

# Appendix H

## Consultation Responses

## 1. Accuracy

One pharmacy raised an issue of accuracy in relation to opening hours:

Organisation	Suggested Inaccuracy	PNA Steering Group Decision	PNA Amended?
Earls Hall Pharmacy 8 Earls Hall Parade, Southend-on-Sea, Essex SS2 6NW	<ul style="list-style-type: none"> <li>Pharmacy only closes at 18:00 on a Wednesday</li> <li>The closing time is 18:30 on all other weekdays</li> </ul>	<ul style="list-style-type: none"> <li>Inaccuracy noted</li> <li>Update Appendix E - Opening Hours</li> <li>Noted that the inaccuracy has no impact upon the analysis or conclusions</li> </ul>	Yes

## 2. Detailed Comments

This section sets out the detailed comments which were received during the formal consultation and summarises the response of the PNA Steering Group.

The section has been organised in accordance with the specific questions asked within the response template which, which can be found in Appendix G of the PNA.

For each question, we summarise the percentage of respondents who either agreed, disagreed or were not sure with respect to the information contained within the PNA; noting that respondents who did not answer a given question and those that did not return the feedback response form were excluded from this analysis. We then list the specific comments received and set out the PNA Steering Group decision noting whether or not the PNA has been amended. Where no specific comments were received in relation to a question then we explicitly state this.

1. Has the purpose of the PNA been explained sufficiently (PNA Section 1.1)?			
Yes = 100% (n=13)	No = 0%	Not sure = 0%	Not answered / Feedback Form Not Used (n=2)
Organisation	Suggested Inaccuracy	PNA Steering Group Decision	PNA Amended?
No detailed comments received			

2. Does Section 1.3 of the PNA clearly set out the scope?			
Yes = 90.9% (n=10)	No = 0%	Not sure = 9.1% (n=1)	Not answered / Feedback Form Not Used (n=4)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
No detailed comments received			

3. Does Section 2 clearly set out the local context and implications for the PNA?			
Yes = 70% (n=7)	No = 20% (n=2)	Not sure = 10% (n=1)	Not answered / Feedback Form Not Used (n=5)
	Detailed Comment	PNA Steering Group Decision	PNA Amended?
No detailed comments received			

4. Does the Information in Section 3.1 and 3.2 provide a reasonable description of the services which are provided by pharmacies and DACs?			
Yes = 66.6% (n=6)	No = 33.3% (n=3)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=6)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
Essex LPC	<p><b>Signposting, Healthy Lifestyles &amp; public health campaigns</b></p> <p>There is no discretion within pharmacy regulation for HWBs to run alternative health promotion campaigns, any campaigns other than those requested by NHS England would need to be commissioned separately</p> <p>Page 21, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment relates to the following statement: “NHS England sets the health promotion campaigns although HWBs have discretion to run alternative campaigns”</li> <li>▪ The PNA Steering Group acknowledged that health promotion is an essential service and that NHS England set the campaigns nationally</li> <li>▪ Whilst the HWB may potentially influence the national campaigns through NHS England membership on the HWB, there is a need for additional campaigns to be run through pharmacy, which are reflective of local health needs and behaviours</li> <li>▪ It was agreed to change the word alternative to additional</li> </ul>	Yes
Essex LPC	<p><b>Opening hours and access</b></p> <p>The focus is on the implications for access if a pharmacy chooses to reduce its supplementary hours, however this flexibility may also allow for extension of hours, for example as other primary care providers move to 7-day service provision. It is possible that pharmacies will choose to respond to increased GP opening hours without a need for additional hours commissioning by NHS England.</p> <p>Page 25, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment relates to the following statement: “...Supplementary hours may be changed at the discretion of the contractor, providing that NHS England is given 90 days’ notice. This has implications for access if a pharmacy chooses to reduce its supplementary hours”</li> <li>▪ The PNA Steering Group agreed with the comment and agreed to remove <i>This has implications for access if a pharmacy chooses to reduce its supplementary hours</i>”</li> </ul>	Yes

