

Community Pharmacy England's response to RICS's consultation on the Draft Professional Standard: Valuation of medical centre and surgery premises 3rd edition

October 4, 2024

About Community Pharmacy England

We are the voice of community pharmacy in England, representing all of the c.10,800 community pharmacies across the country.

We champion community pharmacies across the country – representing our members and giving them the support they need, negotiating the best deal with the Government and NHS, and influencing positive change.

We represent community pharmacy businesses of all sizes in England and are responsible for negotiating the NHS Community Pharmacy Contractual Framework (CPCF) under which all community pharmacies operate.

We work closely with everyone in the community pharmacy sector, including the [Local Pharmaceutical Committees \(LPCs\)](#), to meet our goals and to promote the value of community pharmacy.

Because everyone in society needs community pharmacy to thrive.

Additional factors for inclusion in part 12.1 co-located pharmacies in England

We have no objections to what is included in part 12.1.

We consider that relevant information is missing from part 12.1.

We consider that what is missing is primarily a recognition of the changing landscape within which community pharmacies provide pharmaceutical services on behalf of the NHS, which reduces the significance of co-location with GP practices. The changing landscape includes:

Electronic Prescription Service (EPS)

Increasingly prescriptions are electronic and the benefits of co-location of the pharmacy with the GP practice are reduced – because the co-located pharmacy may no longer be the closest pharmacy to the patient once they have their prescription.

EPS prescriptions may be transmitted to any nominated pharmacy directly from the GP practice or, at the patient's request, can be downloaded from the 'NHS spine' by any pharmacy.

The vast majority of prescription items are for chronic conditions and the GP practice can send these directly to the pharmacy of the patient's choice.

EPS usage over time:

2010: **Under 1%**

March 2014: **27%** average live site usage

March 2015: **39%** average live site usage

March 2016: **46%** estimated average live site usage in February 2016

March 2017: **56%** estimated total prescriptions in England claimed by EPS Release 2

June 2021 – Coverage about EPS passing **95%** [we also published news about this milestone <https://cpe.org.uk/our-news/eps-scripts-now-over-95-of-total-items/>]

Hard-copy, paper prescriptions for chronic conditions are less likely to be picked up from the GP practice and taken to the nearest pharmacy. With the approx. 2019 EPS update, the right for

patients to receive a paper prescription ended. (Patients may still receive them, for example, for acute conditions.)

There may still be a desire to have prescriptions (hard copy or EPS) for acute conditions dispensed by the closest pharmacy to the GP practice, where there is a face-to-face consultation.

Covid 19 pandemic

There have been significant changes in the provision of GP services and patient usage of pharmacies during and post the Covid-19 pandemic.

For example, there has been an increased use of remote consultations. This reduces footfall to the surgery and the likelihood that the most convenient pharmacy for the patient is the co-located pharmacy.

The Royal College of General Practitioners 'General Practice in the post Covid world' stated in 2020 that:

New ways of working enabled by digital technology: Before the crisis, a minority of practices used doctor-led remote triage as the access point for services; within weeks nearly all were doing so.² Over 70% of GP consultations in England were carried out face-to-face prior to the Covid outbreak; within weeks the figure was 23%.³ Digital technology has also enabled new ways of working across organisational boundaries in the health and care sector and has the potential to contribute to remote diagnosis and monitoring of disease.

<https://www.rcgp.org.uk/getmedia/4a241eec-500b-44f7-96fe-0e63208f619b/general-practice-post-covid-rcgp.pdf>

The BMA states on its website that:

Approximately two-thirds (66%) of appointments were delivered face-to-face, including home visits.

[Pressures in general practice data analysis \(bma.org.uk\)](https://www.bma.org.uk/pressures-in-general-practice-data-analysis)

We also consider that the general state of the sector should be a consideration, which currently is very difficult for pharmacy owners.

Pharmacy Funding

Community pharmacy is subject to severe Government underfunding which needs to be addressed urgently.

We have released a national report confirming the severe financial pressures **putting community pharmacies at risk of closure**, threatening patient care and access to services across England.

The [Pharmacy Pressures Survey 2024: Funding and Profitability Report](#) sets out what pharmacy owners and their teams have told us about the depths of the challenges they face. The report, which is being shared with national media, MPs and other pharmacy advocates this week, is based on views shared by the owners of over 6,100 pharmacy premises in England and 2,000 pharmacy team members in our recent Pressures Survey.

Spiralling costs and workload coupled with a 30% funding cut in real terms since 2015 mean too many pharmacies are struggling to stay afloat. Countless pharmacies are at risk of closure, with our report revealing that nearly 1 in 6 may close within the next year.

The findings show that pharmacies across the sector are grappling with severe financial challenges that threaten their ability to provide even the core services for their patients. The majority (94%) of pharmacy owners report that they have seen significant increases in costs, with almost two-thirds (64%) saying they are operating at a loss.

Concerningly, these pressures are now having an impact on patients, with 18% of pharmacy staff saying they are being severely impacted. Most pharmacies now have longer prescription dispensing times (86%), delays in responding to patient inquiries (80%), and less time to spend with patients (79%).

More than 40% of the pharmacy owners surveyed earlier this year noted that the financial strain is limiting their ability to provide Advanced services, which was borne out in our [June snap poll](#) when nearly a third of pharmacies reported they had stopped provision of some of these services.

Community Pharmacy England is calling for immediate action to address the financial challenges facing pharmacies secure their future and protect the health of local communities across England.

[Read the Funding and Profitability Report](#)

Reduced opening hours

The severe financial pressures are also leading pharmacies to reduce their opening hours. We report this here: <https://cpe.org.uk/wp-content/uploads/2024/03/Briefing-on-reduced-opening-and-closures-of-community-pharmacies-January-2024.pdf>

There is particular pressure on 100-hour pharmacies even with reduced core hours (72) that were permitted by the Government in 2023.

Gordon Hockey

Director, Legal

Community Pharmacy England