

**Essex Health and Wellbeing Board Pharmaceutical Needs Assessment (PNA) Formal Consultation Report**

Under the NHS Pharmaceutical Services Regulations 2013 regulations, all Health and Wellbeing Boards (HWB's) are required to publish a PNA by 1 October 2022.

The purpose of the PNA is to assess and set out how the provision of pharmaceutical services can meet the current and future health needs of the HWB's population for a period of up to three years.

The document is then used by NHS England as the basis for determining market entry to a pharmaceutical list including the opening of additional pharmacies, relocations and consolidations of premises and amendments to opening hours or pharmaceutical services. It is also used by local commissioning organisations to commission pharmaceutical services.

As part of the NHS Pharmaceutical Services Regulations 2013, the HWB is required to consult a specified range of relevant organisations\* on a draft of the PNA at least once during the process of developing the document.

\*The following organisations must be consulted:

- the local pharmaceutical committee (LPC)
- the local medical committee (LMC)
- pharmacy and dispensing appliance contractors included in the pharmaceutical list for the area of the Essex HWB,
- dispensing doctors included in the dispensing doctor list for the area of the HWB
- any pharmacy contractor that holds a local pharmaceutical services contract with premises that are in the HWB's area
- Healthwatch, and any other patient, consumer, or community group in the area which the HWB believes has an interest in the provision of pharmaceutical services
- any NHS trust or NHS foundation trust in the HWB's area
- NHS England and NHS Improvement (NHSE)
- any neighbouring HWB, and
- Integrated Care Boards and Integrated Care Systems for the HWB area.

The consultation was open on Citizen Space, Essex County Council's consultation portal, from 30th May 2022 to 5th August 2022.

There were 56 responses to the consultation on the portal. Not all responders answered all questions and some questions were only directed at certain organisations. Other organisations who responded are Essex LPC, Essex LMC, NHSE, neighbouring HWBs and individual contractors.

Additionally 6 emails and various documents were received as part of the consultation process. The themes from these responses have been collated and analysed and are included in this report.

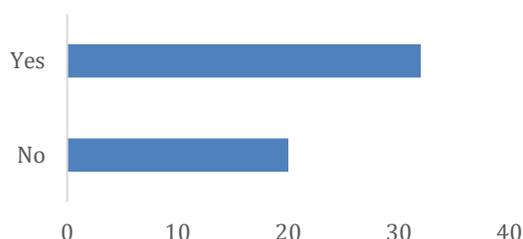
**A further section is provided at the end of this report as a FAQ to support understanding of the scope of the PNA.**

**1: Name of organisation responding (optional):**

There were 35 responses to this part of the question.

**2: This document sets out the draft results of the PNA for the Essex HWB – do you feel it achieves this?**

There were 52 responses to this part of the question (with N = 4 ‘not answered’), of which the following responded ‘yes’ or ‘no’:



Option	Total	Percent
Yes	32	61.54%
No	20	38.46%

**This document sets out the draft results of the PNA for the Essex HWB – does it achieve this? Comments**

There were 26 responses to this part of the question, additional comments received separately have been collated below.

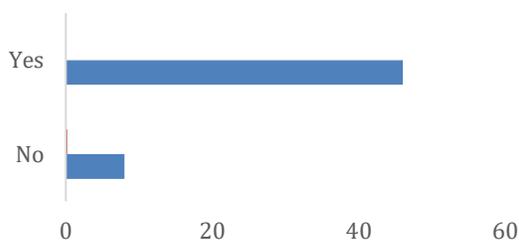
Theme	Response
Covers a lot of demographic data and provides insight	Noted
Distance from nearest pharmacy, travel times and methods of travel, environmental concerns about driving	The PNA is required to analyse times to reach pharmaceutical services. This has been done using driving, public transport and walking at various times of the day and on various days. A full travel times report is provided as part of the PNA. Environmental and climate comments are out of scope of this current assessment.
Complaints about a local pharmacy including opening hours, services, medication shortages and staffing	Complaints about any pharmacy should be address to the pharmacy itself and escalated to NHSE if required at <a href="mailto:england.contactus@nhs.net">england.contactus@nhs.net</a>
Parking and cost of travel	This is out of scope of this assessment

