








## **PHARMACEUTICAL NEEDS ASSESSMENT POST CONSULTATION SUMMARY REPORT 2022**

### **Overview**

A total of 10 consultation responses were received. Although some surveys were completed on behalf of an organisation (4/10), others were received from a broad range of sectors/people, including health or social professional; community pharmacist contractors; dispensing doctor; members of the public.

Most consultees told us that the purpose of the Pharmaceutical Needs Assessment (PNA) is explained clearly (7/10 - 70%) and easy to understand (8/10 - 80%) giving scores of at least 7/10 with half scoring 10/10. However, there are points of accuracy raised by some consultees regarding how well the PNA reflects the current community pharmacy provision and the pharmaceutical needs of the East Riding of Yorkshire within their area(s). These points were considered by the PNA Group and are responded to in the table below.

### 1. Please select which area is most accurate about who you are or who you represent:

Answer Choices		Response Percent	Response Total
On behalf of an organisation		40%	4
Member of the public		20%	2
Health or social professional		20%	2
Pharmacist/appliance contractor		10%	1
Dispensing doctor		10%	1
		Answered	10

### 2. Please specify which organisation. Open Ended Question: Seven Responses.

1. Day Lewis Pharmacy

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2. Walkergate surgery

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3. East Riding of Yorkshire Council

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4. Humber Teaching NHS Foundation Trust

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5. Doncaster Council

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6. Humberside Local Medical Committee

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7. Boots UK limited

answered	7
skipped	3






### 3. Please select which area of work or type of organisation you represent:






Answer Choices		Response Percent	Response Total
Local authority		30%	3
Community pharmacy contractor		30%	3
NHS		20%	2
Dispensing doctor contractor		10%	1
Other (please specify):		10%	1
		answered	10

### 4. How sufficiently or insufficiently has the purpose of the PNA been explained? Please rate on a scale of 0-10, where 0 is very poorly and 10 is very clearly.

		Response Percent	Response Total
10/10		50%	5
5/10		20%	2
8/10		10%	1
7/10		10%	1
4/10		10%	1
		answered	10

### 5. How easy, or difficult, is the information in the PNA, to understand? Please rate on a scale of 0-10, where 0 is very difficult and 10 is very easy

		Response Percent	Response Total
10/10		50%	5
8/10		20%	2
7/10		10%	1
5/10		10%	1
4/10		10%	1
		answered	10

6. Please rate how accurately, or not, the PNA reflects the current community pharmacy provision within your area(s). On a scale of 0-10, where 0 is not at all accurately and 10 is very accurately.		Response Percent	Response Total
10/10		40%	4
6/10		20%	2
5/10		20%	2
7/10		10%	1
1/10		10%	1
		answered	10

**7. Please describe how we could improve how accurately the PNA reflects the current community pharmacy provision in your area(s). Open Ended Question: One response.**

**Response**

"The PNA describes some pharmacies providing Appliance Use Reviews and Stoma appliance customisation. Due to a personal development interest, I contacted these pharmacies and enquired about it, but none of the ones I contacted (Beverley and Bridlington Area) were providing these services. I believe the PNA is not accurate in describing the access to AUR and SAC in the area".

**Considerations**

Nationally, the numbers of pharmacies providing these services is very low because Stoma Appliance Customisation and Appliance Use Review services are generally provided by outsourced prescriptions to specialised appliance contractors outside of the East Riding area which have the advantage of holding the full range of products. One of the largest ones is in Leigh near Wigan, a town in the Metropolitan Borough of Greater Manchester. The HWB / public health has received no direct complaints regarding the efficiency of these usual outsourced services. Existing Pharmacies can apply to provide discretionary pharmacy NHS Stoma Appliance Customisation and Appliance Use Review Advanced Services if they are competent and where there is a local need.

On investigation, the consultee is correct. While completing the community pharmacy questionnaire (issued previously), there may have been some confusion from pharmacy contractors with appliance dispensing (which is an essential service) and appliance review.

