

**Wiltshire Council**

**Health and Wellbeing Board**

**11 July 2024**

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**Subject: Pharmacy Provision for Wiltshire**

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**Executive Summary**

The Pharmaceutical Needs Assessment (PNA) for Wiltshire is due to be refreshed for September 2025.

The PNA maps current provision, assesses local need and identifies any gaps in provision. The PNA is a key tool for identifying what is needed at a local level to support the commissioning intentions for pharmaceutical services and other services that could be delivered by community pharmacies and other providers.

Developing a PNA is a significant process, undertaken over the course of twelve months. The paper proposes an overarching process for this, alongside other activity underway to improve pharmacy provision.

**Proposal(s)**

It is recommended that the Board:

- i) Approves the formation of a steering group for development of the PNA for Wiltshire as set out in paragraph 10
- ii) Notes the outline timescale for development of the PNA (appendix 1)
- iii) Confirms the governance for responding to consultations on market entry and market consolidations and the issuing of supplementary statements set out in paragraph 15
- iv) Note the update on wider community pharmacy initiatives to be provided by NHS Bath & NE Somerset Swindon and Wiltshire Integrated Care Board (NHS BSW ICB)

**Reason for Proposal**

The Health and Social Care Act 2012 gave responsibility for developing and updating of PNAs to health and wellbeing boards (HWBs). The legislative basis for developing and updating PNAs is set out by the National Health Service (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013. A new PNA is required by the end of September 2025. There are a range of other activities underway in the NHS which are relevant to pharmacy provision.

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### Subject: Pharmacy Provision for Wiltshire

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#### Purpose of Report

1. To outline the governance for pharmacy provision in Wiltshire and the proposed process for developing the next PNA.

#### Relevance to the Health and Wellbeing Strategy

2. The Joint Local Health and Wellbeing Strategy for Wiltshire ([2023-2032](#)) sets out four themes, including 'working together and integration' where *'we design and deliver our activities in partnership with service users, local communities and public sector partners. We collectively consider how to integrate our work, get maximum value for public sector spend and plan our use of the public sector estate together'*. This includes a commitment to achieving change by improving join-up of services through community healthcare, primary, secondary and tertiary healthcare (including pharmaceutical services). The PNA is an important statutory duty that sits alongside this commitment.

#### Background

3. From 1st April 2013, every Health and Wellbeing Board (HWB) in England (including Wiltshire) received statutory responsibility to publish and keep up to date a statement of the needs for pharmaceutical services of the population in its area, referred to as a pharmaceutical needs assessment (PNA). As Board members will be aware, the Health and Wellbeing Board was introduced by the Health and Social Care Act 2012 as a partnership that brings together the leaders of the health and social care system, that is the NHS (including Bath and North East Somerset, Swindon and Wiltshire (BSW) Integrated Care Board (ICB)) and Wiltshire Council (including public health) with other partners such as Healthwatch Wiltshire.
4. In April 2023, NHS BSW ICB received delegated responsibility of NHS England pharmaceutical, ophthalmic and dental functions, with the intention being to demonstrate that giving ICBs responsibility for a broader range of functions enables them to design services and pathways of care that better meet local needs and priorities.
5. PNAs are used by the NHS (through the South West Pharmaceutical Services Regulations Committee (PSRC)) to make decisions on which NHS funded services need to be provided by local community pharmacies. These services are part of local health care and public health and affect NHS budgets. PNAs are also relevant when deciding if new

pharmacies are needed, in response to applications by businesses, including independent owners and large pharmacy companies. The NHS also has a duty to notify local stakeholders and conduct impact assessments on market exits (closures) and changes to 100-hour contracts ([Pharmacy Manual](#)). The SW PSRC is supported by a Collaborative Commissioning Hub (CCH), which NHS England South West established with the Integrated Care Boards in the region.