Local terrain	Local terrain has been considered in travel analysis. Specific comments about a hill have been addressed by an NHS Appeal hearing and not considered to be relevant.
Access for disabled residents	Pharmacies have to provide reasonable adjustments for all residents under the Equality Act.
New housing and population growth	This has been considered over the lifetime of this assessment
Pharmacy within airport perimeter	Independence Direct, Coopers End Road, Stansted is a dispensing appliance contractor (DAC) on the NHSE pharmaceutical list. DACs have to be included in the PNA assessment as they provide pharmaceutical services. The pharmacy within Stansted airport for departing passengers has not been assessed as it is not on the NHSE list of contractors in the Essex HWB area.
Very detailed, very informative. Current service provision clearly set out and future needs assessed based on wide ranging data included in the PNA.	Noted
Residents of Burton End	Burton End residents have access to a pharmacy within the travel time analysis. They similarly also have to travel for other amenities. Some parts of Uttlesford are rural and residents within controlled localities have access to dispensing doctors if they meet the criteria.
Request for a second pharmacy	The PNA has not identified any gaps in provision. Awarding pharmaceutical contracts is not the responsibility of the HWB. A pharmaceutical contract has to be applied for to NHSE under the current NHS Market Entry conditions.
Data analysis	The data sets used are those used by ECC for all demographic analysis. Further data is available and referenced within the PNA
Patient survey data and methodology	The patient survey was not a requirement of the PNA process. It was voluntarily undertaken. The patient survey report is provided separately.
Inclusion of a private pharmacy into the PNA	Private pharmacies are not in scope under the regulations for producing a PNA.
A comprehensive overview of the integral parts of the PNA for Essex is given in particular the requirement for a three yearly assessment as required by the NHS Pharmaceutical Regulations 2013. With this policy background the draft report is relatively easy to follow and understand including the summary conclusions.	Noted
Essex HWB offering dispensing license to a pharmacy	The HWB has not offered any contracts to any pharmacy. This is not within its remit. Pharmaceutical contracts are awarded by NHSE as per Market Entry requirements at the time.
Communication about the consultation and stakeholders	Stakeholders for the PNA are identified in the regulatory guidance. Communication about the consultation was undertaken in line with regulatory requirements.
Too long and difficult to find one particular section	The document is a statutory one and has to contain information required in the regulations to allow NHSE and commissioners to make informed decisions.

### 3: Do you feel that the purpose of the PNA has been explained sufficiently?

There were 54 responses to this part of the question (with N = 2 'not answered'), of which the following responded 'yes' or 'no':

Additional comments received separately have been collated below.



Option	Total	Percent
Yes	46	85.19%
No	8	14.81%

### Do you feel that the purpose of the PNA has been explained sufficiently?

#### Comments

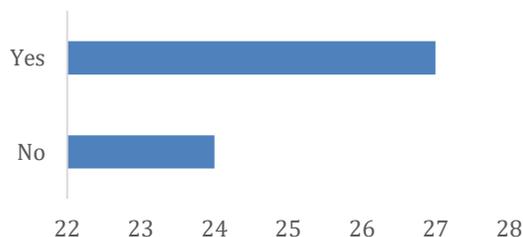
There were 17 responses to this part of the question, additional comments received separately have been collated below.

Theme	Response
The information is correctly labelled and headed and contains useful information, hard to fully take on board all of the information, it does a decent job of explaining.	Noted
Section 1.7 (PNA review process) – It should be made clearer that the PNA may be refreshed sooner than 3 years if a gap in service becomes apparent (i.e. a pharmacy closes that analysis indicates presents a gap).	Noted and clarified in the final PNA document.
Yes, but it is not sufficiently clear if the PNA can make recommendations for another licensed pharmacy in in locality such as Stansted Mountfitchet.	No gaps have been identified.
Mistakes and contradictions are contained within the draft PNA	The consultation has provided an opportunity for these to be highlighted.
Broad analysis, not detailed enough at local level	The content and analysis are in line with the guidance set in the regulations.
Over explained, focus should be clear	The content and analysis are in line with the guidance set in the regulations.
Population growth not considered	Population growth over the lifetime of this assessment has been considered.

The purpose of the PNA has been explained sufficiently in line with the relevant regulations.	Noted.
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#### 4: Do you feel the information contained within the PNA adequately reflects the current community pharmaceutical services provision within the Essex HWB?

There were 51 responses to this part of the question, (with N = 5 'not answered'), of which the following responded 'yes' or 'no':



Option	Total	Percent
Yes	27	52.94%
No	24	47.06%

#### Do you feel the information contained within the PNA adequately reflects the current community pharmaceutical services provision within the Essex HWB? Comments

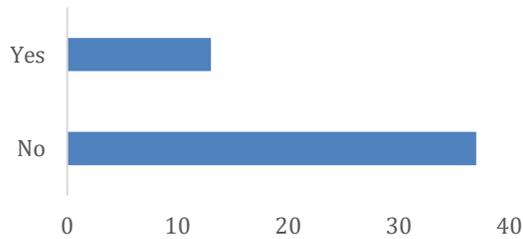
There were 29 responses to this part of the question, additional comments received separately have been collated below.

Theme	Response
Opening hours are incorrect	The consultation has provided an opportunity to correct any errors.
Disabled access to a pharmacy is poor	Pharmacies have to provide reasonable adjustments for all residents under the Equality Act.
Some data may be out of date by now	Noted, all data is referenced and was collected at a point in time.
Looks as it includes full pharmaceutical lists and services	Noted.
Travel times	The PNA is required to analyse times to reach pharmaceutical services. This has been done using driving, public transport and walking at various times of the day and on various days. A full travel times report is provided as part of the PNA.
Airport pharmacy	Independence Direct, Coopers End Road, Stansted is a dispensing appliance contractor (DAC) on the NHSE pharmaceutical list. DACs have to be included in the PNA assessment as they provide pharmaceutical services.