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
Essex LPC	<p><b>Opening Hours</b> Opening hours (page 36) - Again with reference to opening hours, it is possible that pharmacies will choose to respond to increased GP opening hours without a need for additional hours commissioning by NHS England.</p> <p>Page 36, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment relates to the following statement: <i>“With respect to future gaps, when GPs move towards providing a 7 day a week service, we would anticipate that NHS England will seek to commission additional hours from the existing network of pharmacies to ensure good alignment with GP opening hours”</i></li> <li>▪ The PNA Steering Group agreed with the comment and agreed to amend the text as follows: <i>“If GPs move to a 7 day service, additional hours may be required to ensure that our residents continue to secure timely access to the medicines they need”</i></li> </ul>	Yes
Essex LPC	<p><b>Future capacity</b> The average number of items per pharmacy per month is a meaningless indicator, as it does not take into account opening hours, numbers of pharmacists and dispensing support staff. GP capacity looks at registered patients per GP, not per practice.</p> <p>Page 34, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment relates to section 3.2.1.3 “Dispensing Future Capacity” and refers to the analysis which looks at the average number of items per pharmacy</li> <li>▪ The PNA Steering Group was advised that items/ pharmacy is a commonly used indicator, within PNAs, which is used to assess capacity within pharmacies</li> <li>▪ It was acknowledged that there are no alternative robust indicators, nor is there a national dataset for pharmacy staffing</li> <li>▪ The PNA Steering Group held the view that it is helpful to include a measure of future capacity and determined that no changes would be made to this section of the PNA</li> </ul>	No
Essex LPC	<p><b>Age and Disability</b> Multi-compartment compliance aids are not funded by the NHS for patients at all on the basis of age, and may only be funded to support those with a disability if this is assessed to be the auxiliary aid which best meets their needs</p> <p>Page 35, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment refers to “meeting the needs of those with a protected characteristic”</li> <li>▪ The PNA Steering Group agreed with the comment that multi-compartment compliance aids are not funded on the basis of age and agreed to remove this example</li> <li>▪ It was agreed to retain this as an example of support under disability but to change memory impairment to cognitive impairment</li> </ul>	Yes
Essex LPC	<p><b>Access and disability</b> NHS England must consider applications on the basis of the tests in the regulations, normally this would not include access and support for those with disabilities unless the basis of the application was that those with</p>	<ul style="list-style-type: none"> <li>▪ The comment refers to the following statement: <i>“We would anticipate that NHS England will explore access and support for those with disabilities when considering applications”</i></li> <li>▪ The PNA Steering Group agreed to remove the comment</li> <li>▪ The emphasis of the section will be changed to set out</li> </ul>	Yes

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
	<p>disabilities had difficulty accessing services in the area (regulation 18(2)(b)(ii)).</p> <p>Page 37, Draft PNA</p>	<p>the requirements of the Equality Act 2010; and to describe how improvements could be achieved</p>	
Essex LPC	<p><b>Meeting the needs of those with protected characteristics</b></p> <p>Ensuring medicines are appropriate and safe to be taken by pregnant or breastfeeding women forms part of the terms of service for the Dispensing essential service.</p> <p>Page 42 and 46, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The LPC clarified that the comment relates to the MUR and NMS service</li> <li>▪ The PNA Steering Group agreed that such advice related to essential services and agreed to remove this from the “meeting the needs of those with protected characteristics”</li> </ul>	Yes
Essex LPC	<p><b>Meeting the needs of those with a protected characteristic NMS</b></p> <p>The new medicine service is only provided to patients prescribed a medicine for a limited number of conditions, for the first time. Older people on multiple medications for long term conditions will only benefit from the service if their medication changes.</p> <p>Page 46, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ Comment refers to the following statement: “<i>Older people on multiple medications for long term conditions may benefit from the NMS...</i>”</li> <li>▪ The PNA Steering Group agreed to amend the wording as follows: “<i>Older people, particularly those taking multiple medicines, starting an eligible new medicine may benefit...</i>”</li> </ul>	Yes
Essex LPC	<p><b>Sexual Health</b></p> <p>Since April 2013 there have been some administrative challenges with the locally commissioned services, in particular with regard to PGD eligibility, in that the commissioners have required copies of certificates for a programme that is no longer provided. This may explain the apparent low take up of services in 2013/4, and is yet to be resolved.</p> <p>Page 63, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment refers to the “Activity and Performance “ overview section, which identifies that only one of the 18 pharmacies commissioned to provide the service, undertakes any appreciable activity</li> <li>▪ The PNA Steering Group noted that the “Future” box sets out a commitment to redesign and integrate sexual health services and that reasons behind low activity will be explored as part of this work</li> <li>▪ The LPC comment was noted but no changes will be made to the PNA</li> <li>▪ A error in the title of activity table was noted and it was agreed that this would be amended</li> </ul>	Yes
Essex LPC	<p><b>Needle and Syringe Programme overview</b></p>	<ul style="list-style-type: none"> <li>▪ The comment refers to the following statement “<i>This service involves the provision of clean injecting</i>”</li> </ul>	Yes

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
	<p>This service provides clean injecting equipment AND encourages return of used needles and syringes, but clean equipment is not only provided “in exchange” for used equipment as implied by the first sentence.</p> <p>Page 64, Draft PNA</p>	<p><i>equipment in exchange for used needles and syringes”</i></p> <ul style="list-style-type: none"> <li>▪ The PNA Steering Group agreed to the proposed amendment</li> </ul>	
Essex LPC	<p><b>Needle and Syringe Programme - future</b></p> <p>Potential service developments include blood-borne virus testing and immunisation, steroid packs and naloxone kits.</p> <p>Page 67, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment refers to the “Future” Box which states <i>“Potential service developments include: Alcohol IBA; Blood-borne virus testing”; Reference is made to hepatitis B vaccination as a potential future service development within the ‘Looking to the Future’ section of the PNA</i></li> <li>▪ The DAT has confirmed that there is an ambition to develop a PGD for naloxone and make this available alongside needle exchange. However, it is unlikely that this service development will be introduced in 2014/15</li> <li>▪ There are no firms plan for community pharmacy supply of steroid packs at this point in time and no reference will be made to this within the final PNA</li> <li>▪ The final PNA will be amended so that immunisation and naloxone are highlighted as potential future developments</li> </ul>	Yes
Essex LPC	<p><b>Supervised Consumption - Overview</b></p> <p>Leave out specific names of substitute medication to allow for greater flexibility.</p> <p>Page 71, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment refers to the following statement in the “Overview” box <i>“It involves the pharmacist supervising the consumption of the substitute medicine (methadone, naltrexone, suboxone or buprenorphine) to ensure the patient is complying with their treatment”</i></li> <li>▪ The DAT has advised that it wishes the final PNA to state the specific names of the opiate substitute medication</li> </ul>	No

