

Community Pharmacy Lancashire response to the NHS England / NHSCC consultation on items which should not routinely be prescribed in primary care

In July 2017 year NHS Commissioners and NHS England published proposals on 18 medicines which they suggested should no longer be routinely prescribed in primary care, because they are either clinically ineffective or the NHS can offer clinically proven alternative.

Lancashire Local Pharmaceutical Committee are known as Community Pharmacy Lancashire. A Local Pharmaceutical Committee, or LPC, is a statutory body that works within NHS regulations to represent and support community pharmacists and owners of community pharmacies. Community pharmacies (also known as chemists) can be found across Lancashire e.g. in health centres, supermarkets and high streets, villages and local housing estates and also online.

Community Pharmacy Lancashire works with the local NHS England area team, 8 CCGs, local authorities and other healthcare professionals to help plan health care across the 3 Health & Well Being Boards of Blackpool, Blackburn with Darwen and Lancashire County Council. We work with commissioners to implement community pharmacy services. We are available to advise community pharmacists and owners, as well as allied professions such as GPs and hospitals. This advice is also available to those who want to know more about what their local pharmacy can offer them, or those people who are simply visiting the area.

Part 1 of the consultation focuses on medicines which should no longer be routinely prescribed because they are either clinically ineffective, unsafe or not cost effective; or the NHS can offer a clinically-proven alternative for patients. Community Pharmacy Lancashire (CPL) supports these proposals, as these items are either dangerous or not the most effective treatment available. CPL believes that the national NHS prescribing blacklist should be used to restrict these products, this would prevent some areas developing local policies that could potentially make these items available to patients within that particular area.

It is also important that communications of these changes to all healthcare professionals and patients are approved at a national level to prevent local amendments, and that time is given to allow practices to speak with patients concerned to explain these changes personally thus using a patient centred approach rather than sending a letter; an approach which often does little to alleviate the anxiety caused by a change to medication as it does not involve the patient in the decision making.

It is essential that pharmacy contractors are given adequate notice of changes to prescribing, when these are being implemented at a local level, so that stock levels of the affected products can be properly managed, and they too have the opportunity to support their patients in having conversations with them to support the message given from their general practice.

Part 2 of the consultation looks at medicines which are available to purchase over the counter (OTC). Community Pharmacy Lancashire does however have concerns regarding the items listed in chapter 5. Our footprint contains some of the most deprived areas of the UK, and barriers should not be put in the way for those who cannot afford to purchase these medicines. This proposal alters the principle that care is free at the point of delivery and will be damaging to people living within those areas. This is against principle 2 of the NHS Constitution, which clearly states that 'Access to NHS services is based on clinical



need, not an individual's ability to pay'. We believe that this is a fundamental change of principle within our NHS and that decision should be made by Parliament and not implemented at will by Clinical Commissioning Groups.

Community Pharmacy Lancashire believes that these proposals have not been thoroughly assessed including the risk of unintended consequences, such as increased use of A&E; increased prescribing of more potent prescription only items as a replacement for previous prescribing of OTC medicines, and the scope of some of the licensing of certain OTC products in relation to medical conditions.

We fully support self-care and believe that it should be encouraged. A nationwide NHS Minor Ailment service would be a way to promote access for these medicines without putting unnecessary stress on GPs and other prescribers. We believe this service would also reduce the pressure on urgent care particularly if supported by appropriate signposting to community pharmacy by NHS 111.