

**Scottish Borders Health & Social Care  
Integration Joint Board**



Meeting Date: 28 July 2021

<b>Report By:</b>	<i>Christopher Myers, General Manager, Primary and Community Services</i>
<b>Contact:</b>	<i>Cathy Wilson, Primary Clinical Services Manager</i>
<b>Telephone:</b>	<i>01896 826 455</i>
<b>COLDINGHAM BRANCH SURGERY</b>	
<b>Purpose of Report:</b>	<p>The purpose of this report is to appraise the Integration Joint Board on the situation relating to Eyemouth Medical Practice's Coldingham Branch Surgery which the Practice has indicated is no longer sufficiently resilient or sustainable to remain viable.</p> <p>The paper asks the Integration Joint Board to note the process being undertaken to review these sustainability concerns by NHS Borders, along with the next steps.</p>
<b>Recommendations:</b>	<p>The Health &amp; Social Care Integration Joint Board is asked to <b>note</b>:</p> <ol style="list-style-type: none"> <li>a) The current situation relating to the sustainability concerns of the Coldingham Branch Surgery.</li> <li>b) That a Short Life Working Group has been established with the aim of ensuring the safe and sustainable delivery of medical and pharmaceutical service that meets the needs of Scottish Borders Population in the area. In order to do this, we will ensure that the medical and pharmaceutical needs of the population are met using a combination of reviewing the:             <ol style="list-style-type: none"> <li>a. current sustainability risks;</li> <li>b. current staffing levels;</li> <li>c. accessibility of alternative provision of Dispensing Services including the access to the closest dispensing branch; and</li> <li>d. alternative delivery models.</li> </ol> </li> <li>c) That a public consultation is currently being undertaken and is due to close on 9th August 2021. All patients registered with Eyemouth Medical Practice have been sent a letter informing them of the situation and to invite responses to the consultation.</li> <li>d) That an update paper will be drafted for a future Board meeting that will make recommendations on the future provision of services in Coldingham Branch Surgery.</li> </ol>

<b>Personnel:</b>	No NHS workforce implications, albeit the situation impacts on practice staff
<b>Carers:</b>	Possible impacts on carers will be considered when the Healthcare Inequalities Impact Assessment will be undertaken
<b>Equalities:</b>	A Healthcare Inequalities Impact Assessment will be undertaken.
<b>Financial:</b>	<ul style="list-style-type: none"> <li>• Potential minor impacts on finance to cover costs of public engagement</li> <li>• Use of internal staffing resource to manage within existing budgets</li> </ul>
<b>Legal:</b>	<ul style="list-style-type: none"> <li>• The Primary Medical Services (Scotland) Act 2004</li> <li>• The National Health Service (Pharmaceutical Services) (Scotland) Regulations 1995</li> <li>• The National Health Service (General Medical Services Contracts) (Scotland) Regulations 2018</li> <li>• CEL 4 (2010)</li> <li>• Section 2B of the National Health Service (Scotland) Act 1978</li> <li>• NHS Borders Pharmaceutical Care Services Plan 2020/21</li> <li>• Scottish Government “Shaping the Future Together” Report of the Remote and Rural General Practice Working Group</li> </ul>
<b>Risk Implications:</b>	<ul style="list-style-type: none"> <li>• Risk of public / political concern, should the Branch Surgery not be deemed as sustainable. <ul style="list-style-type: none"> <li>○ This risk is moderate due to impacts on those that use Coldingham Branch Surgery, however, there are alternative accessible options locally and it is hoped that work on public communications and engagement will reduce the risk</li> </ul> </li> <li>• Risk of Covid-19 affecting NHS Borders ability to respond <ul style="list-style-type: none"> <li>○ This risk will be tolerated and managed by prioritisation of other work</li> </ul> </li> </ul>

## Primary and Community Services



## Integration Joint Board

### COLDINGHAM BRANCH SURGERY

#### 1. Situation

- 1.1. On 8<sup>th</sup> June 2021, Eyemouth Medical Practice wrote to the General Manager for Primary and Community Services to note that the GP Partners no longer feel that they can offer a safe, sustainable Dispensing or Branch Surgery service that meets the needs of their patients using the Coldingham Branch (See Appendix 1).

