

Consultation Response – NHS England & Improvement – Integrating Care

Next steps to building strong and effective integrated care systems across England

January 2021

For enquiries regarding this response, please contact:

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About Community Pharmacy Surrey & Sussex

Community Pharmacy Surrey & Sussex is the local voice for all community pharmacies on behalf of East Sussex, West Sussex and Surrey Local Pharmaceutical Committees (LPCs).

We represent over 520 pharmacies, on all matters relating to the NHS and public health work undertaken by community pharmacy. This includes single handed independent pharmacies through to medium and large pharmacy businesses. Pharmacies in our area, between them, employ thousands of local people and are at the heart of communities.

Community Pharmacy Surrey and Sussex negotiates and discusses local pharmacy services with commissioners and is available to give advice to community pharmacy contractors and others wanting to know more about local pharmacy. We are committed to helping to develop and support community pharmacy teams, to deliver high quality health services.

Working closely with the local NHS, including NHS England & Improvement regional team, CCGs and local government, we are responsible for advancing the enhanced role of community pharmacy to ensure it plays an active part in promoting health and wellbeing across Surrey and Sussex. Our vision is to enhance the role of community pharmacy and to ensure the sector has an active role in promoting health and wellbeing in Surrey and Sussex.

Local Pharmaceutical Committee (LPC) are local representative committee of pharmacy contractors in the area covered by the LPC that has been approved by NHS England under the NHS Act 2006, as the body representing the owners of the community pharmacies in the Surrey Health and Wellbeing Board area.

Regulations under the NHS Act require NHS England to consult LPCs on matters such as market entry and local enhanced services. The LPC negotiates and discusses locally commissioned pharmacy services with other commissioners and is available to give advice to community pharmacy contractors and others wanting to know more about local community pharmacy.

The LPC constitution sets out the role and duties of the LPC that include:

- representing their contractors in local and national consultations relevant to pharmacy contractors; making representations to NHS England, Health and Wellbeing Boards and PSNC.
- providing support, resources and guidance to pharmacy contractors, such as advice on contract compliance and monitoring, market entry and other locally commissioned services.
- promotion and development of local pharmacy through local public affairs and lobbying to create an environment for community pharmacy to flourish.

Further information is available on our website at <http://communitypharmacys.co.uk/>

Response

We welcome the opportunity to be able to provide our response to the proposals set out in NHS England's consultation document *Integrating care - Next steps to building strong and effective integrated care systems across England*.

The consultation was open for around 6 weeks (which included Christmas and New Year holiday period) at a time when the entire NHS including community pharmacy has been focussed on a critical phase in the pandemic response. During that time, LPC committee members in East Sussex, West Sussex and Surrey LPCs were unable to meet to meaningfully consider, what could be significant and far-reaching proposals. It is questionable if other audiences of the consultation document will have had time to comprehensively review and respond.

We would encourage the consultation to be extended or restarted, following established Cabinet Office Guidance and Gunning Principles on public body consultation. There were several parts of the consultation which lacked sufficient detail to be able to respond, including:

- The role of ICS as potential commissioners of primary care services, especially in relation those beyond GP services, such as community pharmacy current and future services; and
- Potential transfer of the commissioning of community pharmacy and other primary care services to from NHS England & Improvement to ICS

We ask NHS England & Improvement to provide greater clarity on these important issues, and the opportunity for local and national representatives of community pharmacy contractors to be involved in further consultation and discussion.

We note PSNC is providing a fuller response on behalf of all NHS community pharmacies in England.