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
Essex LPC	<p><b>Supervised Consumption - Conclusions</b></p> <p>Collection and supervision times should be negotiated with the client as part of the three-way agreement, this will include days and times when the service is not available and arrangements for those days.</p> <p>Page 71, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment has been made in the context of the current gaps in service</li> <li>▪ It was agreed that this statement would be included within the final PNA</li> <li>▪ The PNA Steering Group also determined to amend the recommendation within the 'further provision' box as follows: <i>"In the short term, approaching our existing network of pharmacies (particularly the 100 hour pharmacies and those which open for extended hours), will assist with improving access particularly on weekday and Saturday evenings; and on Sundays"</i></li> </ul>	Yes
Howells & Chana Chemists 72 West Road, Shoeburyness Essex, SS3 9DS	<p><b>Maps and non-pharmacy providers</b></p> <p>Map 1 has missing GP surgery locations. For example, Shoebury Health Centre next to Pharmacy 14 in Shoeburyness Ward is not shown. A comparison with Map 10 shows several other surgeries that should be added to Map 1 for completeness.</p>	<ul style="list-style-type: none"> <li>▪ Map 1 is the template which was used as the starting point to create all maps within the PNA</li> <li>▪ The same GP premises are shown on all maps.</li> <li>▪ Where a pharmacy is in close proximity to a GP surgery, the pharmacy is given priority on the map and may obscure the GP surgery</li> </ul>	No
<p>Kalsons Chemist 138 Hobblythick Lane, Westcliff-on-Sea, Essex, SS0 0RJ</p> <p>Earls Hall Pharmacy 8 Earls Hall Parade, Southend-on-Sea, Essex SS2 6NW</p>	<p><b>Appliances (AURs / SACs) - Conclusions</b></p> <p>The knowledge and awareness of patients is limited on the pharmacy being enabled to provide this service.</p> <p>Patient appliance use is initiated in hospital and then referred on to the manufacturers who supply to patients directly</p> <p>Page 49 &amp; Page 52, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comments refer to the conclusions for the AURs and SACs services</li> <li>▪ The PNA Steering Group agreed that these points should be included in the final PNA; and that the order of the bullet points should be switched</li> </ul>	Yes

5. Are you aware of any pharmaceutical services currently provided which have not been included in the PNA?				
Yes = 22.2% (n=2)		No = 77.8% (n=7)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=6)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?	
Howells & Chana Chemists 72 West Road, Shoeburyness, Essex, SS3 9DS	<b>Provision of Minor Ailments service.</b>  This service was well received by Howells and Chana customers until it was withdrawn in July 2010. The service had freed up doctors time considerably. Consideration should be given to rolling out this service, perhaps even at a national level as there is a local need generally in Southend. The service should be for all, rather than being limited to only those on Family Credit.	<ul style="list-style-type: none"> <li>▪ This comment relates to a service which was commissioned in the past</li> <li>▪ The minor ailments service is not currently commissioned and the CCG and NHS England have no plans to do so</li> </ul>	No	
Kalsons Chemist 138 Hobblythick Lane, Westcliff-on-Sea, Essex, SS0 0RJ  Earls Hall Pharmacy 8 Earls Hall Parade, Southend-on-Sea, Essex SS2 6NW	<b>Private PGDs</b>  Private PGDs for supply of items such as malaria prophylaxis, hair loss treatment, erectile dysfunction treatment etc. Various pharmacies provide this service outside of the NHS and these services could be incorporated into the NHS needs assessment if this meets population needs	<ul style="list-style-type: none"> <li>▪ This comment relates to non-NHS services</li> <li>▪ Non-NHS services are excluded from the scope of the PNA because they cannot be taken into account when considering applications to provide pharmaceutical services</li> <li>▪ An appendix provides an overview of non-NHS services within the PNA</li> </ul>	No	

6. Do you think the pharmaceutical needs of the population have been accurately reflected in the PNA?				
Yes = 77.8% (n=7)		No = 11.1% (n=1)	Not sure = 11.1% (n=1)	Not answered / Feedback Form Not Used (n=6)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?	
Howells & Chana Chemists 72 West Road, Shoeburyness, Essex, SS3 9DS	Addition of a minor ailments service should be considered	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group noted that minor ailments services have been commissioned in other areas to promote “pharmacy first” and to reduce demand for GPs (and to a lesser extent use of unscheduled care providers)</li> <li>▪ It was noted that the primary care strategy was considering a broader scope around self-care and that such a service is being considered elsewhere</li> </ul>	No	

