

Health and Wellbeing Board (HWB) Paper

1. Reference Information

Paper tracking information	
Title:	Surrey Pharmaceutical Needs Assessment (PNA) 2022
HWBS Priority - 1, 2 and/or 3:	Priority 1, 2 and 3
Outcome(s)/System Capability:	Outcomes across the priorities. System capabilities: Integrated Care; Data, insights and evidence; Empowered and Thriving communities
Priority populations:	Potential to support outcomes for all priority populations
Civic level, service based and/or community led interventions:	Service-based
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Board Sponsor(s):	Ruth Hutchinson - Director of Public Health (Surrey County Council)
HWB meeting date:	28 September 2022
Related HWB papers:	N/A
Annexes/Appendices:	Annex 1 - Surrey Health and Wellbeing Board Pharmaceutical Needs Assessment October 2022 Annex 2 - Appendices: Surrey Health and Wellbeing Board Pharmaceutical Needs Assessment October 2022

2. Executive summary

Every Health and Wellbeing Board (HWB) in England has a statutory responsibility to assess the need for pharmaceutical services in its area and to publish (and keep up to date) a statement of its assessment; this is termed a pharmaceutical needs assessment (PNA) (as per Section 128A of the National Health Service Act 2006 (NHS Act 2006), amended by the Health and Social Care Act 2012¹). The PNA then forms an essential part of the decision making about market entry for new service providers of pharmaceutical services.

National regulations ([The National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013](#)) require PNAs to be revised at least once every three years or more frequently if changes to the local population or services are sufficient to require a supplementary statement. Surrey HWB published its last PNA in April 2018. Due to the impact of responding to the COVID-19 pandemic, the Department of Health and Social Care (DHSC) extended the usual three-year deadline stating that HWBs must publish a revised PNA by 1 October 2022².

Surrey HWB delegated responsibility for overseeing the production of the Surrey PNA 2022 to a Steering Group (PNA SG) consisting of key professionals from the Surrey Local Pharmaceutical Committee, Surrey Local Medical Committee, Integrated Care Boards, NHSE regional representatives, Public Health, the Surrey County Council communications team and Healthwatch. This group has met regularly since October 2021.

The purpose of this paper is to **present** key aspects of the Surrey PNA 2022, including its recommendations, to the HWB for **final approval** and to **seek agreement** to its publication no later than 1 October 2022.

When making an overall PNA conclusion, schedule 1 to the NHS Regulations (2013), as amended, require the PNA to make assessments against specific set criteria:

- The conclusion of this PNA is that there are no gaps in **necessary services** in Surrey. The number, distribution and choice of pharmaceutical services meets the current needs of Surrey's population and future needs foreseen within the lifetime of this PNA (three years from 1 October 2022 until 30 September 2025).
- There are no identified needs for **additional pharmaceutical services**, or enhancements to current arrangements across the county that would secure **improvements or better access to services**.
- The PNA noted that current **locally commissioned services** (provided by Surrey public health and the ICBs) provide an improvement to pharmaceutical provision for the population of Surrey.

Findings and recommendations supporting these conclusions are enclosed within this paper.

¹ [Health and Social Care Act 2012 \(legislation.gov.uk\)](#)

² [Pharmaceutical needs assessments: information pack - GOV.UK \(www.gov.uk\)](#)

3. Recommendations

Health and Wellbeing Board members were provided a copy of the PNA for comment during the four-week period Friday 5 August 2022 to Friday 2 September 2022. All comments received were addressed and incorporated.

1. In order to give final approval of the PNA for publication, it is suggested that the HWB consider:
 - a. Whether the process followed to produce the PNA (set out in section 5 of this paper) was robust and met related regulations?
 - b. Whether the findings are appropriate to the evidence found?
2. It is recommended that the Health and Wellbeing Board approves the final draft of the Surrey PNA 2022 (Annex 1) including its Appendices (Annex 2) and agrees to its immediate publication.

4. Reason for Recommendations

Development of Surrey's 2022 PNA has met all requirements of [The National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013](#). Its production has been led by a skilled steering group (PNA SG) of relevant professionals. The PNA has been signed off by the PNA SG as a compliant and accurate assessment and has received their recommendation.

The final PNA is a HWB product and, as such, requires formal sign-off by the HWB prior to publication. PNA legislation requires the signed-off assessment to be published on Surrey County Council's Local Authority website by 1 October 2022³.

