

**Report on the
consultation results for
Wirral's Draft
Pharmaceutical Needs
Assessment 2018 – 2021**

**Wirral Health and Wellbeing
Board and Wirral Council**

**Wirral Intelligence Service
March 2018**

Report on the consultation results for Wirral's Draft Pharmaceutical Needs Assessment 2018 – 2021

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1.0	March 2018	Final report	Report on results of public consultation for draft PNA 2018 - 2021

Contents

Contents	2
Overview of Wirral's Pharmaceutical Needs Assessment 2018 - 2021	3
Background to consultation on draft Pharmaceutical Needs Assessment	4
Consultation on Draft Pharmaceutical Needs Assessment 2018 - 2021	5
Legislation	5
Consultation Groups.....	5
Range of consultation groups and routes.....	5
Methods.....	6
Formal consultation on the draft PNA	6
Prior Public and Partner Engagement.....	6
Results of consultation	6
Key findings from Question 1:	7
Key findings from Question 2:	8
Key findings from Question 3:	8
Key findings from Question 4:	9
Key findings from Question 5:	9
Conclusions	9
Links	10
Appendix One.....	11

The requirement to produce a Pharmaceutical Needs Assessment (PNA) is a statutory responsibility of the local Health and Wellbeing Board by virtue of the *National Health Service (NHS) Pharmaceutical and local Pharmaceutical services Regulations 2013*, which came into force on 1st April 2013. The regulations outline the process which NHS England (formerly known as the NHS Commissioning Board) must comply with in dealing with applications for new pharmacies or changes to existing pharmacies. This process relies on the PNA which must be robust and fit for purpose.

In Wirral, the Health and Wellbeing Board devolved the authority to develop its PNA to the Acting Director of Health and Wellbeing and other lead officers across partner organisations. Data sources included the local Joint Strategic Needs Assessment (JSNA), census data, local approach to health and wellbeing, Pharmacy Contractors' survey and a Residents survey. The surveys informed the first draft of the PNA which then went out for a formal (minimum 60 days) consultation.

The PNA presents a picture of community pharmacies, reviews services currently provided and considers how these could be utilised further. Community pharmacies can support the health and wellbeing of the population of Wirral in partnership with other community services and GPs. Services can be directed towards addressing health inequalities and supporting self-care in areas of greatest need.

Key Findings:

- Wirral is generally very well served by community pharmacies
- there is currently one pharmacy for every 3,492 residents, which compares extremely favourably to the national average of one pharmacy for every 4,724 resident population
- Wirral has a rate of 29 pharmacies per 100,000 population compared to a national figure of 21 pharmacies per 100,000 residents
- Wirral also has a higher ratio of pharmacies than its geographical neighbours including Cheshire West and Cheshire (at 23.7 per 100,000), Warrington (at 20.6 per 100,000), Cheshire East (at 22 per 100,000) and Halton (26.9/100,000)
- Wirral residents have adequate access to 'out of hours' pharmacy services through the provision of '100 hour contracts' and 'extended hour' contracts and there is good weekend coverage for residents of all four constituencies. Wallasey has the least pharmacies delivering extended or 100 hour contracts, but has reasonable coverage
- locally Commissioned Services are delivered equitably throughout the borough with all local constituencies having access to a range of services such as supervised consumption, alcohol and smoking interventions, emergency hormonal contraception and others
- geographical mapping of locally commissioned services show that more services are delivered in the most densely populated areas of the borough We must continue to deliver in line with any population growth and also deprivation

- 2,121 members of the public responded to the public consultation, giving their feedback on local community pharmacy services. Responses were overwhelmingly positive. Small numbers raised concerns over specific operational issues, but there were no significant service gaps identified
- all 92 local pharmacies responded to the community pharmacy survey (conducted as part of the needs assessment process) Again, this reinforced the wide range of services offered
- a total of 14 responses were received during the formal consultation period (*December 2017– February 2018*)
- in Wirral there are an increasing number of pharmacies now co-located with GP surgeries, with 26 in 2017 when compared to 12 in 2014, making the transition and relationships between GP and pharmacy staff more seamless
- this needs assessment has not identified any specific gaps in local service provision at the current time however, this will be kept under review

The draft PNA was presented for review to residents and a range of vested interest and other parties before it could proceed to a final document to be published. Outlined below are the results of that consultation held between December 2017 and February 2018.

