

**Submission to Healthwatch England to inform Review of NHS Pharmacy Regulations on 22 August 2017**

Thanks for your post on Review of NHS Pharmacy Regulations.

You may be aware that in 2015 HWW escalated an issue re GP Dispensing and the Pharmaceutical regulations to HWE. In it we raised a number of points about the Regulations, these are summarised in section 4 of our document. HWE used this work as a case study in its submission to the Ministerial Review of Community Pharmacy. I am attaching the HWW escalation, and the eventual submission from HWE for ease of reference. We are not aware that there was any specific outcome from the escalation, so this may be the opportunity to raise the points made again.

We were participant observers in the previous PNA process in Worcestershire and are involved in the same capacity in the refresh. I am attaching our submission in response to the published PNA (2015). Our observation is it that the PNA lacks "teeth" and is too focused on the present and Health and Wellbeing Board priorities and not forward looking enough about the potential for pharmacy commissioning to extend the role of pharmacy to contribute in a meaningful way to the wider agenda e.g. Five Year Forward View, in particular as a means of alleviating pressure on GPs / primary care and Urgent Care.

The published PNA in 2015 found that there were not any areas in Worcestershire where there was need for pharmacy services, however there were issues arising from the public consultation re information about opening hours (particularly out of hours) and other access issues. This was identified in the conclusions - one of which was that providers were asked to "consider and reflect" on the comments received. Other conclusions related to encouraging the uptake of healthy living pharmacies and further exploration of the potential for the development of pharmaceutical services to deliver HWB priorities. When we asked at the Health & Wellbeing Board for providers to be asked to develop an action plan to address the points raised under the "Strategy to Reduce Access Highlighted in Public and Service User Engagement" the minutes record that "Unfortunately NHS England was not able to ask for an action plan, but the local Pharmaceutical Committee had agreed that it would work towards implementing the Joint Health and Wellbeing Strategy.

We do think that there should be provision for clear, implementable recommendations to be made as a result of the PNA, otherwise it seems to us that there is a danger it becomes a "tick box" exercise. We also think that the regulations should enable the PNA to have a more forward looking focus.

On a positive note the PNA refresh process will include more forward looking questions in the public consultation and we are hopeful of stronger recommendations as an outcome.

If you need any further information please do let us know.