**Action**

Advanced services are discretionary, not essential, the East Riding HWB is satisfied that those patients needing these services are served by the outsourced contractors. **There are no gaps identified. Further review of these services has been completed and amendments are made to the PNA Appendix Fifteen Commissioned Services Table, to the relevant sections of the Ward profiles and to the Executive Summary information and tables.**

**8. Any other comments? Open Ended Question: Four Responses.**

**Response One**

"Lloyds on Samman Road is nearly always closed due to no pharmacist. This impacts the surgery time to send to other pharmacies and for patients who live on the estate which is an area of high deprivation and they often have no transport to get to pharmacies further away. Needs urgent attention and sorting out. This has been reported several times but is getting worse".

**Considerations**

NHS England has had received five formal reported staffing issues due to unforeseen circumstances, resulting in 5 closures on 4 separate days (various times of closure) between April and August. Contract monitoring issues are dealt with outside of the PNA and are out with the remit of the PNA.

Although there should be enough pharmacies to meet the needs of the local populations in these areas, this is providing these services are operating in line with their contractual duties especially where continuity is vital in rural areas and/or areas of deprivation where pharmacies are less accessible.

**8. Any other comments? Open Ended Question: Four Responses.**

Should a pharmacy close or change its contracted hours for any reason, the impact of the change is assessed and if a gap is identified, there is a requirement for the PNA to be revised and reconsulted upon. If there is no gap created, a Supplementary Statement is issued alongside the PNA if necessary.

It is not within the remit of the PNA nor is it the responsibility of the HWB to address day to day provider contractual issues. Contractual monitoring is the responsibility of NHS England. NHS England is supporting contractors with how to report closures in a timely manner and pharmacies are required to promptly upload electronic prescriptions back to the NHS spine for re-direction to another pharmacy. In certain circumstances, NHS England will issue breach notices.

**Action**

No gaps in Essential Services Identified. **No change to PNA made.**

**Response Two**

“The most salient concern of residents is that provision is already stretched and that further development in the area will overburden the healthcare services”.

**Considerations**

The PNA Maps, Ward Profiles and Future Housing Plans sections of the PNA provide details of proposed housing developments which are considered in the Assessment. The impact of growth promoted by the East Riding Local Plan takes account of the PNA 2022-2025 and considers existing pharmaceutical service infrastructure support. However, where planning permissions have been granted, this does not guarantee that the buildings are in place and/or occupied.

NHS England will continue to include the HWB in any consultations regarding proposals/ applications for new pharmacies, including those because of building developments. There are many factors considered during such consultations, not least any changes to the numbers of fully occupied properties and shifts in population demographics within areas, and extended offer services from existing pharmacies.

**Action**

In line with the Regulations, the PNA takes account of significant housing sites with full or outline planning permission (proposed building developments) along with the numbers of dispensing practices (providing additional prescription services) and concludes that there is currently adequate provision of pharmaceutical services in Beverley and Brough. **No change to PNA made.**

**Response Three**






“Very comprehensive assessment”.

**Response Four**

“Boots UK Limited provide the MMS service however the PNA doesn't reflect this”.

**Action**

The service referred to by the consultee is the locally commissioned medicines support service (MSS) which aims to support vulnerable people receiving packages of care. **Amendments are made to the PNA Appendix Fifteen Commissioned Services Table.**

9. Please rate how accurately, or not, the PNA reflects the pharmaceutical needs of the East Riding of Yorkshire. On a scale of 0-10, where 0 is not at all accurately and 10 is very accurately		Response Percent	Response Total
10/10		40%	4
5/10		30%	3
8/10		10%	1
4/10		10%	1
3/10		10%	1
		answered	10

**10. Please describe how we could improve how accurately the PNA reflects the pharmaceutical needs of the East Riding. Open Ended Question: Two Responses.**

**Response One**

“Design a new method to gather the information. The questionnaire in PharmOutcomes is not very clear, and we seem to have to chase pharmacies to complete, because is not high on their lists of priorities. This lead to not paying enough attention to the task or non-compliance. given the importance of the PNA”.

