

National Assembly for Wales / Cynulliad Cenedlaethol Cymru  
[Health and Social Care Committee / Y Pwyllgor Iechyd a Gofal Cymdeithasol](#)  
[Public Health \(Wales\) Bill / Bil Iechyd y Cyhoedd \(Cymru\)](#)  
Evidence from the Company Chemists' Association – PHB 38 / Tystiolaeth  
gan Y Gymdeithas Cwmnïau Fferyllol – PHB 38



### **Consultation on the Public Health (Wales) Bill**

The Company Chemists' Association (CCA) provides a forum for the large businesses engaged in community pharmacy to work together to help create an environment where pharmacy can flourish and providers compete in a fair and equitable way. The CCA aims to represent our members, empower our members to understand the changing policy environment, and influence that policy environment.

Our nine member companies – Boots, The Co-operative Pharmacy, Lloydspharmacy, Tesco, Sainsbury's, Wm Morrison Supermarkets, Asda, Rowlands Pharmacy and Superdrug – own over 6,400 pharmacies between them which represents almost 50% of the pharmacies in the United Kingdom. Our members own 381 pharmacies in Wales representing over 53% of the total pharmacies in Wales.

We are pleased to be able to respond to the Welsh Governments call for evidence on the Public Health (Wales) Bill

### **Part 5: Pharmaceutical Services**

Part 5 of the Bill includes provision to require each local health board to publish an assessment of the need for pharmaceutical services in its area with the aim of ensuring that decisions about the location and extent of pharmaceutical services are based the pharmaceutical needs of local communities.

- Do you believe the proposals in the Bill will achieve the aim of improving the planning and delivery of pharmaceutical services in Wales?

Yes. Pharmaceutical needs assessments have proven to be a highly effective method for Health commissioning bodies to identify the needs of its population and what services can be commissioned from community pharmacies to address those needs. However only by periodically reviewing those needs, commissioners can stay up to date with the continued requirements and identify new issues that arise within its population. We also stress that PNAs must be part of a wider assessment of need. PNAs should not be written in isolation but should encourage inter-professional and inter-sector collaboration. By reducing the geographical scope of PNAs would be to the detriment of patient needs. It is important to remember that patients do not always adhere to geographical boundaries when accessing healthcare, therefore neighbouring LHBs PNAs as well as

bordering English CCGs PNAs should be considered. An example of a well worked assessment that meets many of the relevant criteria is from Salford<sup>i</sup>

- What are your views on whether the proposals will encourage existing pharmacies to adapt and expand their services in response to local needs?

PNAs should provide a clear guide to contractors on what services are required and are expected to be delivered locally. There must be a clear service delivery target, agreed between the Health Board, Community Pharmacy Wales and the contractors. Furthermore, Health Boards must have properly advertised the service to the public. Preparation of promotional material should be done in collaboration with Community pharmacy Wales. If these factors are considered and incorporated accordingly then PNAs should act as both the 'carrot' and 'stick' in driving delivery of services that would benefit local patient populations. We would add that some services, such as emergency contraception, introduce a 'conscientious objection' element into service delivery. It would seem inappropriate to penalise a contractor (by encouraging new pharmacies to open) where the pharmacist is exercising their right of conscientious objection.

We recommend that failure to consistently offer services specified in the PNA which were a condition of granting a pharmacy contract lead to a rapid removal from the Pharmaceutical List for that site since the conditions of grant and the health needs of the population would not be being met.

- Do you believe the proposals relating to pharmaceutical services in the Bill will contribute to improving public health in Wales?

The proposals in the Bill if adopted with enthusiasm by both commissioners and service providers should see the availability of services that improve public Health in Wales expand and become more accessible to patients across the nation and at times that suit them. Community Pharmacy plays a significant role in looking after the health needs of the nation. Our position at the heart of every community gives us an unique vantage point as an accessible and welcoming health care provider. This should be capitalised on by LHBs and Pharmacy should be at the forefront of their thinking when dealing with pressing public health needs.

For any queries please contact:

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<sup>i</sup> <https://www.salford.gov.uk/pharmaceuticalneedsassessment.htm>