#### 2. Background

- 2.1. Eyemouth Medical Practice provides General Medical Services in Eyemouth and in a Branch Surgery in Coldingham. The Coldingham Branch Surgery offers a dispensing service from the branch surgery.
- 2.2. There are no patients who are registered at Coldingham surgery as this operates only as a branch surgery site from Eyemouth. The Coldingham dispensary has an eligible population of approximately 2,200 patients who are entitled to use the dispensing service. Information shows that approximately 500 patients use the service each month with an average number of items dispensed of approximately 3,000 / month.
- 2.3. In 2017, Eyemouth Medical Practice worked with NHS Borders to cease services at the Practice's former Cockburnspath Branch Surgery for sustainability and safety reasons.

#### 3. Assessment

- 3.1. Following detailed discussions with the Partnership, it has become apparent that despite the significant efforts the Partners have made over a number of years to sustain the Coldingham Branch, there remain significant ongoing concerns:
  - A high level of pressure being placed on the Eyemouth Medical Practice team to maintain the Branch Surgery and Dispensing Service in the context of a need to cover key areas such as annual leave and multiple sites. This has in turn had a significant impact on the Practice's ability to retain and recruit staff. If this is not addressed, then this will make future recruitment and the ongoing sustainability of Eyemouth Medical Practice increasingly challenging.
  - There is a national shortage of GPs and this has made it increasingly challenging for the Practice to recruit GPs when former GPs have retired from the Practice. Eyemouth Medical Practice have diversified their workforce to continue to provide sufficient cover for the Practice's patients, but there have been significant challenges recruiting and

retaining staff as there have been poor recruitment prospects for both the dispensing and clinical teams.

- There are difficulties in ensuring appropriate governance and supervision of the dispensing service with a reduced number of GP Partner sessions resulting in increased patient dissatisfaction and dispensing errors.
- The Coldingham Branch Surgery is unable to offer a full range of clinical intervention to patients as the facilities there are limited. Therefore, if patients need a procedure or investigation then they have always had to travel to Eyemouth for a second appointment to complete an episode of care.
- The Coldingham Branch Surgery is not fit for modern General Practice and is also unable to offer a full range of clinical intervention to patients as the facilities there are limited. In addition, staff have to work alone when in the branch, and there is no chaperone service for patients in the Coldingham Branch.

3.2. A Short Life Working Group has been established with the aim of ensuring the safe and sustainable delivery of medical and pharmaceutical services that meets the needs of Scottish Borders Population in the area. In order to do this, the group will ensure that the medical and pharmaceutical needs of the population are met using a combination of reviewing the:

- current sustainability risks;
- current staffing levels;
- accessibility of alternative provision of Dispensing Services including the access to the closest dispensing branch; and
- alternative delivery models.

3.3. In addition, as part of the Communications and Engagement plan, all patients who are registered with Eyemouth Medical Practice have been sent a letter from NHS Borders outlining the situation and asking them to participate in a consultation. This consultation is open until 9<sup>th</sup> August and is inviting feedback on the impact should the Coldingham branch surgery close and dispensing services cease.

3.4. To date NHS Borders has received a good level of feedback from the consultation. Themes so far include:

- Transport – ability of individuals to use public transport, timings, cost, and distance from bus stops.
- Patient demographics – Coldingham generally has an older population.
- Availability of appointments at Eyemouth.
- Ability of Eyemouth pharmacy to manage additional workload.
- Parking and impact to local residents around the Eyemouth surgery.
- Feedback on practice management.