7. Do you agree with the conclusions for Essential Services?			
Yes = 100% (n=8)		No = 0% (n=0) Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
NHS England - Essex Area Team	<p><b>Opening hours</b></p> <p>After 4.30pm on Sunday although there may be pharmacies open in Castle Point if Southend doesn't have cover</p>	<ul style="list-style-type: none"> <li>▪ NHS England confirmed that this comment relates to retail trading law within the UK which restricts supermarket opening hours</li> <li>▪ The PNA Steering Group noted that several pharmacies, within Southend-on-Sea, open beyond 4:30pm on a Sunday, including one which is open until 11pm</li> </ul>	No
NHS England - Essex Area Team	<p><b>Distribution of pharmacies</b></p> <p>How does this compare with other Essex or nationally?</p> <p>Page 23, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment relates to the table looking at the distribution of pharmacies, including the number of pharmacies per 100,000 population</li> <li>▪ It was noted that the benchmarking graph, on the previous page, provides comparative information for East of England and England</li> <li>▪ Essex is not available in the national dataset</li> </ul>	No
NHS England - Essex Area Team	<p><b>Benefits of Repeat dispensing</b></p> <p>I don't believe it facilitates the delivery of a wider range of services because of greater predictability of workload, workload is considerably increased, transferred from GP to pharmacy.</p> <p>Page 32, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment relates to the statement: "<i>Greater predictability in workload for pharmacies which facilitates the delivery of a wider range of pharmaceutical services</i>"</li> <li>▪ The PNA Steering Group was advised that a national evaluation of repeat dispensing by community pharmacists reported that the overall dispensing time for batch issues compared to normal prescriptions reduced by approximately 2 hours per 1,000 prescriptions</li> <li>▪ Reference: "<i>Dispensing with Repeat: A Practical Guide to Repeat Dispensing</i>" - National Prescribing Centre, 2008</li> </ul>	No

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
<p>NHS England - Essex Area Team</p>	<p><b>Bank holidays</b>  I though there is no requirement to notify change to supplementary hours on a public holiday. It also implies that NHS England do not give any consideration to pharmacy opening – this is not correct – e.g. Xmas.</p> <p>Page 25 &amp; 36, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment relates to the statement: <i>“Bank Holidays, where pharmacies may notify NHS England of an intention to close (through a variation in supplementary hours) and there is no rota service. 27% of respondents in our public survey were dissatisfied or very dissatisfied with Bank Holiday opening hours”</i></li> <li>▪ The PNA Steering Group was advised: <ul style="list-style-type: none"> <li>○ Pharmacies not required to open on Bank Holidays</li> <li>○ The NHS Regulations provide that Good Friday, Easter Sunday and Christmas day are always treated in this way</li> <li>○ However, for the other days the status of the day depends on whether it has been formally declared as a bank holiday or whether a substitute day has been introduced e.g. if New Year’s Day and Boxing Day fall at the weekend there may be substitute days declared, meaning that the pharmacy might have to open on the 26 December / 1 January where these fall on a weekend</li> <li>○ Pharmacies are not obliged to tell NHS England if they intend to open on bank holidays but are encouraged to do so</li> </ul> </li> <li>▪ It was agreed that the PNA would be revised in the light of the above information as follows:  <i>“There is no obligation for pharmacies to open on bank holidays. However, NHS England is obliged to ensure NHS Pharmaceutical Services are available and to commission pharmacies to open if deemed to be necessary. An enhanced service is commissioned for Christmas Day and Easter Sunday”</i></li> </ul>	<p>Yes</p>

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
NHS England - Essex Area Team	<p><b>Opening hours</b></p> <p>Saturdays – Eastwood [Park] Ward – either incorrect or not taking into account a pharmacy just on the border – Morrisons Eastwood. Pertinent to consider neighbouring locality as it changes picture.</p> <p>Page 36, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group noted the error in that one pharmacy was open on Saturday mornings and agreed for the PNA to be amended</li> <li>▪ The PNA steering group noted that the overall conclusion stated <i>“However, the geography of the area is such that even on a Sunday the vast majority of residents are in a position to access pharmacy services, either within Southend-on-Sea or across the border in the neighbouring HWB area, within a reasonable timescale”</i> and agreed that the error had no material impact upon this</li> </ul>	Yes
NHS England - Essex Area Team	<p><b>Premises and consultation areas</b></p> <p>CCTV versus privacy?</p> <p>Page 38, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment refers to a statement which suggests that there are opportunities to improve security through the use of CCTV and panic buttons</li> <li>▪ It was noted that the council was considering whether or not CCTV should be a requirement for substance misuse services and that this was about protection for the pharmacist / staff in the event that there were difficult encounters / abusive encounters</li> <li>▪ Providing that CCTV is used in a transparent way (as opposed to covert, hidden cameras) then no issues of privacy arise</li> <li>▪ The PNA Steering Group agreed to note the comment</li> </ul>	No

