

Consultation Report for Wokingham Borough Pharmaceutical Needs Assessment (2018 to 2021)

Introduction

This report outlines the formal consultation that took place, as part of the development of Wokingham Borough's Pharmaceutical Needs Assessment (PNA) for 2018-2021. This process meets the statutory requirements set out in [NHS \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013](#), which state that Health and Wellbeing Boards must formally consult specific organisations and local stakeholders about any draft PNAs for a minimum of 60 days.

This report:

- details how the consultation of Wokingham Borough's draft PNA was undertaken
- summarises the responses received
- Identifies actions taken to amend the final PNA, as a result of the consultation responses.

Consultation Process

Wokingham Borough's draft PNA report and supporting appendices were made publically available on Wokingham Borough Council's website from 1st November 2017 to 31st December 2017. Details about how to request paper copies of the report were also included on the website page. People were encouraged to take part in the consultation by responding to a short online survey, which was hosted by Bracknell Forest Council's Objective software. In addition, respondents could also contact Public Health Services for Berkshire (Berkshire Shared Public Health Team) directly by email or phone to make any comments.

The online survey included 11 questions with the opportunity to provide further comments and suggestions. The full survey can be seen in Appendix F.

In line with the [NHS \(Pharmaceutical and Local Pharmaceutical Services\) Regulations 2013](#), the following local organisations and key stakeholders were also specifically invited to respond to the consultation for Wokingham Borough:

- Neighbouring local authorities – Bracknell Forest Borough Council, Buckinghamshire County Council, Hampshire County Council, Oxfordshire County Council, Reading Borough Council, Royal Borough of Windsor and Maidenhead, West Berkshire Council
- Four Berkshire West Clinical Commissioning Groups (CCG) – Newbury & District CCG, North & West Reading CCG, South Reading CCG and Wokingham CCG
- The Local Pharmaceutical Committee (LPC) – Pharmacy Thames Valley
- The Local Medical Committee (LMC) – Berkshire, Buckinghamshire & Oxfordshire LMC
- Local pharmacy contractors and dispensing doctors
- Healthwatch Wokingham Borough
- Local NHS Foundation Trusts – Royal Berkshire NHS Foundation Trust, Berkshire Healthcare NHS Foundation Trust, Frimley Health NHS Foundation Trust

Appendix E: PNA Consultation Process and Feedback Report

Responses to the consultation were collated and analysed by Public Health Services for Berkshire, on behalf of the Health and Wellbeing Board. All responses were considered, reviewed and the PNA was amended as appropriate. A summary of the consultation responses, specific comments and actions taken are included below.

Results

A total of 21 responses were received as part of the formal consultation for Wokingham Borough's PNA. 20 of these were via the online survey and an additional one was by email. 11 members of the public responded. There was 1 response from a Health and Wellbeing Board member, 1 from a General Practice team member and 1 response from a community pharmacy team member. Organisation responses were also received from NHS England, the Local Pharmaceutical Committee, Berkshire West Clinical Commissioning Group Wokingham Borough Council's Health Overview and Scrutiny Committee (HOSC) and Wokingham Borough Council's Sustainable Communities Implementation Working Group (SCI). It is important to note that the consultation for Wokingham Borough's PNA was undertaken at the same time as the other 6 PNAs across Berkshire, so some of the responses received from organisations referred to the provision of pharmaceutical services across more than one HWB area.

Online response summary

This section provides a summary of the responses received through the online survey. Participants in the survey were not required to complete every question, so these do not always equal the total number of respondents. The survey also provided the opportunity to write specific comments. These have been considered later on in the report, as the comments often referred to several questions or provided general feedback about the PNA report or pharmaceutical service provision within Wokingham Borough, (see Table of Specific Comments on page 4).

Question	Responses		
	Yes	No	Not sure
Did you take part in the August 2017 survey?	1	19	0

A single respondent to the formal consultation had taken part in the earlier public survey, which was used to gain patient feedback to inform the development of the PNA.

Question	Responses		
	Yes	No	Not sure
1 Is the purpose of the PNA explained sufficiently within the draft PNA document (Section A)?	16	2	2
2 Does the document clearly set out the scope of the PNA (Section B)?	13	0	7
3 Does the document clearly set out the local context and the implications for the PNA (Section C)?	13	0	5
4 Does the information provide a reasonable description of the services which are provided by pharmacies and dispensaries in the local authority (Section D)?	14	2	2

Appendix E: PNA Consultation Process and Feedback Report

5	Are you aware of any pharmaceutical services currently provided which have not been included within the PNA?	2	13	5
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The majority of respondents stated that they thought the purpose of the PNA was explained sufficiently in the draft report and that the scope, local context and implications for the PNA were clearly set out. 2 members of the public stated that the purpose of the PNA was not explained sufficiently, however reasons for this were not given. 2 respondents also stated that the information provided did not include reference to delivery services and asked for these to be included in the final report. Pharmacies can choose to provide delivery services, however these are not commissioned by NHS England and are outside the scope of the PNA. More information for these comments is provided in the Specific comments section of this report (page 4).