- 3.5. The Short Life Working Group (SLWG) will consider the feedback received from the public consultation and whether any action can be taken to address concerns. A Health Inequalities Impact Assessment will also be undertaken.
- 3.6. An update paper will then be drafted for a future Board meeting that will make recommendations on the future provision of services in Coldingham Branch Surgery. In addition, the Short Life Working Group will ensure that GP Subcommittee and Area Pharmaceutical Committee, along with all other relevant stakeholders, are briefed on the situation and the process being undertaken.
- 3.7. Since receiving the initial notification from the Practice, there has been a further change in circumstances which poses an additional challenge to the current and future service provision. The dual role Phlebotomist and Dispenser has handed in their notice to take up an opportunity to undertake nurse training and will be leaving the practice on 3<sup>rd</sup> September. Mitigating actions are being explored to allow the service to continue whilst the public consultation and service review is completed to enable the SLWG to provide the Board with a recommendation on the future provision of services in Coldingham.

### **Regulations associated to the provision of dispensing services**

- 3.8. In contrast to Pharmaceutical Regulations<sup>1</sup> that outline that a Pharmacist may apply to be included in the pharmaceutical list for the provision of pharmaceutical services, or that a Pharmacist may give notice to withdraw their name from the pharmaceutical list to the NHS Board and their name will be removed; the process outlined that applies to General Practitioners is different. Paragraph 44 of “The National Health Service (General Medical Services Contracts) (Scotland) Regulations 2018”<sup>2</sup> notes that the onus is on the Health Board to authorise a General Practitioner Contractor to secure the provision of dispensing services if it is authorised or required to do so.
- 3.9. As a result, in the case of a General Practitioner Contractor noting concerns about the ongoing viability of their dispensing service, it is a decision for NHS Borders on whether to withdraw their requirement or authorisation of the Contractor to continue to provide a dispensing service.
- 3.10. This is in instances where the Health Board, is satisfied, after consultation with the Area Pharmaceutical Committee, by reason of:
  - (a) distance;
  - (b) inadequacy of means of communication; or
  - (c) other exceptional circumstances, that GP registered patients will have serious difficulty in obtaining from a pharmacist any drugs, medicines or appliances.

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<sup>1</sup> The National Health Service (Pharmaceutical Services) (Scotland) Regulations 1995. Available from: <https://www.legislation.gov.uk/uksi/1995/414/made>

<sup>2</sup> The National Health Service (General Medical Services Contracts) (Scotland) Regulations 2018. Available from: <https://www.legislation.gov.uk/ssi/2018/66/made>

### **Regulations associated to the closure of a Branch Surgery**

3.11. There are no provisions in GMS Regulations associated to the closure of a Branch Surgery. However the public involvement provisions outlined in CEL 4 (2010)<sup>3</sup> would apply:

“The public involvement process should be applied in a realistic, manageable and proportionate way to any service development or change, including those that are time limited (temporary) or trialled through a pilot initiative, which will have an impact on the way in which people access or use NHS services. The process should be applied to any proposed service change.”

### **Pharmaceutical Care Services Plan 2020/21**

3.12. The current Pharmaceutical Care Services Plan 2020/21<sup>4</sup> concludes that the current service provision is adequate for the population’s immediate needs. Within Berwickshire, there is currently pharmaceutical provision within 5 other locations, with the closest being in Eyemouth which is 3.6 miles away from the Coldingham Branch Surgery, accessible in 8 minutes by car or 17 minutes by public transport (bus).