7. Do you agree with the conclusions for MURs?			
Yes = 75% (n=6)	No = 25% (n=2)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
Howells & Chana Chemists  72 West Road, Shoeburyness Essex, SS3 9DS	<p>Disagree that with no Saturday night/Sunday opening hours there is a “significant gap” for people with long term condition who work full time to have an MUR.</p> <p>Howells &amp; Chana have an appointment system to accommodate customers who experience such a difficulty, our opening hours being 9 am until 7pm weekdays and until 5pm on Saturdays.</p> <p>Customers have taken this offer and a second pharmacist has come in at the appointed time specifically to satisfy this need to carry out an MUR. Thus there is no gap as such, certainly not “a significant gap”; it is a matter of managing specific customer need.</p> <p>Page 42, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comments relate to the conclusions box which highlight the following points: <ul style="list-style-type: none"> <li>○ Limited access to pharmacies at certain times of day may cause constraints</li> <li>○ The fact that people can’t attend an alternative pharmacy e.g. when their own pharmacy is closed or where a pharmacy doesn’t offer the service is a significant gap because they can’t choose to go elsewhere</li> </ul> </li> <li>▪ The PNA Steering Group noted that not all pharmacies open for extended hours (in the same way as Howells &amp; Chana Chemists do) and some pharmacies don’t have a second pharmacist (although this can’t be quantified because this question was not asked in the questionnaire)</li> <li>▪ The PNA Steering Group noted the comments</li> </ul>	No
NHS England - Essex Area Team	<p><b>Activity data for MURs</b></p> <p>MURs – lower than 188 per pharmacy – can you check the figures on this please we don’t think this is right?</p> <p>Page 39 &amp; 42 - Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group was advised that the benchmarking data in the graph refers to 2012/13 and that the Business Services Authority website had been used as the data source for Southend-on-Sea. The total number of pharmacies is used as the denominator in the national dataset and this was replicated for Southend-on-Sea. The figures have been checked and are correct.</li> <li>▪ NHS England provided data for 2013/14 which show a higher rate of MURs; however, it would not be appropriate to use this for comparison purposes as the timeframe is different. Also, the rate of MURs decreases to 204 if all 39 pharmacies which offer the service are taken into account</li> </ul>	

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
<p>Kalsons Chemists 138 Hobleythick Lane, Westcliff-on-Sea, Essex, SS0 0RJ</p> <p>Earls Hall Pharmacy 8 Earls Hall Parade, Southend-on-Sea, Essex SS2 6NW</p>	<p>MURs are relative to number of patients coming into the pharmacy which is dependent on the nearest GP surgery/ies, number of competing pharmacies in the area serving a practice and location of pharmacy relative to GP practice hence it is correct to aim for more.</p> <p>However it will be important to note that unless these can be provided within a patient's home then numbers may remain low due to the collect/delivery service offered by pharmacies along with the issues mentioned above.</p> <p>Please note the new areas listed for targeted MURs.</p> <p>Page 39 &amp; 42, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group noted the comments and agreed to the following amendments: <ul style="list-style-type: none"> <li>○ In the overview box, note that pharmacies may seek permission from NHS England to provide MURs in the domiciliary setting</li> <li>○ Update the overview box with the new target and areas listed for MURS (70% of MURs to be directed at target groups, which now also includes people on 4 or more medicines who have CVD or who are at risk of CVD)</li> <li>○ In the further provision box, note that providing MURS in the domiciliary setting may improve access for people who are less able to visit pharmacies</li> </ul> </li> </ul>	Yes

7. Do you agree with the conclusions for the NMS?			
Yes = 100% (n=8)	No = 0% (n=0)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
No detailed comments received			

7. Do you agree with the conclusions for AURs and SACs?				
AURs:	Yes = 71.4% (n=5)	No = 28.6% (n=2)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=8)
SACs:	Yes = 85.7% (n=6)	No = 14.3% (n=1)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=8)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?	
<p>Kalsons Chemist 138 Hobleythick Lane, Westcliff-on-Sea, Essex, SS0 0RJ</p> <p>Earls Hall Pharmacy 8 Earls Hall Parade, Southend-on-Sea, Essex SS2 6NW</p>	<p><b>AURs</b> Can be provided however too many patients have little knowledge of their choices such as specialist contractors providing the service along with their local pharmacies. Pharmacists can develop the skill only if the opportunities to deliver the service would arise, which is rare.</p> <p>Page 47, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ PNA Steering Group noted comment</li> <li>▪ PNA updated to reflect issues with patient awareness of pharmacy based services and choice as per previous comment (refer to question 4)</li> </ul>	Refer to comments made in response to 4	
Online ID: 6032967	<p><b>AURs and SACs</b> As this is a specialised services requiring a separate or fairly large area for stocking these appliances it is difficult to provide these services in a normal pharmacy</p> <p>Page 47 - 52, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ PNA Steering Group noted comment but was made aware that such products can be ordered on receipt of a prescription rather than being held in stock</li> </ul>	No	
NHS England - Essex Area Team	<p><b>AUR and SACs</b> Implies that pharmacies are not willing to provide more service and makes no mention of patient choice and intense marketing from main suppliers from outside the area.</p> <p>Page 47 - 52, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ PNA Steering Group noted the comments</li> <li>▪ PNA updated as previously stated</li> </ul>	Refer to comments made in response to 4	