Background to consultation on draft Pharmaceutical Needs Assessment

From April 2013, local Health & Wellbeing Boards became responsible for the publication of the local Pharmaceutical Needs Assessment (PNA), which provide a detailed review of existing pharmacy provision, including current service provision and opening hours as well as an assessment of population needs including areas of deprivation.

[Wirral's current PNA](#) was published in 2015.

Next Generation Wirral Pharmaceutical Needs Assessment (PNA) 2018 - 2021 and its Statutory Consultation period

On behalf of the Health & Wellbeing Board a new Pharmaceutical Needs Assessment (PNA) has been undertaken; given it is a legal, comprehensive, assessment of the current and future needs of local people for community pharmacy services.

The PNA is used primarily by NHS England to inform their local commissioning decisions with regard to community pharmacy services. It also informs local authorities and Clinical Commissioning Groups (CCGs) for planning purposes.

There is a legal requirement for the Wirral Health and Wellbeing Board to publish an updated PNA by 31st March 2018.

This section outlines the elements both required in the legislation and those sites taken to engage local residents and partners in the review of the draft PNA content.

Legislation

Regulatory Statements

The National Health Service (NHS) Pharmaceutical and local Pharmaceutical services Regulations (2013) set out the legislative basis for developing and updating PNAs and can be found at: <http://www.legislation.gov.uk/uksi/2013/349/contents/made>

Part 2: Regulation 8 sets out the mandatory consultation elements that must be adhered to when completing a new Pharmaceutical Needs Assessment.

Consultation Groups

Range of consultation groups and routes

According to pharmaceutical regulations the draft document has to be distributed to (no particular order):

- Community pharmacies
- Local NHS trusts that included local Hospital Trusts, Mental Health Trusts and Community Health Service providers
- Dispensing Doctors (none situated within Wirral boundary)
- Local Pharmaceutical Committee (LPC)
- Local Pharmaceutical Services (LPS) (no current contracts for Wirral)
- Local Medical Committee (LMC)
- Local Pharmaceutical Network (LPN)
- NHS England (NHSE)
- Clinical Commissioning Groups (CCG)
- Healthwatch
- Neighbouring Health and Wellbeing Boards

The draft PNA was also distributed to:

- GPs and other Primary Care staff
- Adult Social Services
- Neighbouring Local Authorities
- Public Health staff
- Presented at Adult Care Health Overview Scrutiny Committee – January 2018

Patients and Public

- Older People's Parliament
- Voluntary Sector Groups
- Community Sector Groups
- Faith Sector Groups

Other Methods

- Press releases to range of local media including Wirral View
- Council Website
- Council Engagement Contacts via email distribution
- Local Pharmaceutical Committee website and bulletin

Methods

Formal consultation on the draft PNA

As noted above as part of the production of the new PNA, there is a statutory requirement to consult for a minimum period of 60 days on the final draft PNA with a wide group of consultees including some mandated consultee groups, before formal acceptance and publication by the local Health & Wellbeing Board.

This local consultation was carried out across a range of routes to reach residents, interested parties and mandated consultees, through established methods such as contact lists, via key networks and partners, social media and options such as Wirral View.

The formal process began on Tuesday 5th December 2017 and closed on Monday 5th February 2018 (63 days in total). The legislation allows for full documentation to be published online and this was available at <https://www.wirralintelligenceservice.org/this-is-wirral/wirral-pharmaceutical-needs-assessment/wirral-pna-2018-2021-statutory-consultation/>. The website also provided access to an online survey facility and draft PNA so that residents and partners could review the PNA and then leave feedback on its content.

In addition hard copies of the PNA were made available at four venues, across four constituencies, where people could review a paper version of the draft PNA and, if they wished, feedback via paper survey responses.

Prior Public and Partner Engagement

Initial Public Survey – Pharmacy Services (May 2017)