	The pharmacy within Stansted airport for departing passengers has not been assessed as it is not on the NHSE list of contractors in the Essex HWB area.
Only 8 pharmacies in Uttlesford, rurality	Uttlesford has 8 community pharmacies, 1 dispensing appliance contractor and 8 dispensing doctors providing pharmaceutical services. This reflects the rural nature of the area.
Population growth Stansted and Great Hallingbury The current state of GP services, increasingly pressure in future on pharmacy. Workforce planning for pharmaceutical services. This issue will require close liaison with the Department of Health to ensure adequate pharmaceutical service provision for patients in both primary and secondary care.	Noted. Population and housing growth within the 3-year lifetime of the PNA have been considered. Other points are to note for NHSE and commissioners.
Carbon footprint	Out of scope of the current PNA.
Reflects current provision, not needed provision	Analysis has been carried out in line with guidance on the regulations.
Complaints about a pharmacy	Complaints about any pharmacy should be address to the pharmacy itself and escalated to NHSE if required at <a href="mailto:england.contactus@nhs.net">england.contactus@nhs.net</a>
Private pharmacy	Out of scope of the PNA.
Burtons End residents	Burton End residents have access to a pharmacy within the travel time analysis. They similarly also have to travel for other amenities. Some parts of Uttlesford are rural and residents within controlled localities have access to dispensing doctors if they meet the criteria.
Sunday hours incorrectly identified	Checked and amended.
Provision in Great Dunmow	Pharmaceutical provision in areas under previous market entry regulations is out of scope of this PNA.
Can only comment on local area, not whole PNA	Noted.
The PNA reflects the current provision at the time of drafting. Consideration may need to be given to changes in provision throughout the life of the PNA.	Noted. The PNA covers a 3-year period, it will be kept under regular review during this period.
The challenges and problems are not identified.	The consultation has provided an opportunity to highlight any information that has not been considered.
North Weald Pharmacy service correction	Noted and amended.

## 5: Are there any pharmaceutical services currently provided that you are aware of that are not included within the PNA?

There were 50 responses to this part of the question (with N = 6 'not answered'), of which the following responded 'yes' or 'no':



Option	Total	Percent
Yes	13	26.00%
No	37	74.00%

**Are there any pharmaceutical services currently provided that you are aware of that are not included within the PNA? Comments**

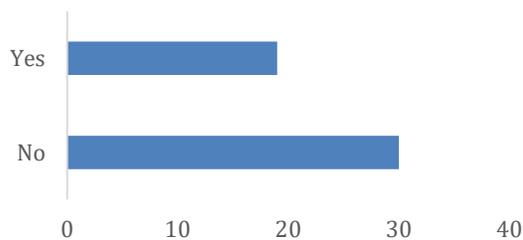
There were 21 responses to this part of the question. additional comments received separately have been collated below.

Only responses mentioning pharmaceutical services as identified in the regulations have been considered.

Theme	Response
Dossett boxes provision	Provision of Dossett boxes is not a commissioned pharmaceutical service.
Private pharmacy provision	Not in scope of the PNA.
Contraception pilot service	Pilot services have not been considered whilst developing the current PNA.
Sexual Health services	Sexual health services commissioned from community pharmacies have been identified and captured in the PNA.

**6: With reference to Essential, Advanced and Locally Enhanced Services, are there any gaps and commissioning recommendations incorrectly identified?**

There were 49 responses to this part of the question (with N = 7 'not answered'), of which the following responded 'yes' or 'no':



Option	Total	Percent
Yes	19	38.78%

No	30	61.22%
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**With reference to Essential, Advanced and Locally Enhanced Services, are there any gaps and commissioning recommendations incorrectly identified? Comments**

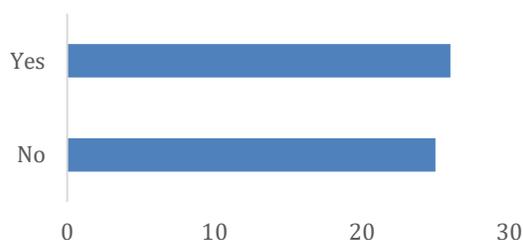
There were 27 responses to this part of the question. additional comments received separately have been collated below.

Only comments with reference to Essential, Advanced and Locally Enhanced Services, gaps and commissioning recommendations have been considered.