7. Do you agree with the conclusions for Seasonal Influenza Vaccine?			
Yes = 87.5% (n=7)		No = 12.5% (n=1)	Not sure = 0% (n=0)    Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
LPC	Seasonal influenza service conclusions depend on influencing NHS England commissioners  Page 53, Draft PNA	<ul style="list-style-type: none"> <li>The LPC confirmed that they agreed with the conclusions but were highlighting that NHS England needed to be influenced as the commissioner</li> <li>The PNA Steering Group noted the comment</li> </ul>	No
NHS England - Essex Area Team	Flu vaccination – needs update or reference the fact that this is an increasing area of service provision and the numbers will change depending on commissioning arrangements and possible inclusion of willing and able to provide numbers.  Page 53 & 54, Draft PNA	<ul style="list-style-type: none"> <li>PNA Steering Group noted the comment</li> </ul>	No
North & South Essex LMCs Ltd	<p>The LMC sent a letter raising the following concerns with respect to the pharmacy-based seasonal influenza vaccination service:</p> <ul style="list-style-type: none"> <li>The NHS England letter of 2nd May 2014 stated “In 2015-2016 as well as the under 65’s at-risk and pregnant women, we will pilot pharmacies vaccinating the over 65’s in areas where practices do not reach their national targets”. This shows a fundamental misunderstanding of the problem</li> <li>GP surgeries have run exceptional services over the last few years, including evening and weekend clinics, as well as encouraging patients to attend for vaccination by letter, phone and text. The problem lies with a lack of demand and with patients being indifferent about it, despite many requests to attend by surgeries. Additionally, frequent news articles doubting the effectiveness of the flu vaccine have impacted on up-take of the vaccine.</li> <li>It is the view of the CRG that adding more providers will only confuse matters further, sending the service into decline and that</li> </ul>	<ul style="list-style-type: none"> <li>The PNA Steering Group noted that the historically low uptake of seasonal influenza vaccine and that the pharmacy-based service improves choice and access to seasonal influenza vaccination for residents of Southend-on-Sea</li> <li>It was acknowledged that it would be valuable for general practice and pharmacy to work together to look at how to increase uptake rates</li> <li>NHS England is the commissioner and the PNA Steering Group advised that the issues raised within the LMC letter need to be addressed by NHS England</li> <li>It was agreed that the ‘futures box’ would be updated to read: <i>“Given Southend-on-Sea’s historically low uptake of seasonal influenza vaccine in all ‘at risk’ groups, we would wish to see NHS England commissioning appropriate services, through a range of providers, in order to increase uptake for all eligible patients, irrespective of age”</i></li> </ul>	Yes

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
	<p>additional resources would have been better spent on a public information campaign to increase patient awareness. Figures obtained from NHS England show that 92% of patients who had a flu jab in the pharmacy pilot last year (from the 90% that completed the survey) had previously unable to vaccinate the hard to reach population.</p> <ul style="list-style-type: none"> <li>▪ The extension of the scheme also brings other problems:- <ul style="list-style-type: none"> <li>○ Surgeries no longer know how many vaccines to order.</li> <li>○ There will be less point in surgeries sending recall letters when the patient is more likely to get their vaccination from a pharmacy.</li> <li>○ There will be extra administration in getting the details onto the surgeries clinical system.</li> <li>○ Practices QOF scores will fall without accurate information from the pharmacies.</li> <li>○ What happens with follow up for complications – the role of the pharmacist or will patients be referred back to the GP?</li> </ul> </li> <li>▪ The CRG Practice Managers believe this initiative will further destabilise the already fragile General Practice.</li> <li>▪ With regard to the flu vaccines, the tipping point will not be this year but there is a very real prospect that when practices look at the results of next year's Flu DES there is a very real possibility that a significant number of practices will consider opting out of providing this service next year, with the potential of a devastating drop in uptake for NHS England to deal with</li> <li>▪ Increasing provision of a service, in a market where the demand is declining, will not resolve the problem. It seems that a national solution has been adopted to achieve a national target without much consideration given to the reasons why the target has not been reached.</li> </ul>		

7. Do you agree with the conclusions for the Stop Smoking Service?			
Yes = 100% (n=8)	No = 0% (n=0)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
No detailed comments received			

7. Do you agree with the conclusions for the Sexual Health Service?			
Yes = 87.5% (n=7)	No = 12.5% (n=1)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
<p>Kalsons Chemist 138 Hobleythick Lane, Westcliff-on-Sea, Essex, SS0 0RJ</p> <p>Earls Hall Pharmacy 8 Earls Hall Parade, Southend-on-Sea, Essex SS2 6NW</p>	<p>The sexual health service is fragmented and hence uptake is poor irrespective of the location or willingness of the pharmacy to provide the service. Expansion of what pharmacists can provide under this service would ensure comprehensive service delivery and improve uptake along with holistic care in this aspect of the patient/clients life.</p> <p>Page 60 - 63, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group noted that the “Future” box sets out a commitment to redesign and integrate services and that reasons for low activity may be related to choice by service users but will be explored as part of the redesign work</li> <li>▪ The “Looking to the future section” (page 74) proposes a range of new services for consideration by commissioners</li> </ul>	No
NHS England - Essex Area Team	<p>Only one pharmacy (located in Milton ward, East Locality) is actively providing the service. This may be explained by the fact that some women prefer to use town centre pharmacies as these offer a sense of anonymity</p> <p>What does this specifically refer to and if there are other areas where pharmacies are providing this service which is within easy travelling distance</p> <p>Page 63, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group was advised that the comment is referring to the fact that whilst 18 pharmacies have been commissioned to provide the service only one is delivering any appreciable activity</li> <li>▪ The document states a commitment to investigate why this is the case</li> <li>▪ The PNA to be re-worded as follows: <i>“Only one pharmacy (located in Milton ward, East Locality) is actively providing the service. This may be explained, in part, by the fact that some women prefer to use town centre pharmacies as these offer a sense of anonymity; however, we need to fully understand the reasons as to why the majority of pharmacies are not active”</i></li> </ul>	

