

## Defining the Role of the PCN Community Pharmacy Lead (PCN CP Lead)

The purpose of this document is:

- To ensure all PCN CP Leads understand what their role is and what it is not.
- To provide PCN CP Leads with information to enable discussions with PCN leadership regarding their role and cost implications of utilising PCN CP Leads.
- To ensure PCN CP Leads understand the impact of Competition Law on their work.

### Important Note on Representation

The PCN CP Lead role provides a single point of contact for the PCN to pharmacy contractors within the PCN. However, pharmacy PCN CP Leads must be careful not to be mistaken as the representative for community pharmacy. Local Pharmaceutical Committees (LPCs) are the representative body for community pharmacy contractors within an area. Community Pharmacy West Yorkshire (CPWY) is the Local Pharmaceutical Committee and as such is the representative of all community pharmacy contractors within West Yorkshire. Although CPWY is supporting the role of PCN CP Lead, Leads themselves are not a formal part of CPWY and do not have the authority to represent community pharmacy.

### Role of PCN CP Lead

PSNC defines the role of the PCN CP Lead as follows:

*The pharmacy PCN CP Lead has an important role in shaping engagement between pharmacies in the PCN and will:*

- *Provide a single channel of engagement with the PCN, building collaborative working relationships with relevant PCN members.*
- *Identify opportunities for pharmacies in the PCN area and assist the LPC, and other relevant LPCs, with the development of community pharmacy service proposals to meet local population health needs.*

The CPWY Introduction and Support Pack, sent to you when you first took on the role of PCN CP Lead defines the role as follows:

*Role and Responsibilities: The role of the PCN CP Lead is to provide a voice for community pharmacy within the designated PCN area by attending PCN meetings, gathering information on behalf of the pharmacies and sharing that information. As the PCNs develop and mature, we anticipate that the role of the PCN CP Lead will also develop to become a champion of community pharmacy within the PCN, helping to ensure community pharmacy plays a significant role in delivering healthcare services within the community. As PCN CP Lead your immediate responsibilities are:*

- **Attendance at PCN meetings**  
*Meetings usually take place monthly or every other month during normal working hours.*
- **Provide a report following meetings**  
*Following each meeting attended, you are required to provide a report to Community Pharmacy West Yorkshire using PharmOutcomes.*
- **Update pharmacies within the PCN area**  
*Following meetings and on other occasions as required, you will provide pharmacies within the PCN with information and updates using the Gaggle Group email. The Gaggle Group is a group email including the pharmacies in the PCN and selected personnel at Community Pharmacy West Yorkshire.*

Beyond the basic principles above, we have seen the role of the PCN CP Lead evolve to include:

- PQS support and engagement.
- Flu vaccination support and engagement.
- Communication channel using Gaggles and other means (e.g. WhatsApp and Telegram).
- Advocate/advisor of community pharmacy within PCN and Community Partnership meetings.
- PCN CP Leads asked to support working groups for specific PCN projects.

PCN CP Leads should be mindful of the restrictions of their role and avoid 'mission creep'.

### **Important Role Restrictions**

- The PCN CP Lead does not represent community pharmacy contractors (but has a role in engagement within the PCN).
- The PCN CP Lead cannot make decisions on behalf of contractors. Any request or proposals made to community pharmacy contractors must be discussed with and approved by contractors.
- The PCN CP Lead is currently funded by contractors (via CPWY) to attend PCN (or Community Partnership) meetings. Any other activity, requiring back fill cover should be funded by the PCN. This would include attending additional meetings and/or carrying out work on behalf of the PCN.
- PCN CP Leads are not authorised to agree new work, service structures or fees on behalf of pharmacy contractors. If a PCN CP Lead is presented with the suggestion of a new service or pharmacy undertaking a new task (i.e. not within the current pharmacy contractual framework) as part of discussions with their PCN, the PCN CP Lead needs to ensure they share this information with CPWY in the first instance, who will review the opportunity for viability and suitability. Viable service opportunities will then be discussed by CPWY with pharmacy contractors in the PCN to gauge potential provision by local contractors. This could then allow CPWY to support the PCN CP Lead with any further conversations with the PCN about the opportunity.
- Competition Law – contractors must not agree to any practices/proposals which might be deemed anticompetitive, e.g. all charging for MCA.

### **The Role of the PCN CP Lead - COMPETITION LAW**

The role of the PCN CP Lead is to be a conduit through which to encourage community pharmacies in the PCN to collaborate and work together and to engage effectively with PCNs, e.g. assisting contractors to meet the PCN-focused requirements of the Pharmacy Quality Scheme (PQS).

The PCN CP Lead has an important role in shaping the relationships between pharmacies in the PCN and will:

- Provide a single channel of engagement with the PCN leadership and building collaborative working relationships with relevant PCN members.
- Identify opportunities for pharmacies in the PCN area and highlighting to CPWY to develop community pharmacy service proposals to meet local population health needs.

As the nominated PCN CP Lead you need to be mindful of Competition Law. Competition Law concerns could arise should any commercially sensitive information be disclosed, discussed or agreed at any meeting, either a PCN meeting or a discussion with other pharmacy contractors within the PCN.

To avoid any Competition Law concerns, PCN CP Leads should take care in any discussions with other participants who are or who may become competitors to ensure that there is no collusion with regard to the provision or pricing of pharmacy or other services. For example, it is not appropriate and would be viewed as anti-competitive to agree between pharmacies within the PCN to charge the same for a service, such as delivery of medicines, or to agree to stop providing non-Equality Act MCAs.

## **Support for PCN CP Leads to Develop their Role and Influence within the PCN Structure**

Whilst the above information highlights a number funding, principle and legal restrictions on the role of the PCN CP Lead, CPWY and NHSE&I are committed to developing the role and influence of community pharmacists working within the PCN.

With this objective in mind, NHSE&I has provided additional funding (on top of the PCN meeting attendance allowance) to be used to support PCN CP Leads to achieve this objective. Please see separate guidance on the PCN Maturity Matrix here: <https://www.cpw.org/pharmacy-contracts-services/primary-care-network/primary-care-network-lead-pcn-lead-resource-centre/>

### **Funding for the PCN CP Lead Role**

If the PCN asks for work to be undertaken by the PCN CP Lead, you should question and should inquire how the time of the PCN CP Lead – a primary care clinician – will be funded. You would need to be clear that CPWY provide funding for you to attend PCN (or Community Partnership) meetings and that you are not funded to undertake additional work as directed by the PCN - either nationally within the pharmacy contractual framework or locally. If the PCN wishes to engage with the PCN CP Lead to undertake tasks on its behalf, the PCN will need to provide 'backfill' funding to allow the pharmacist cover in the community pharmacy, in order so that NHS services can continue to be provided.

### **NHS Terms of Service and Responsible Pharmacist Absence**

We would just like to remind all PCN CP Leads about the Responsible Pharmacist Regulations and how these fit with the NHS Terms of Service. As part of pharmacy's NHS Terms of Service, a pharmacist must be present on the premises at all times that NHS pharmaceutical services are being provided. This is the case during both the core and supplementary hours. Although the Responsible Pharmacist Regulations allow for the responsible pharmacist to be absent from the pharmacy premises for up to two hours, in order to meet the NHS Terms of Service there must be a pharmacist on the premises to provide pharmaceutical services during all opening hours. Full details here: <https://www.cpw.org/wp-content/uploads/sites/128/2022/07/18-01-Responsible-Pharmacist-and-NHS-hours.pdf>.