Theme	Response
Some of the other services that are not provided in Essex could be worth adding to the portfolio, especially as some of the current services are not being used nor being distributed among all the pharmacies, i.e. is the stop smoking service, only one pharmacy per zone has the contract and could patients benefit from having the likes of the INR readings done at Pharmacy level?	Noted, for commissioners to consider.
Palliative care service	This is commissioned by local CCGs at the time of writing the PNA.
Smoking cessation provision in pharmacies has been reduced	Noted, for commissioners to consider.
Some services provided are inaccurately identified, perhaps due to date of data capture	Noted, any inaccuracies identified during the consultation have been corrected. All data is referenced and was collected at a point in time.
Census data used is old	Latest available datasets have been used.
Granting a license to a pharmacy	Out of scope of the PNA. The HWB does not grant pharmaceutical contracts.

**7: Do you know of any relevant information not included which could affect the conclusions in the document?**

There were 51 responses to this part of the question (with N = 5 'not answered'), of which the following responded 'yes' or 'no':



Option	Total	Percent
Yes	26	50.98%
No	25	49.02%

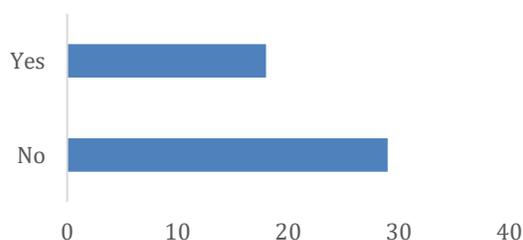
**Do you know of any relevant information not included which could affect the conclusions in the document? Comments**

There were 29 responses to this part of the question. additional comments received separately have been collated below.

Theme	Response
Public Health campaign promotions and working in partnership to maximise outcomes	Notes, for commissioners to consider.
Population growth	Population growth within the 3-year lifetime of the PNA have been considered.
Private pharmacy omitted from PNA	Out of scope of the PNA.
Disabled access to a pharmacy	Pharmacies have to provide reasonable adjustments for all residents under the Equality Act.
PhAS list is now available	Noted and added to the final PNA.
Figures for online pharmacies missing	These are available and change regularly. Up to date numbers are available on the NHSBSA site
Other methods of transport apart from driving should be considered	These have been considered in the full travel time analysis report in the PNA Appendix.
C Percy Limited provides: Flu Vaccination, Covid vaccination, CPCS	Noted and amended.
West Bergholt Pharmacy provides: NMS, CPCS, Covid vaccination	Noted and amended.
Springfield Pharmacy provides: NMS, CPCS, Hypertension	Noted and amended.
North Weald Chemist DOES provide the Community Pharmacist Consultation Service (CPCS).	Noted and amended.

**8: Is there any additional information that you feel should be included?**

There were 47 responses to this part of the question (with N = 9 'not answered'), of which the following responded 'yes' or 'no':



Option	Total	Percent
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<b>Yes</b>	18	38.30%
<b>No</b>	29	61.70%

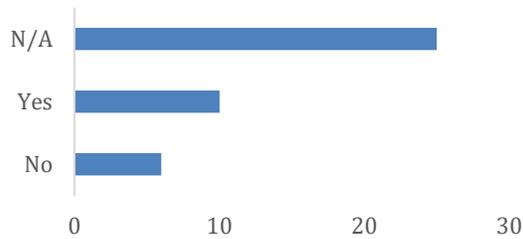
**Please provide any comments**

There were 24 responses to this part of the question. additional comments received separately have been collated below.

Theme	Response
Private pharmacy	Not in scope of the PNA
Availability of full housing development plans	Full housing plans can be accessed from local councils.
Parking	Not in scope of the PNA
Complaints	Complaints about any pharmacy should be address to the pharmacy itself and escalated to NHSE if required at <a href="mailto:england.contactus@nhs.net">england.contactus@nhs.net</a>
Population growth	Population growth within the 3-year lifetime of the PNA have been considered.
Rurality	The NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013, allow doctors to dispense to eligible patients in certain circumstances. In summary: <ul style="list-style-type: none"> <li>• Patients must live in a ‘controlled locality’ (an area which has been determined by NHSE&amp;I or a preceding organisation as rural in character), more than 1.6km (measured in a straight line) from a pharmacy (excluding distance selling premises) and</li> <li>• Their practice must have premises approval and consent to dispense to that area</li> </ul>
PhAS list	Noted and added to the final PNA.
Why a pharmacy is not deemed to meet the requirements for a dispensing Chemist.	This is beyond the scope of the PNA. The HWB does not determine whether a pharmacy meets NHS requirements.
Pharmacies not open to the community	Appliance contractors are pharmaceutical service providers and required by the NHS regulations to be identified in the PNA for each HWBB.
Comparison of provision in other areas	Some pharmaceutical services provision was established under previous market entry regulations for pharmaceutical services. This PNA looks at current regulations.

**9: \*NHS England only\* Has the PNA provided adequate information to inform Market entry decisions?**

There were 41 responses to this part of the question (with N = 15 ‘not answered’), of which the following responded ‘yes’, ‘no’ or ‘not applicable’:



Option	Total	Percent
Yes	10	24.39%
No	6	14.63%
N/A	25	60.98%

**NHSE ONLY- Has the PNA provided adequate information to inform Market entry decisions? Comments**

There were 8 responses to this part of the question.