6. The Wiltshire Health and Wellbeing Board is one of the stakeholders that can provide input to consultation by the PSRC on pharmacy consolidations and new market entries. The Wiltshire Health and Wellbeing Board can also issue supplementary statements to the PNA when there is a significant change to provision. Supplementary statements to the PNA are statements of fact and 'are not a vehicle for updating what the pharmaceutical needs assessment says about the need for pharmaceutical services'. In certain specific circumstances defined by the regulations (for example, when a consolidation application has previously been refused but then subsequently followed by a closure) the Health and Wellbeing Board should consider whether a supplementary statement is needed (likely to be the case if the PSRC was of the view that to grant the consolidation would create a gap in pharmaceutical services provision). This is set out in [government guidance](#).
7. The [existing PNA](#) for Wiltshire expires in the autumn of 2025 and initial work has begun on updating this, which will involve consultation with local communities and consideration of changes in the market that have taken place since 2022 (including increased online provision and the expansion of services that are delivered).
8. The Department of Health and Social Care (DHSC), NHS England and Community Pharmacy England are responsible for the Community Pharmacy Contractual Framework (CPCF), which is the overall contractual framework that ICBs use to monitor community pharmacy compliance with national service delivery. The CPCF aims to expand the range of services offered making better use of the clinical skills in community pharmacy, making them the first port of call for patients for many minor illnesses. The [Pharmacy First](#) initiative rolled out in early 2024 is an example of an initiative delivering this ambition. The CPCF expires in 2024 and the next five-year settlement is currently under negotiation. The Health and Social Care Committee recently [called for](#) a radical overhaul of the CPCF in any new settlement. A range of additional services above standard provision are also commissioned by [BSW](#); and Wiltshire Council's public health team also commissions substance misuse and sexual health services through pharmacies.
9. NHS BSW ICB will consider the implications of any new CPCF settlement locally and ensure appropriate ongoing contract management (including sanctions). Alongside this NHS BSW ICB is developing a pharmacy workforce strategy, recognising the number of pharmacists per 10,000 GP patients in BSW is currently the lowest in the country and by 2026 all newly qualified pharmacists will be independent prescribers on the day of registration (existing pharmacists may wish to pursue this training) which

presents an opportunity for NHS England or BSW ICB to commission services in community pharmacy aligned to long term conditions care as well as support with minor illnesses.

## Main Considerations

10. Drawing on the guidance to Health and Wellbeing Boards referred to above, it is recognised good practice to establish a steering group for the development of the PNA. The proposed membership includes representatives from:
  - NHS BSW ICB / NHS England
  - Wiltshire Council (including public health and communications)
  - Wessex Local Medical Committees
  - Healthwatch Wiltshire (including appropriate representation of the views of Area Board health and wellbeing champions)
  - Community Pharmacy Swindon and Wiltshire (Local Pharmaceutical Committee)
11. The local organisation for community pharmacy is the Local Pharmaceutical Committee (LPC), [Community Pharmacy Swindon and Wiltshire](#), which represents all NHS pharmacy owners in Swindon and Wiltshire. The committee is an elected body recognised under the NHS yet independent. The committee is elected from a range of independent pharmacy contractors, The Company Chemists Association (CCA) and Association of Multiple Pharmacies (AIM). CPSW works with the NHS, the local Integrated Care Board and local Health and Wellbeing Boards to help plan healthcare services and negotiates and discusses pharmacy services with commissioners. They are recognised by NHS England and NHS ICBs at local level and are consulted on local matters affecting pharmacies. LPCs work closely with their medical equivalent, the LMC and work to support and represent pharmacy owners. CPSW works to ensure that community pharmacies are integrated into the NHS, provide clinical services, and contribute to public health initiatives. The Support and Implementation Manager for CPSW, Carolyn Beale, will be in attendance for this item.
12. The steering group will have the opportunity to consider the detailed project timeline, the way in which the PNA should be presented for localities, the nature of the consultation with contractors and the public, and the overall format of the document. Alongside this, there is the opportunity to consider the approach to understanding what counts as adequate provision (drawing on work currently being undertaken by Healthwatch Wiltshire), the opportunity to use pharmacies to address the wider determinants of health, the scope for further development in relation to the provision of enhanced services and the integration of work between community pharmacy, community hospitals and acute hospitals in Wiltshire.
13. A draft PNA will come back to the Health and Wellbeing Board ahead of consultation (by March 2025) and then again for sign off with the results of the consultation (by September 2025). An outline timeline, subject to change, is included as **Appendix 1**.

14. The officer team putting together the next draft PNA are considering the elements on which it makes sense to collaborate with our neighbours in Swindon and B&NES who are working to similar timescales – including elements on data and mapping and consistency in the presentation of information.
15. In the meantime, the Board is asked to confirm the governance for NHS consultations on market consolidations and market entries; and the issuing of supplementary statements to the PNA following what may be deemed a significant change in provision. In such circumstances, Board members will be contacted with an opportunity to express a view and a response will be drafted by Wiltshire Council officers. Where there are any differences of opinion, a final response will be agreed in consultation with the chair of the Health and Wellbeing Board (or the vice chair in their absence). Members of the PNA steering group will also be canvassed for their view on the need for any supplementary statement.
16. A short update on community pharmacy priorities for NHS BSW ICB will be provided to the Board to accompany this paper, including the work of the Community Pharmacy Operational Group, the latest position on market changes, Pharmacy First, work with Primary Care Networks, independent prescribing at five sites in BSW and workforce developments.

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Report Authors: as above

Appendix 1: Outline timeline for the development of the Wiltshire PNA