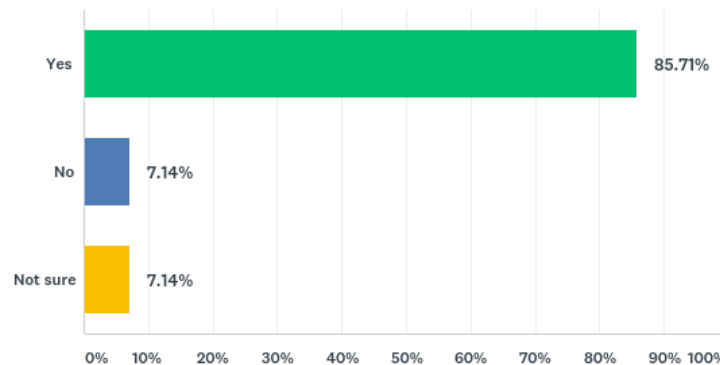
An initial public survey conducted in May 2017 yielded 2,121 responses. Responses were overwhelmingly positive. Small numbers raised concerns over specific operational issues, but there were no significant service gaps identified. The results of this survey can be viewed in Appendix Four of the published Wirral Pharmaceutical Needs Assessment 2018-2021)

Results of consultation

This section highlights the results of the public and partner consultation on the draft Wirral PNA between December 2017 and February 2018.

Fourteen (14) responses were received, all via the online facility, and those results are outlined below

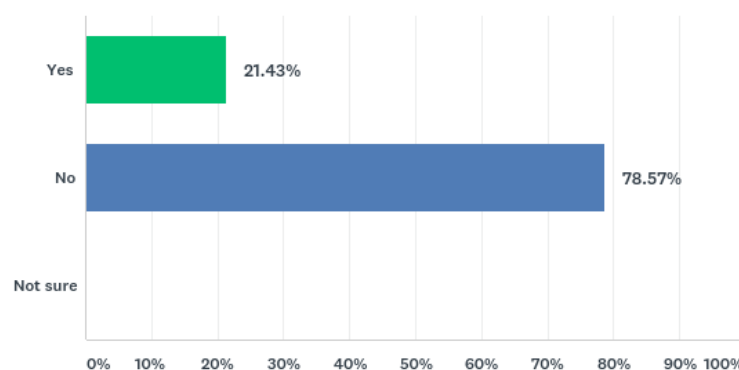
Q1 Do you think that the pharmaceutical needs of the population have been accurately reflected in the draft 2018-2021 PNA?



Key findings from Question 1:

- of those who responded (n~14) to the consultation, 86% (n~12) agreed that the draft PNA accurately reflected the local pharmaceutical needs.
- one person felt unsure and one person did not feel the needs of the population had been reflected accurately in the draft PNA and these comments have been reported in Appendix One below
- responses to comments from respondents:
 - One resident highlighted a concern that issues relating to older people may not be understood fully in the PNA. On reviewing the PNA there are a number of points of information that cover this group so it is felt that the draft PNA does reflect any needs (Q1- Comment 1.0)
 - It was also highlighted that 'rule changes' could affect pharmacy provision and were not noted in the draft PNA. On review this was assumed to imply Community Pharmacy Contractual Framework changes that were noted on Page 19. In order to further improve this content then more detail and added hyperlinks to the underpinning information have been added (Q1- Comment 2.0)

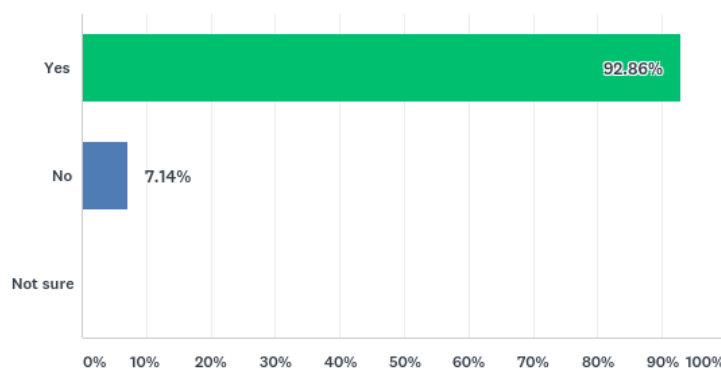
Q2 Do you think that any important information about local pharmacy services has been left out?



Key findings from Question 2:

- of those who responded (n~14) to consultation Question 2, 79% (n~11) agreed that the draft PNA carried all the important information on local pharmacy services
- Three respondents suggested otherwise and suggested that additional information was required. These comments have been reported in Appendix One below
- responses to comments from respondents:
 - two comments were received
 - It was suggested that changes in pharmacy funding affect provision and should be noted in the draft PNA. On review this was assumed to imply Community Pharmacy Contractual Framework changes that were noted on Page 19. In order to further improve this content then more detail and added hyperlinks to the underpinning information have been added (Q2- Comment 1.0)
 - One resident highlighted a concern regarding potential issues for older people having convenient access to pharmacy services and this may not be understood fully in the PNA. On reviewing the PNA there are a number of points of information that cover both range and satisfaction with current access so it is felt that the draft PNA does reflect adequate access (Q2- Comment 2.0)

Q3 Do you agree with the key findings about pharmaceutical services in Wirral (pages 3 - 4 and 95 - 96)?