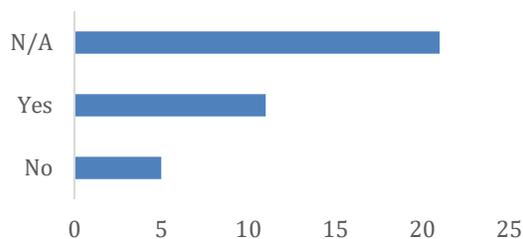
This question was marked for “NHSE only”. Therefore, the only response considered is that of NHSE as the HWB has a statutory duty to provide a PNA that meets the needs of NHSE.

The NHSE response was that the PNA does provide adequate information to inform Market Entry decisions.

**10: \*All commissioners\***

**Has the PNA provided adequate information to inform how you may commission pharmaceutical services in the future?**

There were 37 responses to this part of the question (with N = 19 ‘not answered’), of which the following responded ‘yes’, ‘no’ or ‘not applicable’:



Option	Total	Percent
Yes	11	29.73%
No	5	13.51%
N/A	21	56.76%

**All commissioners- Has the PNA provided adequate information to inform how you may commission pharmaceutical services in the future? Comments**

There were 3 responses to this part of the question.

This question was marked for “All commissioners”. Therefore, the only responses considered are those of commissioners as the HWB has a statutory duty to provide a PNA that meets the needs of commissioners.

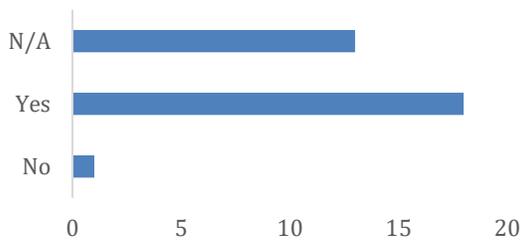
No responses were received from commissioners.

### 11: \*Community pharmacies, Dispensing Appliance Contractors, Distance Selling Pharmacies and Dispensing Doctors ONLY\*

#### Has the PNA correctly reflected the following information about you?

#### Has the PNA correctly reflected the following information about you? - Name

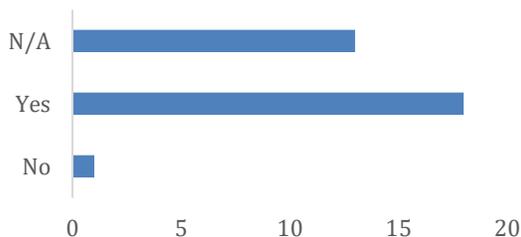
There were 32 responses to this part of the question (with N = 24 ‘not answered’), of which the following responded ‘yes’, ‘no’ or ‘not applicable’:



Option	Total	Percent
Yes	18	56.25%
No	1	3.13%
N/A	13	40.63%

#### Has the PNA correctly reflected the following information about you? - Address

There were 32 responses to this part of the question (with N = 24 ‘not answered’), of which the following responded ‘yes’, ‘no’ or ‘not applicable’:

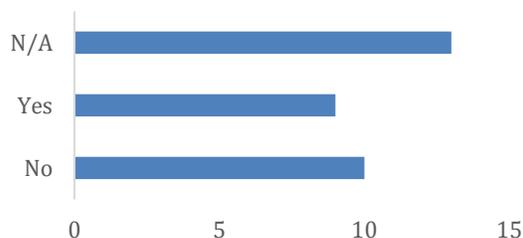


Option	Total	Percent
Yes	18	56.25%
No	1	3.13%

N/A	13	40.63%
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**Has the PNA correctly reflected the following information about you? - Service provision**

There were 32 responses to this part of the question (with N = 24 'not answered'), of which the following responded 'yes', 'no' or 'not applicable':



Option	Total	Percent
Yes	9	28.13%
No	10	31.25%
N/A	13	40.63%

**Has the PNA correctly reflected the following information about you? Comments**

There were 12 responses to this part of the question.

Only comments from contractors have been considered as this was an opportunity for any factual inaccuracies in data captured about services provided by them.

Responses	Comments
We do CPCS and Sexual Health at Allcures Whitmore way (FWL99) Hypertension to follow in the Summer.	Noted and amended. Services not being delivered at the time of writing cannot be captured in the PNA.
Noak Bridge Pharmacy: Opening Times and supplementary hours for our pharmacy are inaccurate and should be as follows: CORE hours Supplementary Hrs Mon, Tue, Wed, Friday : 09:00 - 13:00 14:00- 18:30 18:30 - 18:45 Thu : 09:00 - 13:00 ----- Sat : 09:00 - 11:00 11:00 - 13:00 Sun CLOSED The pharmacy is closed at lunchtime 13:00- 14:00	Noted and amended.
FG175: Services provided- CPCS, Flu vaccination, Covid Vaccination	Noted and amended.