**Consideration**

The Community Pharmacy Questionnaire is locally adapted from the national standard template and integrated into PharmOutcomes. Many pharmacies are familiar with the PharmOutcomes platform, which is used regularly mainly as a platform to provide and claim for commissioned services. It is more accessible than other forms of communication.

**Action**

New/additional methods should be designed/explored alongside the PharmOutcomes Platform for future PNA revisions, to make the process of completion less burdensome and clearer for pharmacies.

**Response Two**

“Pharmacists are often not available to maintain the continuity of the service, e.g., Brough Lloyds Pharmacy is often not able to dispense medication in a timely manner owing to shortages of pharmacists. We feel that for a growing area such as Welton, Brough and surrounding, the number of community pharmacies is not sufficient”.

**Considerations**

NHS England has had received three formal reported staffing issues due to unforeseen circumstances, resulting in 3 closures on 3 separate days (two full day closures). Contract monitoring issues are dealt with outside of the PNA and are out with the remit of the PNA.

Although there should be enough pharmacies to meet the needs of the local populations in these areas, this is providing these services are operating in line with their contractual duties especially where continuity is vital in rural areas and/or areas of deprivation where pharmacies are less accessible.

Should a pharmacy close or change its contracted hours for any reason, the impact of the change is assessed and if a gap is identified, there is a requirement for the PNA to be revised and reconsulted upon. If there is no gap created, a Supplementary Statement is issued alongside the PNA if necessary.

It is not within the remit of the PNA nor is it the responsibility of the HWB to address day to day provider contractual issues. Contractual monitoring is the responsibility of NHS England. NHS England is supporting contractors with how to report closures in a timely manner and pharmacies are required to promptly upload electronic prescriptions back to the NHS spine for re-direction to another pharmacy. In certain circumstances, NHS England will issue breach notices.

**Action**



No gaps in Essential Services Identified. **No change to PNA made.**

**11. Any other comments? Open Ended Question: One Response.**

**Response**

“Very comprehensive”.

## 12. Are there any currently provided pharmaceutical services that you are aware of which are not highlighted within the PNA?

Answer Choices		Response Percent	Response Total
No		80%	8
Yes		20%	2
		answered	10

## 13. Please tell us which pharmaceutical services you are aware of being currently provided but which are not highlighted within the PNA. Open Ended Question: Two Responses.

### Response One

"COVID-19 Vaccination".

### Considerations

During the PNA Consultation period, on 15th July 2022, the Joint Committee on Vaccination and Immunisation (JCVI) announced the groups of people to be targeted for the autumn COVID booster vaccination programme to commence on Thursday 1st September 2022. Since the start of the COVID-19 pandemic, over 1,500 community pharmacy sites have been vaccinating patients and health and care workers against coronavirus under a Local Enhanced Service alongside vaccination centres, hospitals, and Primary Care Network sites.

From autumn 2022, pharmacies are invited to provide a new service commissioned as a National Enhanced Service. This is additional to the existing Community Pharmacy Seasonal Influenza Vaccination Service which is a National Advanced Service.

### Action

Amendments are made to the Nationally Commissioned Enhanced Services Section of PNA Appendix Three "Description of Community Pharmacy NHS Services" to include this service.



### Response Two

"Boots provide the MMS service".

### Action

See question 8; Response Four above.

## 14. Do you feel that there are any gaps in the pharmaceutical services provision that are not covered by the PNA?

Answer Choices		Response Percent	Response Total
No		70%	7
Yes		30%	3
		answered	10

**15. Please tell us of any gaps in the pharmaceutical services provision that are not covered by the PNA. Open Ended Question: Three Responses.**

**Response One**

"Samman Road Lloyds needs proper provision and service for local residents".

**Action**

See Question 8; Response One above.

**Response Two**

"Regarding the Willerby, Kirkella, and Tranby wards, there has been changes in the number of pharmacies. The Distance Selling Pharmacy mentioned in the PNA doesn't exist anymore as it has transferred to Swanland Pharmacy. The number of pharmacies per 10000 population between both wards is 0.8, less than half the England average of 2.2. There could be a Gap in provision.

Also, Willerby Surgery has relocated to the south of the ward, which is reflected in the PNA, but affects the access to services in the area.