Question		Responses		
		Yes	No	Not sure
6	Do you think the pharmaceutical needs of the population have been accurately reflected throughout the PNA?	12	4	4
7	Please indicate below if you agree with the conclusions for the services described (Section G):			
	Current necessary provision of pharmaceutical services	15	3	2
	Current gaps in pharmaceutical services	14	2	3
	Future gaps in pharmaceutical services	12	5	3
	Current additional provision of pharmaceutical services	13	3	2
	Opportunities for improvements and/ or better access to pharmaceutical services	14	2	4
	Impact of other services which affect the need for pharmaceutical service	15	2	2
8	Is there any additional information which you think should be included in the PNA?	5	12	1

The majority of respondents (12 of 20) thought that the pharmaceutical needs of the population had been accurately reflected throughout the PNA. The majority (12-15) also stated that they agreed with the conclusions for the different services described in Section G of the PNA Report. The remaining respondents did not agree with all the conclusions, or stated that they were not sure. Comments were provided for these reasons, such as the potential impact of changes to other NHS services on local pharmacy provision, the pressure of future housing developments and also the reliability of housing projection figures. These have all been addressed in the overall comments at the end of this report.

The LPC stated that they thought additional information should be included in the PNA around the types of services that the Health & Wellbeing Board would like to see commissioned from local pharmacies. These comments have also been addressed in the overall comments at the end of the report and incorporated into the final PNA.

Appendix E: PNA Consultation Process and Feedback Report

Question		Responses		
		Yes	No	Not sure
9	Has the PNA provided adequate information to inform:			
	Market Entry Decisions <i>(NHS England only)</i>	(7)	1	(5)
	How you may commission services from pharmacies in the future <i>(All commissioners)</i>	(8)	(1)	1 (4)
10	Does the PNA give enough information to help your own future service provision and plans? <i>(Pharmacies and dispensing appliance contractors only)</i>	1 (4)	(1)	(2)

Questions 9 and 10 in the online survey focussed on whether the PNA had provided adequate information to inform the commissioning of services from pharmacies, as well as if it gives pharmacies enough information to help them plan their future service provision. These questions were only relevant to certain organisations; however numbers in brackets in the table above show where questions were answered by other respondents.

NHS England stated that the draft PNAs across the 6 Berkshire HWB areas did not all provide adequate information to inform market entry decisions or how pharmacies may be commissioned in the future. NHS England specifically asked for more detailed information about the types and opening hours for services that may be needed in the Arborfield SDL in future. Additional information has been included in the final report, as requested.

Some other amendments were suggested and those relevant to Wokingham Borough's PNA have been addressed in the overall comments at the end of the report and incorporated into the final PNA, where appropriate.

Specific comments received

A total of 32 free text comments were completed from the 20 survey respondents for Wokingham Borough's PNA. These have been summarised and grouped below, with the response and actions taken. For clarity, some comments have been separated where there were multiple topics addressed within each comment.

Summary of Comments	Relevant survey questions	Response and actions taken
There was a comment from a member of the public concerned that the population was not adequately informed of the PNA or its relevance.	Q1, Q2, Q3, Q4	We are grateful to receive feedback from the public. A public survey of pharmacy users was undertaken as part of the process to develop the PNA. Feedback received through this survey is included in Section E of the final Report and helped to inform the conclusions. The consultation period was undertaken to gather public and stakeholder opinion about the accuracy and relevance of the document,

Appendix E: PNA Consultation Process and Feedback Report

Summary of Comments	Relevant survey questions	Response and actions taken
A member of the public found it difficult to understand the PNA.	Q1, Q2, Q3	<p>We are grateful to receive feedback from the public and regret difficulty understanding the document.</p> <p>The PNA was reviewed prior to the consultation process to ensure that it was as accessible as possible. Key summary page was also included at the beginning of the document, which used jargon-free, non-technical language. An Equality Impact Assessment was undertaken to assess if there was any limitations to access that could have been mitigated. This is included at Appendix D.</p>
A member of the public felt that the data used in the PNA was out of date.	Q2, Q3, Q4, Q6, Q8	The latest available data was used in the writing of the PNA. Due to the length of the formal consultation period, initial drafts were completed several months ago and more up-to-date data may have been made available since.
The Health and Overview Scrutiny Committee (HOSC) and Sustainable Communities Implementation Working Group (SCI) suggested that the PNA could be improved with more information about the delivery services offered by community pharmacies within the Borough.	Q4, Q5, Q6	Delivery services are mentioned in this report and it is acknowledged that they improve access to pharmaceutical services for many. However, in NHS legislation, delivery services are not a pharmaceutical service and are therefore outside of the scope of the PNA. Individual pharmacies can choose to provide this service privately.
A GP highlighted that dispensing doctors offer dispensing review of use of medicines (DRUMs) as part of their service,	Q5	<p>Agree that this should have been included.</p> <p>This has now been included in the final PNA report.</p>
The PNA should acknowledge that Hampshire residents may use pharmaceutical services in areas bordering the county to better assess provision.	Q6, Q8	The scope of the PNA focuses on residents living within Wokingham and the pharmaceutical services that they have access to. However, an additional comment has been added into the PNA to clarify that people living outside of the area may also use these services.