Key findings from Question 3:

- of those who responded (n~14) to consultation Question 3, almost 93% (n~13) agreed with the key findings in the draft PNA
- one respondent suggested additional information was required and this comment has been reported in Appendix One below
- responses to comments from respondents:
 - One resident highlighted a concern that issues relating to older people may not be understood fully in the PNA. On reviewing the PNA there are a number of points of information that cover this group so it is felt that the draft PNA does reflect any needs (Q3- Comment 1.0)

Key findings from Question 4:

Do you have any further comments about the Pharmaceutical Needs Assessment?

- One respondent highlighted content related to original packs for administration of medication to patients by carers and that could be added to the draft PNA. On review this content was considered to add greater detail to the PNA and so was included (Q4 - Comment 1.0)
- One respondent highlighted the re-opening of Eastham Clinic. The draft PNA highlighted its closure and pending review though it's reopening happened during the consultation period. The PNA has been amended to reflect this change (Q4 - Comment 2.0)
- One resident highlighted a concern that issues relating to older people may not be understood fully in the PNA. On reviewing the PNA there are a number of points of information that cover this group so it is felt that the draft PNA does reflect any needs (Q4 - Comment 3.0)
- one respondent suggested maintain status quo and another mentioned no more to add (Q4 - Comment 4.0 and 5.0)

Key findings from Question 5:

For your pharmacy...Please can you review the information in the document and the Appendices for accuracy? Please provide details

- one respondent highlighted content that required minor corrections for their pharmacy and this has been amended for the final PNA (Q5 - Comment 1.0)
- three other respondents did not record any required changes (Q5 - Comment 2.0, 3.0 and 4.0)

Conclusions

The production of a new PNA has a statutory requirement to consult for a minimum period of 60 days on the final draft PNA with a wide group of consultees including some mandated consultee groups, before formal acceptance and publication by the local Health & Wellbeing Board.

Wirral's local consultation was carried out across a range of routes to reach residents, interested parties and mandated consultees, through a range of methods, for a period of 63 days between Tuesday 5th December 2017 and Monday 5th February 2018.

The legislation allows for full documentation to be published online with the website providing access to the online survey and draft PNA for feedback and in addition hard copies of the PNA and the survey were made available at four venues across the borough.

Fourteen (14) responses were received that highlighted some concerns and some required factual changes. Overall the responses received have led us to review the PNA and make amendments as appropriate though they have not materially altered the content in the draft PNA.

Links

Draft Wirral Pharmaceutical Needs Assessment (consultation document)

<https://www.wirralintelligenceservice.org/media/2293/wirral-pna-draft-2018-to-2021-december-2017-final-draft.pdf>

Blank survey questionnaire used for draft PNA 2018 – 2021 consultation – December 2017

https://www.wirralintelligenceservice.org/media/2317/surveymonkey_126836756-5.pdf

Webpage on Wirral Intelligence Service that hosted consultation content

<https://www.wirralintelligenceservice.org/this-is-wirral/wirral-pharmaceutical-needs-assessment/wirral-pna-2018-2021-statutory-consultation/>

Responses to Questions – qualitative answers

Q?	Detail	Comment from consultation	Response
1	<p>Do you think that the pharmaceutical needs of the population have been accurately reflected in the draft 2018-2021 PNA?</p>	<p>1.0 <i>The need for a local access point, as your comments rely on amount of places against other areas, this does not reflect the need's for the elderly and infirm members of communities</i></p>	<p>Reviewed content in Draft PNA to understand where it could be deficient on content related to people's wants and needs. The information is available as below:</p> <p>Part 2 - Resident Population: Health Needs & Wellbeing (pages 24 - 69) The range of local and related strategy and policy inferences to an aging population is extensive. Across them all is the intention to support an older population through a range of services and options. The geographic, demographic and health topic related information highlights key groups, such as older people, who require particular support in terms of pharmacy provision and how that might be delivered.</p> <p>Part 3 - Current provision of services (p.74 – 85). Highlights favourable distribution across Wirral with better numbers per population head than North West and England. This also applies across borough with numbers of extended hours/100 hours contracts. Travel on foot to Pharmacy, car drive times and opening hours also compare favourably to accepted minimum standards.</p> <p>Part 3 - Meeting the Pharmaceutical Need, Summary and Conclusions carries a section as Wirral Residents' Pharmacy Survey 2017 Public Consultation for Wirral PNA 2018 - 2021 (pages 84 - 90 with full survey in appendix 4) This survey was completed by over 2,000 residents, by far the biggest response across Cheshire and Merseyside and highlights the views of local people on pharmacy services. The survey highlighted:</p> <ul style="list-style-type: none"> - Almost 98% of survey respondents felt it was 'quite' or 'very' easy to get to their usual Pharmacy venue - in last 12 months over 96% of respondents had not experienced a problem accessing a pharmacy service - over 92% of respondents were satisfied with Pharmacy opening hours - those people aged over 40 accounted for over 93% of all responses to the survey