7. Do you agree with the conclusions for the Needle and Syringe Programme?			
Yes = 100% (n=8)	No = 0% (n=0)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
No detailed comments received			

7. Do you agree with the conclusions for the Supervised Consumption Service?			
Yes = 100% (n=8)	No = 0% (n=0)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
NHS England - Essex Area Team	<p>3/21 pharmacies are not actively providing this service. This reduces the number of pharmacies providing the service on a Sunday in the West Locality and it means that no pharmacies are open to provide the service on Saturday evenings from 7pm. Not sure what this means could it be made clearer please and there could be potential to commission this service via 100 hour pharmacies.</p> <p>Page 71, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group was advised that the statement is attempting to reflect the fact that there is a gap in access on a Sunday because some pharmacies (which are open) don't actively provide the service</li> <li>▪ It was agreed that the conclusion would be re-worded to provide greater clarity</li> </ul>	Yes

**8. Do you agree with the assessment of future pharmaceutical services?**

Yes = 75% (n=6)

No = 25% (n=2)

Not sure = 0% (n=0)

Not answered / Feedback Form Not Used (n=7)

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
<p>North &amp; South Essex LMCs Ltd</p>	<p>Pharmacy based immunisation services</p> <p>The LMC would not support immunisations such as Childhood Imms, Pneumococcal vaccinations or Hepatitis B being provided by pharmacists in the future. These services have historically been delivered in an efficient manner in general practice. Introducing further providers could lead to destabilisation of currently excellent services provided in general practice</p> <p>A major concern is that, far from improving the service to the patients, the extension of the scheme threatens to make the service even worse. The view of PMs is that pharmacies will be able to 'cherry pick' the easy walk-in vaccinations and leave the harder to reach patients for the GP surgeries to do. In a very short space of time GP surgeries may no longer find it financially viable to take on this service, and it is doubtful that pharmacies will be interested in vaccinating patients in care homes' or the non-English speaking population.</p> <p>Page 73, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The comment relates to the potential service development " immunisations"</li> <li>▪ The PNA Steering Group noted that delivering a broader range of vaccinations, through pharmacy, would improve choice for residents and would potentially increase uptake</li> <li>▪ The comment and concerns were noted</li> </ul>	<p>No</p>

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
<p>Howells &amp; Chana Chemists 72 West Road, Shoeburyness Essex, SS3 9DS</p>	<p><b>Rota service</b> Consideration should be given to re-introducing a pharmacy rota system to enable provision of pharmaceutical services on Sundays. This arrangement was taken away by the PCTs as (in their judgement) “sufficient cover was available from another pharmacy within any given ward that was no more than 20 minutes walking distance”.</p> <p>Nevertheless, Howells &amp; Chana would be willing to extend the opening hours to align with the local surgery wishing to open earlier or shut later or extend to 7 day opening. As a minimum, Howells &amp; Chana would be willing to open the same time as a local GP surgery and closing 30 minutes later</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group considered the proposal but concluded that a rota service was not necessary at this point in the time</li> <li>▪ In the future, if it is determined that a rota service may be required then a decision will be taken as to whether or not the PNA needs to be revised and a full assessment made</li> </ul>	<p>No</p>
<p>NHS England - Essex Area Team</p>	<p><b>Aspirations for future pharmacy services and premises</b> Contract is for 40 hours we cannot enforce extra opening.</p> <p>Consultation area – We can't refuse an application from a provider who doesn't want to deliver MURs and the regulations need to be checked around the consultation area. DDA can't be enforced by the Area Team.</p> <p>Page 72, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group was advised that the Regulations now state that a pharmacy must open for a minimum of 40 hours</li> <li>▪ The aspiration section is intended to send a signal to potential market entrants that we would wish to see pharmacies providing extended hours as part of their core hours</li> <li>▪ Similarly, it is desirable for applications to recognise that meeting the needs of those with disabilities and the provision of the full range of advanced, enhanced and locally commissioned services is important</li> <li>▪ It was acknowledged that NHS England may not have the power to commission against all of the aspirations but it was important for the PNA to document these</li> </ul>	<p>No</p>