Glennon Chemist: We also provide SAC. In the process of completing the ncsct online training and e-assessment. Once that is done, we will sign up to the SCS.	Noted and amended. Services not being delivered at the time of writing cannot be captured in the PNA.
Boreham Pharmacy, CM3 3DX - does not provide smoking cessation service anymore (withdrawn by provide). CPCS is provided.	Noted and amended.
Theydon Bois Pharmacy <ul style="list-style-type: none"> <li>• Our ODS code is mentioned incorrectly. It is FDE36 and NOT FX480 (which is the old one).</li> <li>• We are doing Flu Vaccinations and that is not ticked on this.</li> <li>• Please advise on SAC services which hasn't been ticked.</li> </ul>	Noted and amended.
Asvacare Pharmacy- Provide smoking cessation as a service through Provide	Noted and amended.
West Bergholt Pharmacy provide: NMS, CPCS, Covid vaccination	Noted and amended.
Springfield Pharmacy provide: NMS, CPCS, Hypertension	Noted and amended.
North Weald Chemist provides the Community Pharmacist Consultation Service (CPCS).	Noted and amended.

## 12: Do you have any other comments about the PNA?

### Further Comments

There were 23 responses to this part of the question. additional comments received separately have been collated below.

Themes and comments	
Too much information, too large a document, too many questions	The NHS regulations stipulate the information that must be included in a PNA. The document is intended for use by NHSE and commissioners of services.
Not thorough enough	The NHS regulations stipulate the information that must be included in a PNA. The document is intended for use by NHSE and commissioners of services.
Private pharmacy	Out of scope.
Clarity on travel time in Mersea	Noted and clarified.
Complaints about a pharmacy	Complaints about any pharmacy should be address to the pharmacy itself and escalated to NHSE if required at <a href="mailto:england.contactus@nhs.net">england.contactus@nhs.net</a>
Request to see responses from another organisations.	Participants did not have to give details of who they were responding on behalf of if they did not want to.
From 1 July, NHS England and NHS Improvement (NHSEI) will now only be known as NHS England (NHSE).	Noted and amended.

Page 17 - there is a reference to NHS England Area Team. This is incorrect and should say Regional team.	
Use of google maps	SHAPE maps were used as the recommended tool.
Travel times from Burton End	Burton End residents have access to a pharmacy within the travel time analysis. They similarly also have to travel for other amenities.
Case for a second Dispensing Pharmacy in Stansted Mountfitchet. Timing of public consultation over the last Christmas period.	NHSE has considered applications for a second NHS contracted pharmacy in the area a number of times. The applications have been refused and upheld on appeal by NHS Resolution. The public survey is not a requirement in the regulations for developing a PNA. The dates of the voluntarily conducted survey were 22/12/2021 to 24/01/2022.

## Additional information

### Background and Regulations

Section 128A of the National Health Service Act 2006 (NHS Act 2006) requires each health and wellbeing board (HWB) to assess the need for pharmaceutical services in its area and to publish a statement of its assessment.

Termed a 'pharmaceutical needs assessment', the NHS (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013, as amended (the 2013 regulations)<sup>1</sup> set out the minimum information that must be contained within a pharmaceutical needs assessment (PNA) and outline the process that must be followed in its development.

In summary they:

- define what is meant by pharmaceutical services (regulation 3),
- set out the minimum information requirements for a pharmaceutical needs assessment (regulation 4 and Schedule 1),
- confirm when the next pharmaceutical needs assessment is to be published, or where a new health and wellbeing board comes into being when it is required to publish its first pharmaceutical needs assessment (regulations 5 and 6),
- set out the circumstances where a health and wellbeing board may need to produce a new pharmaceutical needs assessment sooner than the usual three yearly cycle, or when a supplementary statement may/must be published (regulation 6),
- set out the minimum consultation process that each health and wellbeing board is required to undertake during the development of its pharmaceutical needs assessment (regulation 8), and

<sup>1</sup> NHS (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013, as amended (the 2013 regulations)

- set out specific matters that the health and wellbeing board must consider when drafting its pharmaceutical needs assessment (regulation 9).

### **Wider context**

The preparation and consultation on the pharmaceutical needs assessment should take account of the joint strategic needs assessments and other relevant strategies in order to prevent duplication of work and multiple consultations with health groups, patients and the public.

### **Local context**

The PNA will be used by NHSE (or other body as identified in the regulations) when considering decisions on applications to open new pharmacies and dispensing appliance contractor premises; or applications from current pharmaceutical providers to change their existing regulatory requirements.

Decisions on whether to open new pharmacies are not made by the HWBs.

Under the Regulations, 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 a pharmaceutical need as set out in the relevant PNA (see section on market entry below).

The PNA will also aid the HWB to work with providers to target locally commissioned services to the areas where they are needed and limit duplication of services in areas where provision is adequate.

The PNA will further inform interested parties of the pharmaceutical needs in Essex and enable work to plan, develop and deliver pharmaceutical services for the population.

It will inform commissioning decisions by local commissioning bodies including local authorities.

