

### Consultation Report

#### Introduction

As part of the PNA process there is a statutory provision that requires consultation of at least 60 days to take place to establish if the pharmaceutical providers and services supporting the population in the Health and Wellbeing Board (HWB) area are accurately reflected in the final PNA document, which is to be published by 1<sup>st</sup> April 2015. This report outlines the considerations and responses to the consultation and describes the overall process of how the consultation was undertaken.

#### Consultation Process

In order to complete this process the HWB has consulted with those parties identified under Regulation 8 of the NHS (Pharmaceutical and Local Pharmaceutical Services Regulations) 2013, to establish if the draft PNA addresses issues that they considered relevant to the provision of pharmaceutical services. Examples of consulted parties include: the LPC, LMC, Healthwatch, NHS Trusts, neighbouring HWB areas and those on the pharmaceutical lists.

In addition, other local stakeholders were invited to consult on the draft. These included patient groups and commissioners such as local CCGs. A list of organisations consulted is provided in the attached list.

Each consultee was contacted via a letter explaining the purpose of the PNA and that as a statutory party; the HWB welcomed their opinion on whether they agreed with the content of the proposed draft. They were directed to the Southampton City Council website to access the document and accompanying appendices, and offered the option of a hard copy if they wanted one.

Consultees were given the opportunity to respond by completing a set of questions and/or submitting additional comments. This was undertaken by completing the questions online, via a link or alternatively email, post or paper copy.

The questions were designed to assess the current provision of pharmaceutical services, have regard to any specified future circumstance where the current position may materially change and identify any current and future gaps in pharmaceutical services.

The consultation ran from 16<sup>th</sup> October 2014 until 18<sup>th</sup> December 2014.

#### Results

The online consultation received a total of 7 responses, which identified themselves as the following:

Answer Options	Response Percent	Response Count
On behalf of a pharmacy/dispensing appliance contractor	16.7%	1
On behalf of an organisation	83.3%	5
A personal response	0.0%	0
<i>answered question</i>		<b>6</b>
<i>skipped question</i>		<b>1</b>

This report outlines the considerations and responses to the consultation. It should be noted that participants in the consultation were not required to complete every question. As a result percentages are derived from the number of responses to the questions rather than the number of overall respondents.

### Summary of Online Questions, Responses and HWB Considerations

In asking the following questions:

**“Has the purpose of the PNA been explained sufficiently”;**

**“Has the scope of the PNA been explained sufficiently”;**

**“Are localities clearly defined throughout the draft PNA”;**

**“Does the PNA reflect the current provision of pharmaceutical services within Southampton City Council”;**

**“Has the PNA provided adequate information to inform market entry decisions”;**

**“Has the PNA provided adequate information to inform how services may be commissioned in the future”;**

the HWB appreciated the respondents’ wholly positive confirmation.

In asking **“Are there any gaps in the service provision; i.e. when, where and which services are available that have not been identified in the PNA”**, the HWB noted the majority of respondents confirmed there were no gaps in service provision. The remaining reply did not offer an explanation to what the gaps maybe.

In asking **“Does the draft PNA reflect the needs of the Southampton population”**, the HWB noted the majority (83.3%) of the respondents agreed the needs of the population were addressed. However, two comments were received and considered by the HWB, as shown below:

Comment:	Suggested HWB response
It would have been useful to have understood the provision of pharmaceutical services in relation to students and where the main areas of their accommodation are within Southampton as this is such a large group of people who potentially would access those services relating to smoking, sexual health etc.	The HWB confirmed that the student population formed part of the overall consideration. However, the comment does not identify a need not provided by the current provision identified within the PNA.
There are, however, additional services that could be commissioned to enhance service provision beyond need alone e.g palliative Care Service, Minor Ailments etc.	The HWB are mindful that such services are regularly reviewed however the comment does not identify a specific gap in service not currently met. However those identified services are commissioned from the CCG as shown in section 6.5 of the published PNA.

In asking “**Has the PNA provided enough information to inform future service provision and plans for pharmacies and dispensing appliance contractors**”, the HWB noted the majority of respondents’ positive confirmation however, one comment was received and considered by the HWB, as shown below:

Comment:	Suggested HWB response
However, the PNA is a document written to ensure that regulatory requirements are met. It does not talk about innovation, enhancement of service provision beyond need or reflect the pilots of service that organisations such as the AHSN are supporting	The HWB noted the comment concurred that the regulatory requirement was met. The other matters are not within the scope of the PNA.

