

TO: West Gloucestershire Primary Care Trust

FROM: Sian Chard, Head of Primary Care Development

DATE: 21st April 2005

SUBJECT: West Gloucestershire PCT's Pharmacy Needs Assessment and Control of Entry Regulations

1.0 PURPOSE

For the PCT Board to note and agree the following items arising from the new Pharmacy Contract which is scheduled to be implemented from 1st April 2005:

- The process for pharmacists under the new Control of Entry Regulations
- West Gloucestershire PCT's Pharmacy Needs Assessment

2.0 BACKGROUND

From 1st April 2005, a new Pharmaceutical Contractual Framework will be in place for NHS pharmacy. Its structure has three core aspects: Essential Services which all pharmacists must provide, Advanced Services which requires accreditation and training and Enhanced Services which are locally commissioned by the PCT to meet the needs of the local population. The new regulatory framework particularly the Control of Entry regulations will enable competition and choice to be taken into account when PCTs assess the adequacy of pharmaceutical services within their area and when considering new applications for pharmacy provision.

3.0 CONTROL OF ENTRY

Control of Entry is the process through which a PCT determines whether an application to establish a new pharmacy is desirable or necessary. The aim of the process is to ensure adequacy of NHS pharmacy provision in a neighbourhood. The main reforms to the Regulations comprise:

Introduction of new criteria of 'competition and choice' to the current regulatory test: This will provide a more even balance in deciding whether to approve or refuse an application. In assessing whether or not there is adequate provision in a neighbourhood, PCTs should consider factors such as access, choice and diversity, service innovation, services to meet specific disease needs and the overall long term impact.

Four automatic exemptions to the regulatory test: The four automatic pharmacy applications that are exempted from the regulatory reformed control of entry are:

- Pharmacies based on approved retail developments over 15,000 square metres gross floor space away from town centres
- Pharmacies that intend to open for more than 100 hours per week
- Applications from member of a consortia wishing to establish one stop primary care centres.
- Wholly mail order or internet based pharmacy services

All such applications are still subject to such pharmacies providing a full range of services appropriate to local needs as identified by the PCT through their Pharmaceutical Needs Assessment.

Streamlining and modernisation of the application and decision making process: This includes set timeframes for receipt and consideration of applications, wide consultation with stakeholders and the option to invite applications from contractors. For those PCT Non Executive Directors / Directors involved in Dispensing Panels and consideration of new applications from pharmacies a training session will be provided on the new process and the implications of the changes.

Minor Relocations: Minor relocation applications are made when an applicant is already providing pharmaceutical services from existing premises and the applicant seeks to change premises within a neighbourhood. The new regulations allow PCTs to automatically approve these applications if the relocation is less than 500 metres.

4.0 PHARMACEUTICAL NEEDS ASSESSMENT

These combined changes provide PCTs with three distinct challenges:

- To make the most of the new flexibility and choice offered by the new framework and enable PCTs to commission enhanced services from community pharmacy.

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- To fully prepare to utilise the reformed control of entry rules. A pharmaceutical needs assessment is crucial in order to inform the range of services that PCTs can specify under the control of entry exemptions as previously outlined.
- To integrate more fully community pharmacy commissioning with primary care in general and with the new GMS contract in particular.

To do this it is critical that PCTs undertake and regularly review the pharmaceutical needs of their population so that they:

- Understand the pharmaceutical needs of their population
- Take stock of the current community pharmacy services provided
- Consider the potential of community pharmacy in redesigning services
- Take a rational approach to commissioning services from community pharmacy

PCTs have been mandated to undertake a robust needs assessment as part of the implementation of the new pharmaceutical contractual framework. For West Gloucestershire PCT, this has meant drawing on numerous national and local strategies in addition to analysing prescribing, GP QoF data, PCT performance data and qualitative and quantitative data collected through pharmacy visits and various postal questionnaires sent to local pharmacies in order to gain a clear understanding of unmet need, areas for development and local control of entry criteria. Key findings include:

- Scope to develop extended opening hours and incentivising out of hours pharmacy provision particularly in more rural parts of West Gloucestershire.
- The identification of potential enhanced type pharmaceutical services to meet identified diseases within the geographical patches of West Gloucestershire.
- Identification of specific conditions for exempt applications under control of entry. Specifically this related to the provision of Emergency Hormonal Contraception and Nicotine Replacement Therapy.

Due to a short timescale for implementation, all PCTs including West Gloucestershire has been forced to undertake a restricted consultation on the needs assessment with the expectation of a more detailed review and consultation taking place next year. Gloucestershire Local Pharmaceutical Committee has formally reviewed the assessment and their comments have been incorporated. The full report is available on request.

5.0 RECOMMENDATIONS

It is recommended that the Board note and agrees the content of this report.