5. Detail

What is the PNA, and what is its purpose?

From 1 April 2013, HWBs have a statutory responsibility as set out in the Health and Social Care Act 2012 to publish and keep up to date the PNA which provides a statement of need for pharmaceutical services for the population of its area.

Under the [National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013](#), a person (a pharmacist, a dispenser of appliances, or in some circumstances and normally in rural areas, a GP) who wishes to provide NHS pharmaceutical services must 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. The PNA is therefore also an essential part of the process of making decisions about market entry for new service providers.

More widely, a PNA gives an opportunity for the HWB to understand how pharmacies might better contribute to addressing the health needs of the local population through identifying gaps in access or the potential to improve the health of the local population through more targeted interventions.

³ [The National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013 \(legislation.gov.uk\)](#)

National regulations require PNAs to be revised at least once every three years or more frequently if changes to the local population or services are sufficient to require a supplementary statement. This PNA replaces the assessment undertaken by Surrey County Council Public Health in 2018. The lifetime of this PNA will be three years from 1 October 2022 until 30 September 2025.⁴

Process for developing the PNA

The Surrey HWB delegated responsibility for overseeing the production of the Surrey PNA 2022 to the PNA SG consisting of key professionals from the Surrey Local Pharmaceutical Committee (LPC), Surrey Local Medical Committee (LMC), Integrated Care Board (ICB), NHSE regional representative, Public Health, the Surrey County Council communications team and Healthwatch. This group has met since October 2021 to provide guidance, support, and oversee production.

The National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013⁵, were used to inform the production process along with guidance documentation published by the DHSC in October 2021⁶.

The key steps in production included:

- Review of Surrey's 2018 PNA⁷ and any supplementary statements, the National Health Service (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013⁸, and subsequent amendments.
- Consideration of pharmaceutical service provision against local health needs, local pharmaceutical service changes and any recent or future planning for housing developments.
- Assessment of pharmaceutical services and activity provided (essential, advanced, enhanced and other NHS services (locally commissioned) to enable comparison nationally and locally, and mapping of service provision including travel time to identify any service gaps.
- A survey of the Surrey citizen's panel, as well as targeted circulation of the questionnaire to assist in reaching seldom heard groups and populations across Surrey that may experience health inequalities, in a targeted effort to seek views from these groups (see section 8 on 'engagement' below for further details).
- A survey to contracted pharmaceutical services, and dispensing GPs.
- Publication of a draft PNA for a minimum 60-day formal consultation between the period of May to July 2022 to seek views of the public and other stakeholders to ensure the PNA is reflective of the needs of the Surrey population. This consultation complied fully with regulatory requirements. Good engagement was received. A report on the consultation can be found at section 9 of the PNA.

⁴ [The National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

⁵ [The National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Legislation](#)

⁶ [Pharmaceutical needs assessments: information pack](#)

⁷ [Surrey Pharmaceutical Needs Assessment 2018](#)

⁸ [The National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Legislation](#)

- The final PNA report was presented to the Surrey HWB for a four-week review period, Friday 5 August 2022 to Friday 2 September 2022.

Public Health within the PNA SG sought further assurance on the production of the PNA via:

- ensuring to keep the HWB updated on progress, presenting twice on the development of the PNA. Updates were provided at informal meetings on 9 Feb 2022 and on 1 June 2022; and
- monitoring and reviewing neighbouring HWB's PNAs and incorporating relevant findings to the Surrey PNA.

Key findings and recommendations of the Surrey PNA 2022

Changing policy context

This PNA recognises the ongoing important role of community pharmacies and the changes to their way of working throughout the COVID-19 pandemic.

The PNA acknowledges the report on the 'Next steps for integrating primary care: Fuller stocktake report' (Fuller report). The Fuller report calls for integrated neighbourhood 'teams of teams' to evolve from primary care networks and highlights the importance of community pharmacy teams in urgent care and prevention, including early diagnosis of cancers. The Fuller report points out that pharmacists could play 'a more active role in signposting eligible people to screening and supporting early diagnosis, building on a number of successful pilots such as those from the Accelerate, Coordinate, Evaluate programme'.⁹

Finding - Local health needs

Population growth and the number of proposed housing developments in each locality (district and borough) across Surrey is not expected to exceed the needs that can be managed by existing providers during the life time of this PNA, however recognising the potential for change due to proposed large scale housing developments in Surrey, it is recommended that the PNA Steering Group should review actual increases in population and housing and the implications of any increases on an annual basis, publishing their findings in a PNA supplementary statement.