Regarding the gaps in Improvements and Better Access to Discretionary Services, the phrase: "May be accessed from/ signposted to pharmacies in Beverley - this may involve a drive time of more than 20 minutes" is not accurate some of the services (AUR and SAC) are not provided in Beverley".

**Considerations**

The closure of the distance selling pharmacy does not affect the figures in Appendix Fourteen of the PNA as any calculations therein do not include distance selling pharmacies. These pharmacies are excluded because they do not provide face to face essential services, and they serve people within and without of East Riding. Any relocation does not affect the conclusions of the PNA.

The numbers of pharmacies per 100,000 population by Ward in Appendix Fourteen are considered alongside the Ward Profiles for Tranby and Willerby and Kirk Ella. There are no GP dispensing practices in these Wards due to the urban nature of the Wards. Although there is no choice of pharmaceutical provider in either Ward (with the Distance Selling Pharmacy excluded), there are pharmacies on the City of Hull Boundary including three 100-hour pharmacies within 4 miles of the Tranby Ward and three pharmacies in the Hessle Ward.

This matter was referred to NHS England. Following investigation, NHS England confirmed that the distance selling pharmacy closed on 15 December 2020.

**Action** – Note: The East Riding HWB received no notification of this change from NHS England.

**There are no gaps resulting from the closure of the Distance Selling Pharmacy and there is adequate choice of providers for the Willerby, Kirk Ella and Tranby areas taking into consideration the proximity of pharmacies in neighbouring Wards and Hull HWB area.**

**PNA amendments are made to Map 29 (Tranby Ward); Map 30 (Willerby and Kirk Ella Ward); the relevant section of the Tranby Ward Profile; all additional maps affected by the changes in numbering (Maps 1,2,4,12, 32, 33); commissioned services PNA Figures 2,3,4; Appendix Fourteen (Number of Pharmacies per 100,000 Population), and Appendix Fifteen (Commissioned Services Tables).**

**Response Three**

"Please see comments in previous question regarding accuracy of PNA".

**Action**

No additional action necessary.



## 16. Any other comments or information that you feel should be included? Open Ended Question: Three Responses.

### Response One

"Without examine healthcare provision as a whole it will not be possible to determine the necessary levels of service provision. Doctors, dentists, and pharmacies all need to work in tandem and support each other in ensuring resident's needs are met. This is not currently the case and with further development forthcoming significant investment is need to bring service accessibility to an acceptable level.

Centralisation of medical provision in the more densely populated areas has left villages and hamlets without proper access to services. This may be an economically viable decision, but it is not a moral one nor in the best interest of residents. More needs to be done to see Village Halls used as points to receive health checks and receive prescriptions."

### Consideration

These points are both thought-provoking and well made. Any person experiencing difficulties with getting their prescriptions has the option of approaching their Community Pharmacy to see if they offer any discretionary home delivery services especially in rural areas and/or for old/ vulnerable residents. Whilst there are strict safety and governance requirements for prescription dispensing, handling and issuing, there is the possibility that Village Halls could be used as hubs for some NHS and public health services.

### Response Two

"Very comprehensive - nothing to add".

### Response Three

"N/a".




## 18. Please indicate your age group:

Answer Choices	Response Percent	Response Total
45 to 64 years	60%	6
25 to 44 years	20%	2
Prefer not to say	20%	2
	answered	10



## 19. Are you:

Answer Choices	Response Percent	Response Total
Male	50%	5
Female	30%	3
Prefer not to say	20%	2
	answered	10

## 20. Which ethnic group do you consider you belong to?

Answer Choices		Response Percent	Response Total
White (inc. Gypsy/Irish Traveller/Roma)		70%	7
Prefer not to say		20%	2
Asian/Asian British		10%	1
		answered	10

## 21. Do you consider yourself to have a disability? Note - The Equality Act 2010 considers a person to be disabled if they have a “physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities”. You do not need to be registered disabled.

Answer Choices		Response Percent	Response Total
No		80%	8
Prefer not to say		20%	2
		answered	10