Appendix E: PNA Consultation Process and Feedback Report

Summary of Comments	Relevant survey questions	Response and actions taken
There were comments from the LPC, HOSC, SCI and NHS England regarding housing developments in the Borough.	Q6, Q8	<p>Agreed that additional pharmacy provision is required in the Arborfield development and that extended opening hours may be needed in the Shinfield Parish SDL sites. We were pleased to receive support for this conclusion from multiple sources.</p> <p>The PNA was amended to better quantify the amount of development and therefore the amount of additional pharmacy provision required to meet the future unmet need in Arborfield and Shinfield Parish SDLs. Other SDL sites were also reassessed and concluded that no additional services were needed.</p>
A comment was made concerning the assessment of the lack of evening and weekend services in the rural areas of Remenham, Wargrave and Ruscombe. Respondent acknowledged that this was mitigated by use of pharmacies in neighbouring wards, as stated in the PNA conclusions.	Q7	<p>We were pleased to receive a comment in support of the assessment.</p> <p>An amendment to the PNA was made to better describe which neighbouring pharmacies are used.</p>
Suggested revision to describe the Flu service commissioning more clearly	Q8	Final PNA was revised to clarify that the Flu service is commissioned annually.
The LPC commented that they would benefit from an indication of what services the Health & Wellbeing Board would like to commission from pharmacies to guide future developments.	Q8, Q10	HWB to discuss further and inform LPC of any future services that may be commissioned from pharmacies in the future.
A comment expressing concern for potential underfunding of services.	Q8	We were grateful to receive feedback from the public. The document is an objective assessment of the pharmaceutical needs of the area and does not comment on the funding required to deliver these services, which are the responsibility of NHS England.
A comment expressing need for additional general practices and pharmacies in the Wokingham area	Q10	We were grateful to receive feedback from the public. Our assessment identified future unmet need in the Arborfield area. The PNA does not consider general practice provision.

Appendix E: PNA Consultation Process and Feedback Report

Responses received by other methods

A joint response from the Berkshire West Clinical Commissioning Groups was also received by email.

Summary of Comments	Response and actions taken
Concerns raised about the effect of future housing developments in some specific areas of Berkshire, including the Arborfield SDL.	<p>This reflected the responses received by NHS England, the LPC, the Health and Overview Scrutiny Committee (HOSC) and Sustainable Communities Implementation Working Group (SCI). Agreed that additional pharmacy provision is required in the Arborfield development and pleased to receive support for this conclusion from multiple sources.</p> <p>The PNA was amended to better quantify the amount of development and therefore the amount of additional pharmacy provision required to meet the future unmet need in Arborfield and Shinfield Parish SDLs. Other SDL sites were also reassessed and concluded that no additional services were needed.</p>
Provided information about the potential changes in local health services, which could impact on pharmacy service provision. These include the national consultation on prescription of low value medicines.	<p>The information provided has been included in section C2 and conclusion G6 of the final PNA Report. The PNA has been amended to recognise that some of these changes, and the possible impacts, are unknown and can therefore not be quantified in the PNA. It is also recognised that the timeframe for some changes is not yet clear. Generally, planned changes to NHS services in the lifetime of the PNA are not expected to create demand for additional pharmaceutical services in the Wokingham Borough.</p>
Highlighted the Berkshire West CCGs Palliative Care dispensing scheme for emergency drugs	<p>This provision was added to section D1 of the final PNA to better reflect locally commissioned services.</p>

Following the Equality Impact Assessment Screening, the PNA Steering Group also decided to add some additional information into Section C of the final PNA, which highlighted the different health outcomes observed by certain groups of people. While this had been included in the draft report, it was felt that the different prevalence and mortality rates for people of different protected characteristics needed to be more explicit in the final report. The full Equality Impact Assessment Screening report is attached at Appendix D.

Conclusion

The consultation process was effective in receiving scrutiny for the PNA from the healthcare workforce. We were pleased to also receive feedback from members of the public, and are confident that together with the stakeholders who replied the concerns of local residents were represented.

All comments were gratefully received and were used to improve the accuracy and quality of the PNA.

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