Finding - Current pharmaceutical service provision

Review of the necessary pharmaceutical services in Surrey has found no gaps in current or future provision. Across Surrey, there is good access to community pharmacy or dispensing general practice within a reasonable travel time by car during weekdays and Saturdays.

All Surrey residents are within a five-mile radius of an open pharmacy on a weekday, however for some residents, such as those living in more rural areas, or with limited

⁹ <https://www.england.nhs.uk/publication/next-steps-for-integrating-primary-care-fuller-stocktake-report/>

access to transport (public transport or their own car), or with limited mobility the access to community pharmacy may be less good but is complex to quantify. In these cases, access to essential services may be ameliorated by the growing availability of internet pharmacies and the willingness of some pharmacies to deliver prescription medications.

Finding - Feedback from public and providers

Most of the public and provider responses received indicated that the provision of pharmaceutical services and access is sufficient overall in Surrey.

Overall conclusion

The conclusion of this PNA is that there are no gaps in necessary services in Surrey. The number, distribution and choice of pharmaceutical services meets the current needs of Surrey's population and future needs foreseen within the lifetime of this PNA.

There are no identified needs for additional pharmaceutical services, or enhancements to current arrangements across the county that would secure improvements or better access to services.

The PNA noted that current locally commissioned services (provided by Surrey public health and the ICBs) provide an improvement to pharmaceutical provision for the population of Surrey.

The PNA recognises the ongoing important role of community pharmacies in improving the health and wellbeing of local communities as highlighted in the Fuller Report.

6. Challenges

Recognising the potential for change in local populations due to proposed large scale housing developments in Surrey, the PNA SG should review actual increases in population and the implications of any increases on an annual basis and publish their findings in a PNA supplementary statement.

7. Timescale and delivery plan

This final PNA for 2022 requires sign-off by the HWB ahead of publication no later than 1 October 2022.

8. What communications and engagement has happened/needs to happen?

Throughout the process of developing the Surrey PNA, key stakeholders have been engaged.

PNA Steering group (PNA SG)

The PNA SG was established with representation from key professionals (see section 5 of this paper).

The primary role of the PNA SG was to advise as well as to develop structures and processes to support the preparation of a comprehensive, well researched, well considered, and robust PNA, building on expertise from across the local healthcare community. The group ensured that the views of the main stakeholders were considered.

Formal consultation

As stipulated in [The National Health Service \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013](#), the PNA SG ensured that a draft of the PNA was available for public consultation for 60 days between 13 May 2022 until 12 July 2022 (see section 5 of this paper).

The consultation was sent to the list of stakeholders as stipulated in regulation 8 of the 2013 regulations. The consultation was also circulated for comment and further onward circulation to several other relevant stakeholders including the place-based leads within Surrey Heartlands and Frimley ICSs, the director of pharmacy across Surrey Heartlands ICS and known chief pharmacists. The consultation was also promoted through the PNA SG's wider networks, including the LPCs in Hampshire, Kent and Medway and South London.

Questionnaires with the public and contractors

Surveys were completed with the public (via the Surrey Citizen's panel), community pharmacists and dispensing doctor contractors.

In addition to surveying the Surrey Citizen's panel, the PNA SG requested that an extended version of the panel questionnaire should be circulated more widely, in a targeted effort to seek views from population groups that may experience health inequalities across Surrey. This adapted version of the survey was published online using Surrey-says and was publicised via targeted posts to residents of the wards which have areas with the most deprived small areas across Surrey (as outlined in Surrey's Health and Wellbeing Strategy which is available online at the following webpage: [Surrey Health and Well-being Strategy update 2022 - Priority Populations](#)).

9. Next steps

Legislation requires the PNA to be published on Surrey County Council's Local Authority website by 1 October 2022. This is a national requirement for every HWB across the country. As a HWB product, the final PNA requires formal sign-off by the HWB prior to publication.

1. Following sign off, the PNA will be published online on Surrey-i, no later than Friday 30 September 2022 (last working day before deadline).

2. PNA regulations state each HWB must publish a statement of its revised assessment within three years of its previous publication of a PNA. The Surrey PNA should therefore be revised by 1 October 2025. In the interim, the PNA SG will review annually the need for a revised statement or a supplementary statement to keep the PNA up to date as required by legislation.