### **NHS Market entry process**

If a person or corporate body wants to provide pharmaceutical services, they are required to apply to the NHS to be included in a pharmaceutical list. Pharmaceutical lists are compiled and held by NHS England. This is commonly known as the NHS “market entry” system.

Previous tests for inclusion onto the pharmaceutical list were not based on needs assessments. Existing pharmaceutical provision includes historical market entry and should not be used to assess current need.

The current regulations are the only guidance that can be referred to whilst developing the PNA, these include regulations for considering consolidations to reduce the number of pharmacies.

Petitions and requests by a community cannot bypass this Market entry process.

## Scope

The services that a pharmaceutical needs assessment must include are defined within both the National Health Service Act 2006 and the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013, as amended.

Pharmaceutical services is a collective term for a range of services commissioned by NHSE.

In relation to pharmaceutical needs assessments, it includes:

- Essential, advanced and enhanced services provided by pharmacies (including distance selling or online pharmacies)
- Essential and advanced services provided by dispensing appliance contractors
- The dispensing service provided by some gp practices and
- Services provided under a local pharmaceutical services contract that are the equivalent of essential, advanced and enhanced services.

Pharmaceutical services may be provided by:

- A pharmacy contractor who is included in the pharmaceutical list for the area of the HWB
- A pharmacy contractor who is included in the Local Pharmaceutical Services list for the area of the HWB
- A dispensing appliance contractor who is included in the pharmaceutical list held for the area of the HWB and
- A doctor or GP practice that is included in the dispensing doctor list held for the area of the HWB

NHSE is responsible for preparing, maintaining and publishing lists of contracted providers.

The PNA has a regulatory purpose that sets the scope of the assessment.

Pharmaceutical services are evident in other areas of work but are excluded from this assessment. These include prison pharmacy, secondary care and private pharmacy services where patients may be obtaining a type of pharmaceutical service that is not covered by this assessment.

## The PNA development process

The next Essex HWB PNA is due to be published by 1st October 2022.

The process for developing the PNA is informed by the regulations and guidance provided by DHSC<sup>2</sup>

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<sup>2</sup> DHSC Pharmaceutical needs assessments Information pack for local authority health and wellbeing boards Published October 2021

There is a steering group overseeing the assessment. The steering group (as recommended in the guidance pack) has representation from:

- the Essex County Council public health team,
- the Essex County Council communications and engagement team,
- the local pharmaceutical committee (LPC),
- the local medical committee (LMC),
- Healthwatch,
- NHS England (NHSE),
- the clinical commissioning groups (CCG) and
- the integrated care system.

The HWB area was broken down into localities for analysis using available data. The district and borough councils were agreed as the localities for the Essex HWB PNA.

The following were used to inform the assessment:

- Analysis of pharmaceutical services provided by the 257 pharmacies, 46 dispensing doctors and 5 dispensing appliance contractors in the Essex HWB area (sources- NHSE, CCGs, NHSBSA and commissioners).
- Opening hours of the pharmaceutical providers (source- NHSE).
- Mapping of locations of the pharmaceutical providers (source- SHAPE maps).
- Travel time analysis to pharmaceutical provision using a car, public transport and walking at various times of the day. 20 minutes' drive time is a national measure being used in PNAs across the country.
- Access to neighbouring locality pharmaceutical provision and Distance Selling Pharmacies.
- Public survey (not required in the regulations but undertaken using the questions recommended in the PNA guidance pack).
- Contractor questionnaire (conducted at the same time as the public survey).
- Statutory stakeholder consultation (minimum 60 days required by the regulations).
- JSNA data on Essex population and life expectancy.
- The Index of Multiple Deprivation and deprivation ranges as well as the other wider determinants of health.
- The general lifestyle including smoking and drug and alcohol misuse.
- The disease burden.
- Predicted housing growth.
- Provision from neighbouring HWB's.
- Analysis of dispensing locations (dispensing flows).
- Local and national strategies.

## **Consultation**

### **Patient survey**

A voluntary patient survey to assess levels of satisfaction with existing pharmaceutical services across the county was undertaken. Dates for the survey were 24<sup>th</sup> December 2021 and 31<sup>st</sup> January 2022

Questions recommended in the DHSC PNA information pack were included.

The survey was promoted by ECC communications and all partner organisations.

The public were informed by Healthwatch, all community pharmacies and GP surgeries.

The timelines of this survey were moved due to representations made by a parish council about proposed dates for the statutory consultation.

### Statutory consultation

Regulation 8 requires the HWB to consult a specified range of organisations on a draft of the pharmaceutical needs assessment at least once during the process of drafting the document.

They must be given a minimum period of 60 days to submit their response.

A statutory 60-day consultation on the draft Essex HWB PNA was undertaken from 30 May 2022 to 5 August 2022.

The regulations stipulate the organisations must be consulted.

The statutory consultation was promoted by ECC communications, and all partner organisations stated in the regulations were notified.

