

AGENDA ITEM

(2.3)

POPULATION HEALTH & PARTNERSHIPS COMMITTEE

PHARMACEUTICAL NEEDS ASSESSMENT (PNA) UPDATE

Date of meeting	(06/10/2021)
FOI Status	Open/Public
If closed please indicate reason	Choose an item.
Prepared by	Brian Hawkins, Deputy CD Medicines Management
Presented by	Julie Denley, Director of Primary Care and Mental Health
Approving Executive Sponsor	Executive Medical Director
Report purpose	FOR NOTING

Engagement (internal/external) undertaken to date (including receipt/consideration at Committee/group)

Committee/Group/Individuals	Date	Outcome
PNA Steering Group	(16/08/2021)	SUPPORTED
Management Board	(21/04/2021)	SUPPORTED
Quality & Safety Committee	(22/09/2021)	SUPPORTED
Health Board	(30/09/2021)	NOTED

ACRONYMS

PNA	Pharmaceutical Needs Assessment
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1. SITUATION/BACKGROUND

- 1.1 Welsh Government has changed the way in which applications from pharmacies, dispensing appliance contractors and dispensing doctors

to provide pharmaceutical services are made and determined by introducing pharmaceutical needs assessments or PNAs.

- 1.2 The NHS (Pharmaceutical Services) (Wales) Regulations 2020, which introduce PNA in Wales, came into force on 1st October 2020 and place a statutory duty on each health board to publish its first PNA by 1st October 2021. As a result Cwm Taf Morgannwg University Health Board (CTMUHB) has begun the process of developing its first PNA.
- 1.3 From 1st October 2021, Health Boards will need to use the published PNA when determining applications from pharmacies, dispensing appliance contractors and dispensing doctors to provide pharmaceutical services under these regulations.
- 1.4 The PNA will:
 - Look at the health needs of CTMUHB's resident population and those who may be temporarily in its area, both now and in the five year lifespan of the PNA;
 - Look at how the provision of pharmaceutical services can meet those health needs;
 - Map the provision of pharmaceutical services within the Health Board's area;
 - Identify the provision of pharmaceutical services outside CTM's area for example elsewhere in Wales and also in England;
 - Identify any gaps in the provision of pharmaceutical services now and in the lifespan of the PNA; and
 - Turn those gaps into current and future needs for pharmaceutical services.
- 1.5 The following services fall within the legal definition of pharmaceutical services:
 - Essential, advanced and enhanced services provided by pharmacies and dispensing appliance contractors, and
 - The dispensing service provided by some GP practices.
- 1.6 In addition, the PNA will also include services provided by other providers for example hospital and prison pharmacies.
- 1.7 Once the PNA is published it will be used by CTMUHB to determine applications from pharmacies and dispensing appliance contractors who wish to open new premises or relocate existing premises. It will also be used to determine outline consent and premises approval applications from dispensing doctors.
- 1.8 The aim of introducing Pharmaceutical Needs Assessments to Wales is to bring about a long term, cost effective and sustainable system

which would afford patients appropriate access to pharmaceutical services. It aims to provide contractors with increased certainty, reducing business risk and allowing them to invest in delivery of wider services. There is an expectation that this will afford more consistent provision of services to a higher standard.

- 1.9 Subsequent PNAs must be published within 5 years as a minimum.

Steering Group

- 1.10 CTMUHB has set up a PNA Steering Group which has overseen the drafting of the PNA and is being supported by PCC CIC (PCC CIC are a company that has experience of drafting PNAs and assisted in the drafting of the Welsh regulations).

The group was established in November 2020 and the purpose of the group was to develop and agree content of a robust pharmaceutical needs assessment that complies with the requirements of the National Health Service (Pharmaceutical Services) (Wales) Regulations 2020 and the needs of the local population. The PNA will also provide an evidence base for future local commissioning intentions.

The Chair of this Steering Group was the Director of Primary Care, Community and Mental Health and the members are representatives from Primary Care, Pharmacy, Public Health, Local Medical Committee (LMC), Communications team, Finance, Planning, CHC and Community Pharmacy Wales also Pharmacy project management support.

2. SPECIFIC MATTERS FOR CONSIDERATION BY THIS MEETING (ASSESSMENT)

Process Update

- 2.1 A public/patient survey was circulated to the UHB population at the end of December to mid-January and this received 637 responses. Also, as part of this process all Community Pharmacies have been consulted across Wales and this has resulted in 100% response rate.
- 2.2 The draft PNA (**Appendix 1**) was agreed by the Management Board on 21st April 2021. This document was then part of a consultation process for 60 days from 14th May to 13th July 2021. There is a defined list for consultation that received this document and the draft PNA was published on the UHB website. A summary of the observations and considerations are attached (**Appendix 2**) and seven responses were received and where appropriate the PNA has

been updated. The observations have been noted and no changes to the PNA were required except one statement. The overall response to this consultation has been positive and no current or specified need has been identified. The final approved document will be published by 1st October 2021.

