

Community pharmacy to promote health and wellbeing

Consultation on draft guideline – deadline for comments 5pm on 21/02/2018 **email:** CommunityPharmacy@nice.org.uk

	<p>Please read the checklist for submitting comments at the end of this form. We cannot accept forms that are not filled in correctly.</p> <p>We would like to hear your views on the draft recommendations presented in the short version and any comments you may have on the evidence presented in the full version. We would also welcome views on the Equality Impact Assessment.</p> <p>We would like to hear your views on these questions:</p> <ol style="list-style-type: none">1. Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why.2. Would implementation of any of the draft recommendations have significant cost implications?3. What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.) <p>See section 3.9 of Developing NICE guidance: how to get involved for suggestions of general points to think about when commenting.</p>
Organisation name – Stakeholder or respondent (if you are responding as an individual rather than a registered stakeholder please leave blank):	<p>[PAGB]</p> <p>PAGB is the UK trade association representing the manufacturers of branded over-the-counter medicines, self care medical devices and food supplements.</p>
Disclosure Please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry.	<p>[None]</p>
Name of commentator person completing form:	<p>[Donna Castle, Director of Public Affairs and Communications]</p>

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Type		[office use only]		Comments
Comment number	Document (full version, short version or the appendices)	Page number Or 'general' for comments on the whole document	Line number Or 'general' for comments on the whole document	
				<p>Insert each comment in a new row.</p> <p>Do not paste other tables into this table, because your comments could get lost – type directly into this table.</p>
1	Full	General	General	<p>PAGB supports the overarching aims of this draft NICE guideline.</p> <p>Pharmacists are highly skilled healthcare professionals able to provide advice and support to their local population. Pharmacists are experts in medicines and are ideally placed to empower people to self care.</p> <p>Supporting people to self care for self-treatable conditions is important for the future sustainability of the NHS, ensuring people are seen by the right healthcare professional at the right time, reducing demand on already overstretched GP and A&E services.</p>
2	Full	General	General	<p>Community pharmacists have an important role in supporting people to self care and advising them on appropriate over-the-counter medicines and other self care products to treat or manage their symptoms. The NICE guideline should include more on this, particularly given the NHS England and NHS Clinical Commissioners consultation “<i>Conditions for which over the counter items should not routinely be prescribed in primary care</i>”¹. This consultation lists 33 conditions for which prescriptions should not routinely be offered for first line treatments. If/when implemented, this will mean that people who previously visited the GP will be visiting the pharmacy for advice and to buy a medicine.</p> <p>It is important to ensure pharmacists have the tools they need to support people to self care, but also that people have confidence in the advice they are given.</p> <p>To help overcome the challenge of providing continuity of care and giving people confidence in pharmacy advice, community pharmacy should be enabled to ‘write’ in patient records so that any medication and advice given can be recorded. Most pharmacies can now access health records but they can’t record the advice/medication they give so people may still prefer to visit the GP for continuity of care. Enabling pharmacists to write to health records would mean that advice and treatment given in other health settings (GP, hospital) can take general health, underlying conditions</p>

¹ NHS England and NHS Clinical Commissioners, Conditions for which over the counter items should not routinely be prescribed in primary care: a consultation on guidance for CCGs
<https://www.engage.england.nhs.uk/consultation/over-the-counter-items-not-routinely-prescribed/>

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				and medicines use into account.
3	Full	5	7-16	<p>PAGB agrees that it is vital to promote community pharmacies as an integrated part of the care pathway and the first port of call for advice on minor health concerns.</p> <p>PAGB is concerned that there is currently a lack of awareness of the information and services that pharmacists can provide. PAGB research in 2016 found that 47% of people would not go to the pharmacist for advice, with one in five of those saying that they didn't think pharmacists were as qualified as doctors².</p> <p>PAGB supports the new NHS England/Public Health England "Stay Well Pharmacy" campaign, which we believe has the potential to help overcome the challenge of the lack of awareness in pharmacy expertise. We have been calling for a national campaign to promote the expertise of pharmacists and we are pleased to be partners in the campaign. We believe it is important that campaign activity is sustained long-term to ensure the message reaches all parts of the population.</p> <p>Furthermore, more needs to be done to improve the NHS 111 algorithms to reduce the number of people referred to a GP or A&E unnecessarily, when appropriate care and support could be provided in a pharmacy, many of which have extended evening and weekend opening hours.</p>
4	Full	5	20	<p>PAGB believes that community pharmacists need to be given the tools to effectively support self care and be seen as the first port of call for advice on minor health concerns. We support the recommendation in the draft guideline that pharmacists should be able to refer directly to other services, as appropriate, fast-tracked if the pharmacist identifies a red flag symptom and deems it necessary. This would help overcome the challenge of encouraging people to visit the pharmacy first, as because they would know they would leave with either a medicine or advice to make them feel better, or a referral/appointment with another healthcare professional.</p>
5	Full	5 - 6	18 - 9	<p>PAGB supports the need for pharmacy staff to be proactive in making interventions to promote health and wellbeing, particularly in recommending appropriate over-the-counter medicines, self care medical devices and food supplements to support people's wellbeing. This could include, for example, recommending an over-the-counter PPI product for someone who regularly buys antacids or recommending folic acid and other appropriate supplements to women planning a pregnancy (e.g. buying a pregnancy testing kit). We also support the promotion of smoking cessation services to support people in their quit attempts.</p>

Insert extra rows as needed

² PAGB, Self Care Nation report. Survey of 5,011 UK adults. Published November 2016 <https://www.pagb.co.uk/latest-news/report-self-care-nation-self-care-attitudes-behaviours-uk/>

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Checklist for submitting comments

- Use this comment form and submit it as a Word document (not a PDF).
- Complete the disclosure about links with, or funding from, the tobacco industry.
- Include page and line number (not section number) of the text each comment is about.
- Combine all comments from your organisation into 1 response. We cannot accept more than 1 response from each organisation.
- Do not paste other tables into this table – type directly into the table.
- Underline and highlight any confidential information or other material that you do not wish to be made public.
- Do not include medical information about yourself or another person from which you or the person could be identified.
- Spell out any abbreviations you use
- For copyright reasons, comment forms do not include attachments such as research articles, letters or leaflets (for copyright reasons).
We return comments forms that have attachments without reading them. The stakeholder may resubmit the form without attachments, but it must be received by the deadline.

You can see any guidance that we have produced on topics related to this guideline by checking [NICE Pathways](#).

Note: We reserve the right to summarise and edit comments received during consultations, or not to publish them at all, if we consider the comments are too long, or publication would be unlawful or otherwise inappropriate.

Comments received during our consultations are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the comments we received, and are not endorsed by NICE, its officers or advisory Committees.