In asking “**Are there any services that could be provided in the community pharmacy setting in the future that have not been highlighted**”, the HWB noted the majority of respondents confirmed there was not, however one comment was received and considered by the HWB as shown below:

Comment:	Suggested HWB response
Amongst others, the following could be provided: Brief Alcohol Intervention COPD; Atrial Fibrillation; Signposting to third sector & social services; Extend the number of Healthy Living Pharmacies providing a broad range of public health & wellness services & advice; Dementia support; Palliative care services; Minor (common) Ailment scheme; Repeat dispensing service; Anticoagulation services.	The HWB are mindful that such services are regularly reviewed and some are currently provided. However the comment does not identify a specific gap in service not currently met.

In seeking to establish whether the respondents agreed with the conclusions of the PNA, the HWB noted the majority (83.3%) concurred with no reasons as to why not given by those not in agreement. Respondents were asked if they had any further comments in addition to the questions asked, but no further comments were made.

### **Comments Received By Post and Email**

In addition to the on-line responses, the HWB received and considered the following responses:

By email, the Hampshire Health and Wellbeing Board expressed the view that the draft PNA “*needs to describe the services outside of Southampton that residents may use in Hampshire and how this affects access to services. In particular Section 5.2.1 describes the services outside of Southampton that a resident may use, this would benefit from some more detail. It would be beneficial to clarify that for some residents the nearest pharmacy will be outside of Southampton and located in the county of Hampshire*”:

In the HWB’s view, while appreciative of the comment, there is no further detail available other than potentially naming each pharmacy used in the Hampshire area, which will not add to the conclusions of the PNA.

### **Amendments**

During the consultation, the HWB received notification from NHS England of a relocation of the Lloyds pharmacy shown as index 42 on appendix M to the PNA. This was not considered significant and hence no changes to the conclusions of the draft PNA were required, other than amending appendix M accordingly as below:

Lloyds Pharmacy Ltd 1 Market Buildings Stoneham Lane Swaythling Southampton SO16 2HW	Lloyds Pharmacy Ltd Health Centre Southampton City Gateway Parkville Road Swaythling Southampton SO16 2JA
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The Clinical Commissioning Group commenced the commissioning of a Minor Ailments scheme with effect from 19<sup>th</sup> January 2015, which is reflected in section 6.6 of the published PNA.

The email response from the Hampshire Health and Wellbeing Board pointed out that at section 6.1 in incorrect in that “*Countess Mountbatten Hospital is located in Hampshire (outside of Southampton) not Southampton.*” The HWB amended the paragraph accordingly for the published PNA.

In addition to completing the online questionnaire, the LPC provided minor observations on the draft PNA for completeness. The HWB are grateful for the LPC’s time and considered their comments amending the PNA where relevant.

### **Summary Conclusions**

The HWB concluded that the majority of the responses were supportive of the draft PNA and the limited comments offered provided no reason to alter the conclusions for the final published PNA, albeit minor amendments were made as outlined in this consultation report.

## List of Consultees:

<b>Consultee</b>	<b>Type</b>
Southampton pharmacy contractors (see appendix M)	Statutory consultee
Local Pharmaceutical Committee (LPC)	Statutory consultee
Local Medical Committee (LMC)	Statutory consultee
Southampton Healthwatch	Statutory consultee
University Hospital Southampton NHS Trust	Statutory consultee
Solent NHS Trust	Statutory consultee
Southern Health NHS Foundation Trust	Statutory consultee
NHS England	Statutory consultee
Hampshire Health & Wellbeing Board	Statutory consultee
Portsmouth Health & Wellbeing Board	Statutory consultee
Wiltshire Health & Wellbeing Board	Statutory consultee
NHS Southampton Clinical Commissioning Group (CCG)	Statutory consultee
Age UK (Southampton)	Patient Group
Arthritis Care Southampton Group	Patient Group
Carers Together (Southampton)	Patient Group
Choices Advocacy	Patient Group
Chrysalis	Patient Group
Diabetes UK Southampton Group	Patient Group
EU Welcome	Patient Group
Expert Patients Programme	Patient Group
Hampshire Autistic Society	Patient Group
Keeping Pace with Pain	Patient Group
Macmillan Cancer support	Patient Group
MORPH	Patient Group
No Limits	Patient Group
Options Counselling	Patient Group
Parent Support Link	Patient Group
Society of St James	Patient Group
Solent Mind	Patient Group
Sonus	Patient Group
Southampton Learning Disability Partnership board	Patient Group
Southampton Mencap	Patient Group
Southampton Sight	Patient Group
Southern Health NHS Foundation Trust	Patient Group
Spectrumcil	Patient Group
The Rose Road Association	Patient Group
Thornhill Health and Wellbeing Network (THAWN)	Patient Group
Two Saints	Patient Group