- 2.3 The risk throughout this process is not having a robust and approved PNA. A submission to the risk register to identify actions to mitigate this has been agreed and the Executive lead has been identified.
- 2.4 The current provision of pharmaceutical services has been identified and mapped. Those providers who are located outside of Cwm Taf Morgannwg University Health Board's area but who provide services to its residents, were also considered. Furthermore, there are some services which affect the need for pharmaceutical services either by increasing or reducing demand. Such services include the hospital pharmacies, the GP Out of Hours service and Minor Injury Units and these have been considered as part of the PNA.
- 2.5 While an overview has been considered at the health board and local authority level, a cluster level review has also been undertaken of the demographic characteristics, health needs and the current provision of pharmaceutical services to residents. This has been used to identify whether current pharmaceutical service provision meets the needs of those residents. Consideration has also been given as to whether there are any gaps in service delivery that may arise during the five year lifetime of the PNA.
- 2.6 There are 110 pharmacies in Cwm Taf Morgannwg University Health Board all providing the full range of essential services. In 2019 to 2020, 95.5% of all prescriptions written by GP practices in the health board were dispensed by the pharmacies in the health board's area. Pharmacies also provide a range of advanced and enhanced services.
- 2.7 There are three GP dispensing doctor practices in Cwm Taf Morgannwg University Health Board, who dispense to eligible patients. These dispensed or personally administered 1.2% of prescription items. Non-dispensing doctors personally administered 1.1% of prescription items.
- 2.8 While there is very good service provision within the health board's area, some residents may choose to access pharmaceutical contractors outside of the health board's area. In 2019 to 2020, 2.2% of prescriptions were dispensed outside of Cwm Taf Morgannwg University Health Board. Whilst many were dispensed by pharmaceutical contractors in neighbouring health boards, some were dispensed as far afield as England. This suggests that that some

residents prefer to use a specific dispensing appliance contractor or a specialist provider, with some prescriptions being dispensed whilst the person is on holiday or near to their place of work.

- 2.9 Access to pharmaceutical services for the residents of Cwm Taf Morgannwg University Health Board is good. The vast majority of residents can access a pharmacy or dispensing doctor practice (where eligible) within 20 minutes by car. The main conclusion of this PNA is that there are currently no gaps in the provision of pharmaceutical services.
- 2.10 When considering whether there will be any future needs for pharmaceutical services that may arise during the five year lifetime of the PNA, consideration has been given to the predicted population growth and the capacity and distribution of service providers across the health board.

3. KEY RISKS/MATTERS FOR ESCALATION TO BOARD/COMMITTEE

- 3.1 The Cwm Taf Morgannwg University Health Board concludes that the current provision will be sufficient to meet the future needs of the residents and the health board has not identified any services that would secure improvements, or better access, to the provision of pharmaceutical either now or within the lifetime of the PNA.
- 3.2 It is important that the PNA identifies where there are specific gaps in pharmaceutical services and that this is proportionate, so as not to destabilize the existing pharmacy establishment by identifying a need where an additional pharmacy is not warranted, which could lead to closures. It is important that the process undertaken meets the requirements as set out in the regulations.
- 3.3 There is a risk in not having an approved PNA in line with the regulatory timescales, which require the PNA to be made available and published on the UHB website by 1st October 2021.

4. IMPACT ASSESSMENT

Quality/Safety/Patient Experience implications	Yes (Please see detail below)
	The new PNA regulations will change fundamentally how the community pharmacy Control of Entry decisions are made - by shifting from a system that is driven by the contractors and focused heavily on dispensing - to a system led by the

	NHS that responds to the wider pharmaceutical needs of local communities. This approach should improve access to care, widen the enhanced services provided by community pharmacies and support the inverse care principles of targeting health care provision where there is the greatest need.
Related Health and Care standard(s)	Safe Care
	Also: Staying healthy Effective Care Timely Care Individual Care
Equality Impact Assessment (EIA) completed - Please note EIAs are required for <u>all</u> new, changed or withdrawn policies and services.	Yes
	The PNA will need to incorporate the provision of the Equality Act 2010 to ensure that the assessment of pharmaceutical need considers the protected characteristics under the Act. The equality impact assessment is attached (appendix 3).
Legal implications / impact	Yes (Include further detail below)
	The Public Health (Wales) Act 2017, given Royal Assent on 3 July 2017, places an obligation upon health boards to undertake a pharmaceutical needs assessment (PNA). The regulations which came into force in Oct 2020, make it a legal requirement for Health Boards to complete and publish a pharmaceutical needs assessment (PNA) by 1 October 2021.
Resource (Capital/Revenue £/Workforce) implications / Impact	Yes (Include further detail below)
	There are potential financial risks of funding additional pharmaceutical contracts if gaps in pharmaceutical need are identified. This will form



	part of the Health Board planning process and be included in the IMTP if necessary.
Link to Strategic Well-being Objectives	Work with communities and partners to reduce inequality, promote well-being and prevent ill-health

5. RECOMMENDATION

The Population Health & Partnerships Committee are asked to:

- **NOTE** the report.