56 responses were received via the consultation portal. 50 of the 56 responses were about provision in the Stansted Mountfitchet area.

Various other email representations have also been received as part of the consultation and have been included in the analysis in this report.

This consultation report will be included in the final PNA.

### **Access for disabled patients**

Pharmacy premises are required to make “reasonable adjustments” to make services accessible. These are not enforceable by NHSE.

### **Complaints about a pharmacy**

Complaints about the services provided by a pharmacy should be addressed in the first place to the Pharmacy itself.

These can further be escalated to NHSE at [england.contactus@nhs.net](mailto:england.contactus@nhs.net)

### **Opening hours and workforce.**

The core contract for each pharmaceutical contractor must be met, complaints can be made as stated above if these are met. The covid-19 pandemic and workforce issues

are widely acknowledged and have led to pharmacies across the country having to reduce hours. This is done in conversations with NHSE as the contract holders.

### Delivery services and Dossett boxes

These are not NHS pharmaceutical services.

Pharmacies are not required to provide these services as they are not commissioned.

(During the Covid-19 pandemic there was a brief period during which NHSE commissioned a delivery service. This was not an essential service and not all pharmacies chose to provide it).

### Housing and neighbouring housing in other area PNAs

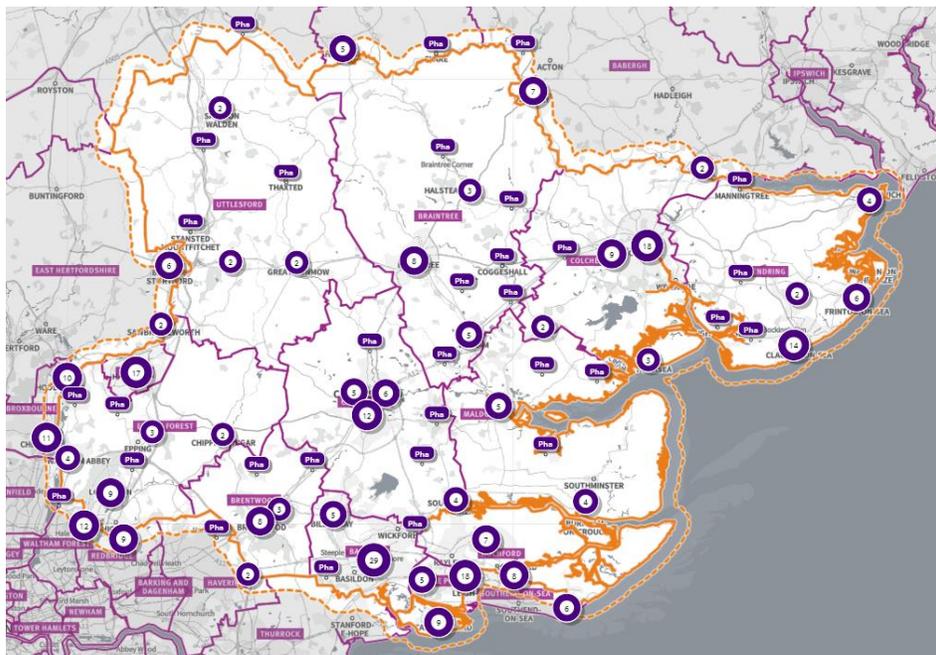
Housing developments across Essex have been analysed and existing pharmacies in the area and neighbouring areas are identified to be able to cope with any increase in demand over the lifetime of this PNA.

No gaps have been identified in the Essex PNA.

### Cross border use

Whilst patients registered with a surgery may use Essex HWB pharmacies they can also use pharmacies in neighbouring areas and distance selling pharmacies. There is no restriction on which pharmacy an individual chooses to use.

With a 1.6KM (1 mile) buffer zone, there are 347 pharmacies across Essex and within a 1.6KM buffer zone around Essex, as shown on the map below:



Source: Shape maps

Dispensing analysis of prescriptions issued by surgeries shows that patients use a variety of pharmacies nearer to their home, work, whilst travelling or online.

The provision of pharmaceutical services from neighbouring HWB areas is also acknowledged.

### Data

Data not provided in the PNA can be sourced from other datasets available on Open Data or partner organisations. Data used in the draft PNA has been referenced.

### Rurality

Parts of Essex are classed as rural areas and travel times reflect this.

The NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013, allow doctors to dispense to eligible patients in certain circumstances. In summary:

- Patients must live in a 'controlled locality' (an area which has been determined by NHSE&I or a preceding organisation as rural in character), more than 1.6km (measured in a straight line) from a pharmacy (excluding distance selling premises) and
- Their practice must have premises approval and consent to dispense to that area

Residents in rural areas have access to registering with dispensing doctor surgeries if they meet the criteria.

### Choice

The PNA has determined that there is reasonable choice with regard to obtaining pharmaceutical services in the Essex HWB area and no gaps have been identified.

This report has been produced by the Essex County Council Public Health & Public Health Intelligence Team.

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