9. Is there any additional information which should be included in the PNA?			
Yes = 25% (n=2)	No = 75% (n=6)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=7)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
Howells & Chana Chemists 72 West Road, Shoeburyness Essex, SS3 9DS	Non-NHS Services should be included as 'relevant' services provided in a pharmacy. It may well be that some of these services, for example weight management, travel services and pain management, will come in under the HLP. The PNA could map these services so that any new applicant would be alerted to current services classed as non-NHS.	<ul style="list-style-type: none"> <li>Non-NHS services are excluded from the scope of the PNA because they cannot be taken into account when considering applications to provide pharmaceutical services</li> </ul>	No
Kalsons Chemist 138 Hobblythick Lane, Westcliff-on-Sea, Essex, SS0 0RJ  Earls Hall Pharmacy 8 Earls Hall Parade, Southend-on-Sea, Essex SS2 6NW	Additional private services such as PGDs mentioned above to ensure gaps are not identified by potential applicants	<ul style="list-style-type: none"> <li>Non-NHS services are excluded from the scope of the PNA because they cannot be taken into account when considering applications to provide pharmaceutical services</li> </ul>	No

10. Has the PNA provided adequate information to inform market entry decisions (NHS England only) or how you will commission services from pharmacy (all service commissioners)?			
Yes = 100% (n=8)	No = 0% (n=0)	Not sure = 0% (n=0)	Not answered / Feedback Form Not Used (n=14)
Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
No detailed comments received			

**11. Does the PNA give enough information to help with your own future service provision (pharmacies and DACs only)?**

Yes = 80% (n=4)      No = 0% (n=0)      Not sure = 20% (n=1)      Not answered / Feedback Form Not Used (n=10)

*Where the respondent was not a pharmacy or DAC, the response was amended to N/A.*

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
Howells & Chana Chemists 72 West Road, Shoeburyness Essex, SS3 9DS	In the past, it would appear that financial constraints have prevented services being rolled out. For example, Howells & Chana invested in training staff in the provision of COPD/Asthma service (an Advanced Service provision) some time ago but the service was not rolled out.  Similarly, Howells & Chana are interested in HLP accreditation. Staff are trained and currently provide advice on self-care, healthy lifestyle and carry out Public Health campaigns.	<ul style="list-style-type: none"> <li>The PNA Steering Group noted that the comment relates to business development rather than the pharmaceutical needs assessment</li> </ul>	No

**12. If you have any further comments please enter them in the box**

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
Online ID: 6032967	As regards providing the pharmaceutical services when the GPs start opening seven days a week and extended hours during the weekdays, we can form a rota service with other pharmacies in that area to provide the pharmaceutical services during extended opening hours	<ul style="list-style-type: none"> <li>The PNA Steering Group noted the comment</li> </ul>	<ul style="list-style-type: none"> <li>No</li> </ul>
NHS England - Essex Area Team	Locally commissioning services Provider criteria – why is this relevant – it changes and updates will be required to the PNA e.g. requirements to use quit manager, attend update event, CPPE courses (now self-accreditation?)	<ul style="list-style-type: none"> <li>The PNA Steering Group noted the comment</li> <li>It was agreed to amend the PNA to state that 'criteria were subject to change'</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> </ul>

Organisation	Detailed Comment	PNA Steering Group Decision	PNA Amended?
NHS England - Essex Area Team	<p>Overall conclusions section</p> <p>Stop smoking is relevant but not necessary because it can be accessed through other providers</p> <p>Page 59 and 77, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group acknowledged that Stop Smoking may be accessed through other providers</li> <li>▪ However, the conclusions for the Stop Smoking service also state: <ul style="list-style-type: none"> <li>○ There is good evidence to support community pharmacy-based stop smoking services</li> <li>○ Pharmacy services are beneficial in that medication to support a quit attempt may be supplied at the point of consultation</li> <li>○ Activity data generally points to a good performance for Southend-on-Sea pharmacies</li> <li>○ These factors, together with the alignment with our strategic priorities around cancer, cardiovascular disease and COPD, have led us to conclude that this service is <b>necessary</b> to meet the pharmaceutical needs of our population</li> </ul> </li> <li>▪ Therefore, this service meets a number of the criteria (as set out on page 20 of the PNA) for determining that a service is necessary to meet a pharmaceutical need</li> </ul>	<ul style="list-style-type: none"> <li>▪ No</li> </ul>
NHS England - Essex Area Team	<p>Summary of gaps</p> <p>Area Team can't enforce provision of MURs – voluntary additional service</p> <p>Page 78, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group confirmed that the proposed solution is intended to send a signal to existing and new contractors that we wish MURs to be provided by all Southend-on-Sea Pharmacies</li> </ul>	<ul style="list-style-type: none"> <li>▪ No</li> </ul>
NHS England - Essex Area Team	<p>Summary of gaps</p> <p>NMS – again Area Team can't enforce but can encourage</p> <p>Page 78, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ The PNA Steering Group confirmed that the proposed solution is intended to send a signal to existing and new contractors that we wish the NMS to be provided by all Southend-on-Sea Pharmacies</li> <li>▪</li> </ul>	<ul style="list-style-type: none"> <li>▪ No</li> </ul>
NHS England - Essex Area Team	<p>Summary of gaps</p> <p>Seasonal flu will continue to be commissioned – and is provided by GP practices so there is no gap</p> <p>Page 78, Draft PNA</p>	<ul style="list-style-type: none"> <li>▪ PNA steering group agreed to amend the solution to reflect the change to the seasonal influenza vaccine section i.e. <i>“we would wish to see NHS England commissioning appropriate services, through a range of providers, in order to increase uptake for all eligible patients, irrespective of age”</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ Yes</li> </ul>