

Appendix 6b

Q1. Do you think the information contained within the draft PNA adequately reflects the current pharmaceutical services provision Warwickshire?		
Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
Our opening times are incorrect our store opens 9am-7.30pm Monday to Friday, Saturday we open 9am-6pm and Sunday we open 10.30am-4.30pm the current information states we open 9am-7pm please can this be changed.	Details noted and clarification/confirmation sought from NHS England	Amendments made in line with advice from NHS England. The pharmacy changed their hours w/c 4/1/15 to the hours they stated i.e. 9am – 7.30pm M-F, weekends unchanged.
By testing a sample of the data the LPC has identified numerous inaccuracies in both service design, service delivery and opening hours. We believe the errors are introduced by the data collection process where human error could corrupt the accuracy at numerous stages, completion of survey monkey by inexperienced staff, transfer of data from survey monkey to the database by CSU staff, asking questions where answers are difficult to quantify. The LPC has advised individual contractors to notify CSU of the inaccuracies in their data however it is likely that not all errors will be identified and corrected. Consequently, in order for the PNA to be fit for purpose, the HWB should check whether a supplementary statement is required for the relevant area before the PNA is used to assess contract applications.	Throughout the process, the poor engagement of some contractors in supplying accurate data has been noted. The assessment utilised data available, having taken steps to triangulate wherever possible. Inaccuracies have been notified by contractors during the consultation and amendments made where necessary, but none have been significant to change the overall findings of the PNA. The HWB will undertake the preparation of Supplementary Statements as per Regulation following publication of the PNA, of which NHS England should be mindful when they are considering Market Entry applications.	Amendments made to data where necessary.
Whilst assessing the provision of pharmaceutical services the PNA looks at bank holiday coverage and concludes cover is adequate. Could the PNA consider how this situation changes when boxing day falls on a Saturday. In the past most contractors have been forced to open core hours on the Saturday and been allowed to close on the following Monday. This opening pattern goes against demand for services which are typically lower on the 26 th and higher on the 28 th .	This specific issue is outside the remit of the PNA. Suggest LPC approaches PSNC and discusses with NHS England	No actions within the PNA

Q2. Do you know of any relevant information that we have not included which could affect the statements (or conclusions) in the document?

Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
<p>Given the huge growth in housing expected over the strategic period how are pharmaceutical requirements included in the planning system and will adequate provision be provided before completion of the individual housing estate development. How will S106/CIL monies be accessed to ensure that happens?</p>	<p>Planning issues have been considered within the PNA for the next 3 years. A new PNA is required to be produced at least every three years. The working group therefore decided that there was no merit in trying to predict future need beyond three years as at that time, a better informed updated assessment would be prepared. If any large housing developments are completed within the next three years or if any other localised residential areas develop a need for pharmaceutical services the demand will prompt a potential Market Entry application which will be processed by the NHS England Area Team. As a potential Market Entry / contract performance issue, this should be picked up by the NHS England Area Team</p>	<p>No actions required within the PNA</p>
<p>Insert right opening times</p>	<p>Details noted and clarification/confirmation sought from NHS England</p>	<p>Amendments made to hours</p>
<p>Contractors in North Warwickshire received notice that the minor ailments service was decommissioned when the PCT was dissolved on 1/4/13 and at present we have no service specification for the service. The LPC recognises that some contractors are still being paid to provide minor ailments however we don't believe the design of this service delivers the patient outcomes that today's NHS should. We hope that the existence of this service does not impede the development of an updated and improved county wide service.</p>	<p>NHSE confirmed that MA service is still commissioned in WNCCG. Suggest LPC contact NHSE to discuss specific issues regarding this service. Regarding the LPC suggestion that this should be adopted as a County wide service suggest LPC prepare statement with explanation and evidence of need to be considered at next meeting.</p>	<p>No actions within the PNA</p>
<p>There is currently no palliative care support and this has been distressing to both pharmacists and patient's relatives when trying to obtain medicines to support end of life care.</p>	<p>No specific evidence has been presented as part of the PNA process. Suggest LPC discuss with CCGs and NHSE</p>	<p>No actions within the PNA</p>
<p>The Needle exchange service description does not highlight the benefit of removing dirty needles from community refuse services.</p>	<p>Noted, and amendment to be made (p.22)</p>	<p>Amendments made where necessary.</p>

Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
The summary on page 26 implies a community pharmacy is present in every shopping centre. Please reword or remove the implication since shopping centre is not defined.	Noted, and amendment to be made (p.26)	Amendments made where necessary.
On page 35 the PNA describes the equality act and how pharmacies meet their legal obligations. We believe this is a matter where pharmacists will use their professional judgement on a case-by-case basis. By including a list of potential actions the PNA may be seen as prescriptive. For example if a contractor uses their judgement and refuses a monitored dosage system there should be no implication that a pharmaceutical need exists. Perhaps this section should be included with less detail and simply state that "pharmacies comply with their obligations under the equality act by making a wide range of reasonable adjustments to suit the needs of the patient"	This recognises the fact that many community pharmacists provide above that required in their contract e.g. MDS services to care homes. Extra statement suggested by LPC could be included	No further action required
On page 38 the MUR data appears to be contradictory when nearly 100% of contractors state they deliver but the table above implies only 48 contractors are delivering them.	The figures are based on contractors' responses, where only around 50 contractors replied to this question. Mention is made in draft on p.12	No actions required
Page 66 uses the acronym SOA twice before defining it as Super Output Area in the 4th paragraph.	The definition is included with the first mention on p.60 and also in the list of abbreviations	No actions required
The PNA should not include information on stock availability. The problems with the medicine supply chain affect all contractors equally and are outside the scope of the PNA.	This is included in response to public feedback that they cannot access their medicines. Further clarification statement welcomed from the LPC	No actions required
Pharmacy Hours for Galley Common Contract FHG34 Core hours Mon - Fri 9am- 1pm and 2pm – 6pm Supplementary hours Mon – Fri 1-2pm and Saturday 9am-1pm	Details noted and clarification/confirmation sought from NHS England	Amendments made as necessary
The draft PNA does not appear to take account of services provided to residents of Warwickshire by pharmacy contractors across the borders in other HWB areas; anecdotal information from Staffordshire contractors near the Warwickshire border suggests that there is considerable cross-border dispensing of prescriptions. See also Q5 – other comments.	The PNA acknowledges that pharmaceutical services will be accessed beyond the county boundaries, and this is reflected in the mapping	No actions required

Q3. Do you think there are any gaps in the provision of pharmaceutical services that Warwickshire HWBB has not identified?

Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
Patients should be able to use their nearest pharmacy or prescribing practice and not have to travel to the approved provider	Patients are free to choose where to access pharmaceutical services	No actions required
However some comments from the public imply there are gaps especially around lunchtime closures (Kenilworth) . Please verify that these are accurate before including the quotes.	P.117 states: A small number of respondents to the public engagement process expressed a need for a 24/7 service in Warwick and poor access to a service during the lunch hour in Kenilworth and on Saturday afternoons. These views have been considered but it has been concluded that overall the current spread of contractor opening hours is adequate and does not present a barrier to access in this locality. It is not possible to verify an opinion only a fact.	No actions required

Q4. Do you agree with the assessment of potential future needs for pharmaceutical services?

Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
<p>There were no PNA focus groups in Stratford District. Why Not? That leaves your conclusions as potentially inadequate.</p> <p>The pharmacies should accept the return of all used/not required appliances for subsequent re-cycling.</p> <p>Why are minor ailment services only available in North Warwickshire</p>	<p>Within the limited prescribed timescales, focus groups were offered and held as widely as possible</p> <p>Unused products cannot be recycled</p> <p>A need for a Minor Ailments Service has not previously been identified in other areas of Warwickshire. This PNA has also not identified a gap and/or need</p>	No actions required
Conclusions repeatedly refer to increased roll out of the Healthy Living Pharmacy program as a vehicle to improve access to services. The comment is misleading since the HLP program works within the current commissioned service framework therefore a HLP pharmacy cannot offer more than any other contractor instead it offers the same but at a consistent standard.	From the HWB perspective service roll out will be preferable where there is evidence to support commissioning and where a consistent standard of delivery is guaranteed. External guidance to HWBs advises accordingly. Further clarification statement welcomed from the LPC.	Wording added "The HLP model, whilst providing an evidence base, is not a definitive measure or only pathway for improved quality"

Q5. Do you have any further comments?		
Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
There is no strategic planning for delivering primary care services across South Warwickshire. The growth in housing will push demand way beyond the current capacity of GPs. Where are the plans to integrate GPs and pharmacies into a co-ordinated service e.g. where the pharmacy can act as a triage prior to giving access to the GP.	As a potential Market Entry / contract performance issue, this should be picked up by the NHS England Area Team	No actions required
Please amend our opening times, with thanks	Details noted and clarification/confirmation sought from NHS England	Amendments made in line with advice from NHS England
The Worcestershire PNA consultation also found people are expressing difficulties accessing information about services, the range of services and when or where they are available.	The PNA references the need to encourage contractors to regularly update information on the NHS Choices website	LPC will encourage contractors to regularly update the NHS Choices website. No actions required within the PNA
Not received the document	Email notification included link to the document and appendices, no request made for hard copy	No actions required
Appendix 7C - Smoking Cessation Service Providers - The Co-operative Pharmacy, 21 High St, Stratford Upon Avon has not been included but the branch does offer this service	Details noted	The list was reviewed (pharmacy is listed as Dennis Marks/Co-op) List updated to read Co-operative Pharmacy (Dennis Marks) & commissioner notified
Appendix 7D - Supervised consumption Providers - The Co-operative Pharmacy, 14 High St, Bedworth is listed as offering this service but this is incorrect Please confirm that the appendices will be updated with the correct information prior to the final PNA being published	Details noted and clarification/confirmation sought from service commissioner	Pharmacy removed from the list and the commissioner notified

Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
<p>On p122 the PNA conclusion aims to direct the activities of the LPC. We would point out that the LPC is recognised by the Area Team and the PNA is not a tool for this purpose. Furthermore the conclusions are very descriptive over the opportunities for community pharmacy. We would prefer that these opportunities were determined by the readers of the document rather than the authors, the PNA should be an objective summary of provision vs need which contractors and commissioners can use to discuss future strategy.</p>	<p>Noted. Suggest amendment of wording on P.121 to read: Opportunities for community pharmacy: The LPC is encouraged to work with contractors to consider the findings of this PNA and the views of the public and patient respondents discussed in this report that relate directly to pharmacy contractors. The LPC is also encouraged to explore options for improving communications with the pharmacy contractor network to facilitate better engagement in the future.</p>	<p>Amended as proposed</p>
<p>Pharmacy Hours for Galley Common Contract FHG34 Core hours Mon - Fri 9am- 1pm and 2pm – 6pm Supplementary hours Mon – Fri 1-2pm and Saturday 9am- 1pm</p>	<p>Details noted and clarification/confirmation sought from NHS England</p>	<p>Amended as necessary</p>
<p>page 40 - SSLPC would question the reason for inclusion of transport/access question for dispensing practices where a similar assessment has not been documented for community pharmacies; a relevant assessment of access equivalent to that for community pharmacies would appear to be more appropriate.</p>	<p>Access to pharmaceutical services provided by community pharmacies has been covered thoroughly within the PNA</p>	<p>No actions required</p>
<p>page 41/42 – SSLPC's understanding of the NHS (Pharmaceutical Services and Local Pharmaceutical Services) Regulations 2013 description of Pharmaceutical Services provided by dispensing practices refers simply to the provision of dispensing of medicines, and does not include the additional services listed; in fact, many of those listed form part of General Medical Services, Local Enhanced services (LES), Directed Enhanced Services (DES) or other commissioned services. The conclusion of SSLPC is that this section should be deleted from this PNA as it the contents are not relevant to the publication of the PNA under current legislation.</p>	<p>The PNA Working Group acknowledged the Regulatory requirements of the PNA but agreed to include reference to other services, as appropriate, in order to provide a more useful commissioning tool, whilst noting the restrictions of services to be considered when making the assessment.</p>	<p>No actions required</p>

Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
<p>Page 71 – Reference is made to the increase in teenage pregnancy rates in North Warwickshire; SSLPC notes the relatively low number of pharmacies in this locality, and its proximity to Tamworth in Staffordshire. It may be possible that teenagers seeking Emergency Hormonal Contraception at Staffordshire pharmacies are not able to access the service free of charge as they are not Staffordshire residents, and are then unable to access a service within the Warwickshire boundaries. It may be that commissioners on both sides of HWB/commissioner borders need to consider how cross-border provision of services might help meet the needs of those attempting to access such a service.</p>	<p>The PNA acknowledges that pharmaceutical services will be accessed beyond the county boundaries, and this is reflected in the mapping</p>	<p>No actions required</p>
<p>Opening Times for store have since been changed to the following: Mon-Fri 8.30am -6pm Sat 9-1pm Change made since 5/1/2015</p>	<p>Details noted and updated</p>	<p>Amended as necessary</p>
<p>It is not stated that we are commissioned for needle exchange and supervised consumption. We do provide these services. Please could you amend the draft pna to reflect this</p>	<p>Details noted and clarification/confirmation sought from service commissioner</p>	<p>Amendments made in line with advice from service commissioner</p>
<p>our supplementary hours are also incorrect. We no longer open at 08.45, we open at 09.00am</p>	<p>Noted. Original times were as per contractor response, but opening hours have now changed</p>	<p>Amendments made</p>
<p>It was noted that some pharmacies were missing from the mapping</p>	<p>Locality maps to be updated</p>	<p>Locality maps updated</p>
<p>Mellors pharmacy is not listed as supervised consumption (provider) which we do</p>	<p>Details noted and clarification/confirmation sought from service commissioner</p>	<p>Amended as necessary following information received from commissioner</p>
<p>Mellors pharmacy is not listed as Ella one PGD accredited</p>	<p>Details noted and clarification/confirmation sought from service commissioner</p>	<p>Amended as necessary following information received from commissioner</p>
<p>I have just noticed a few errors on the PNA for Bilton pharmacy. I did attend the ELLA- ONE training meeting on the 9th October & we do provide ELLA-ONE (part of the EHC) Could you please correct this error</p>	<p>Details noted and clarification/confirmation sought from service commissioner</p>	<p>Amended as necessary</p>

Responders' Comments	Discussion (page numbers refer to draft document)	Actions (page numbers refer to draft document)
<p>I have just checked the details of our PNA and found a couple of errors. We currently provide the needle exchange service and it is not listed as we do.</p>	<p>Details noted and clarification/confirmation sought from service commissioner</p>	<p>Amended as necessary</p>
<p>Our opening hours are completely wrong also.</p> <p>The correct opening hours are : Monday 8am to 6.30pm Tuesday 8.30am to 6.30pm Wednesday 8.15am to 6.30pm Thursday 8.30am to 6.30pm Friday 8.30 to 6.30pm Saturday 9am to 5pm</p> <p>I would be grateful if you would update our records on the PNA.</p>	<p>Details noted and clarification/confirmation sought from NHS England</p>	<p>Amended as necessary</p>