with providers of other NHS pharmaceutical services (NHS Trusts, Foundation trusts and independent provider)

3.3.3 There is a minimum period of sixty days for consultation responses. The consultation period for the PNA will be 66 days and take place 1st November 2014 – 9th January 2015.

4. Important considerations and implications

4.1 Legal



The statutory requirement and prescribed process for the HWB to publish a PNA is set out in the body of the overall PNA report. The proposals in the report are consistent with ensuring that the HWB is in a position to discharge its duties.

Lawyer Consulted: Elizabeth Culbert Date: 16/01/14

4.2 Finance

The cost of producing the PNA including public involvement and consultation will be met by the ring-fenced Public Health Grant. There is £20k allocated for the PNA in the 2014/15 Public Health Business Plan for 2014/15.

Finance Officer Consulted: Anne Silley Date: 14/01/14

4.3 Equalities

We have incorporated Equality Act 2010 requirements throughout the PNA document. During the PNA process we have taken into consideration protected characteristics and vulnerable groups at each stage of the process and details relating to how services affect different groups are detailed in the main PNA report.

Equalities Officer Consulted: Sarah Tighe-Ford Date: 25/03/14

4.4 Sustainability

There are details in the PNA report regarding schemes aimed to improve sustainability of pharmacy services, such as the green bag campaign, inhaler recycling and reducing medicines waste.

4.5 Health, social care, children's services and public health

The PNA is a key tool for identifying what is needed at a local level to support the commissioning intentions for pharmaceutical services. This will enable the provision of appropriate health, care and public health services as part of the delivery of local health and social care strategies, including the Health and Wellbeing Strategy and the Better Care work.

5 Supporting documents and information

Attached documents:

- 1) PNA Supplementary Statement, July 2014
- 2) Working draft of conclusions and recommendations of the 2015 PNA