Q?	Detail	Comment from consultation	Response
1	Do you think that the pharmaceutical needs of the population have been accurately reflected in the draft 2018-2021 PNA?	2.0 <i>Because the rules are changing</i>	<p>No example as to whether this was Pharmacy related or on another health topic</p> <p>However if we assume this relates to Community Pharmacy Contractual Framework changes this is noted on Page 19 as this has reference to changes put in place by Government in relation to Community Pharmacy Contractual Framework and new approach with PhAS (Pharmacy Access Scheme) as a result of changes</p> <p>NOW</p> <p>To clarify this now added links to Government review documents, PhAS and response from Pharmaceutical Services Negotiating Committee on changes.</p>
2	Do you think that any important information about local pharmacy services has been left out?	1.0 <i>Although it could be there (I did read through but couldn't see it) - maybe there should be some reference to the effect that the pharmacy cutbacks might have on the ability of pharmacies to continue with the current levels of services?</i>	<p>Page 19 has reference to changes put in place by Government in relation to Community Pharmacy Contractual Framework and new approach with PhAS (Pharmacy Access Scheme) as a result of changes</p> <p>NOW</p> <p>To clarify this now added links to Government review documents, PhAS and response from Pharmaceutical Services Negotiating Committee on changes.</p>
		2.0 <i>as an aging population locally the need for convenient access is required. not just at limited centres</i>	See answer to Question 1 - part 1 above

Q?	Detail	Comment from consultation	Response
3	<p>Do you agree with the key findings about pharmaceutical services in Wirral (pages 3 - 4 and 95 - 96)?</p>	<p>1.0 <i>you are only looking at figures not people</i></p>	<p>See answer to Question 1 - part 1 above</p>
4	<p>Do you have any further comments about the Pharmaceutical Needs Assessment?</p>	<p>1.0 <i>We have sought feedback to the Wirral PNA from our contractors and members and haven't received any specific comments regarding the content of the PNA. We have received the suggestion of a paragraph from one of our members, which was included in the Essex PNA, that they felt you may want to include in the Wirral PNA - it supports the use of original packs for administration of medication to patients by carers rather than monitored dosage systems.</i></p>	<p>Content considered</p> <p>Now Reviewed other Cheshire and Merseyside Draft PNAs for their approach and added sections on Pharmacy services for collection, delivery and monitored dosage systems</p>

Q?	Detail	Comment from consultation	Response
4	Do you have any further comments about the Pharmaceutical Needs Assessment?	2.0 <i>Eastham Walk-In Centre is currently open</i>	Noted in draft PNA that a decision was pending on Eastham Clinic Now Checked with CCG Updated wording in PNA to account for change in status (as at February 2018)
		3.0 <i>Look to what the people want as well as need.</i>	See answer to Question 1 - part 1 above
		4.0 <i>None</i>	Noted
		5.0 <i>Maintain the status quo</i>	Noted
5	For your pharmacy...Please can you review the information in the document and the Appendices for accuracy? If you identify any issues please provide details with page number, section title, issue and the suggested correction	1.0 <i>Legend 88 - Well Pensby - Pensby Road The branch opening hours should be Monday to Friday 09:00 - 18:00 The branch does not offer the Obesity Management (Adults & Children) Service or the Smoking Cessation Counselling Service</i>	Noted and amended in final version
		2.0 <i>All appears fine to me!</i>	Noted
		3.0 <i>happy with accuracy</i>	Noted
		4.0 <i>None</i>	Noted