Town	Community Pharmacies and Dispensing Practices	Distance from Coldingham	Travel time by car	Travel time by Public Transport
Coldingham	Dispensing Practice	-	-	
Eyemouth	GLM Romanes Pharmacy	3.6 miles	8m	17m
Chirnside	GLM Romanes Pharmacy	7.9 miles	16m	56m
Duns	GLM Romanes Pharmacy	13.7 miles	23m	34m
Coldstream	GLM Romanes Pharmacy	20.3 miles	36m	1h20m
Greenlaw	GLM Romanes Pharmacy	20.7 miles	25m	2h24m

Table 1 Berwickshire Pharmacy Provision

3.13. From an accessibility perspective, the closest pharmacy in Eyemouth has accessibility provisions including a hearing loop, wide door and aisle width (>800mm), a low counter height, suitable waiting area for wheelchairs and pushchairs and ramps and level access throughout.

Locality	Town	Community Pharmacies & Dispensing Practices	Hearing Loop	Door width 800mm or wider	Aisle width 800mm or wider	Counter Height between 750-800mm from floor	Suitable waiting area incl wheelchair/ Pushchair	Ramps & level access throughout	Automatic/ Semi automatic door open
Berwickshire	Chirnside	GLM Romanes Pharmacy	✓	✓	✓	✓	✓	✓	-
	Coldstream	GLM Romanes Pharmacy	✓	✓	✓	-	✓	✓	-
	Duns	GLM Romanes Pharmacy	✓	✓	✓	✓	✓	✓	-
	Eyemouth	GLM Romanes Pharmacy	✓	✓	✓	✓	✓	✓	-
	Greenlaw	GLM Romanes Pharmacy	-	✓	-	✓	-	-	-

Table 2 Accessibility of alternative dispensaries in Berwickshire

<sup>3</sup> Scottish Government. CEL 4 (2010). INFORMING, ENGAGING AND CONSULTING PEOPLE IN DEVELOPING HEALTH AND COMMUNITY CARE SERVICES. Available from: [https://www.sehd.scot.nhs.uk/mels/cel2010\\_04.pdf](https://www.sehd.scot.nhs.uk/mels/cel2010_04.pdf)

<sup>4</sup> NHS Borders Pharmaceutical Care Services Plan 2020/21. Available from: <http://www.nhsborders.scot.nhs.uk/media/712063/Appendix-2020-37-Pharmaceutical-Care-Services-Plan-2020-21.pdf>

3.14. In order to provide many of the additional services available to patients, community pharmacies must have a suitable environment that offers the patient the privacy expected of such services. The table below outlines the Confidential Services available in the surrounding Pharmacies.

Locality	Town	Community Pharmacies & Dispensing Practices	Privacy - Is a separate enclosed room available?	Sound proof & private	Located close to, or part of, main counter	And/or area screened from main retail area	Wheelchair accessible	Large enough for 2 people plus Pharmacist	Worktop /desk	Hand washing facilities
Berwickshire	Chirnside	GLM Romanes Pharmacy	✓	✓	✓	✓	✓	✓	✓	✓
	Coldstream	GLM Romanes Pharmacy	✓	✓	✓	✓	-	✓	✓	✓
	Duns	GLM Romanes Pharmacy	✓	✓	✓	✓	✓	✓	✓	✓
	Eyemouth	GLM Romanes Pharmacy	✓	✓	✓	✓	✓	✓	✓	✓
	Greenlaw	GLM Romanes Pharmacy	-	-	-	-	-	-	-	-

Table 3 Confidential Services available in alternative dispensaries in Berwickshire

3.15. In addition, there are around 82 patients living in the north of the Berwickshire area registered to Eyemouth Medical Practice who will have closer access to Pharmacies in Dunbar (East Lothian).

3.16. The Area Pharmaceutical Committee have been briefed on the situation and have been asked to consider the potential impact of ceasing dispensing services at Coldingham may have on the current Pharmaceutical Care Services Plan.

## 4. Recommendations

The NHS Borders Non Executive Directors are asked to note:

- 4.1. The current situation relating to the sustainability concerns of the Coldingham Branch Surgery.
- 4.2. That a Short Life Working Group has been established with the aim of ensuring the safe and sustainable delivery of medical and pharmaceutical service that meets the needs of Scottish Borders Population in the area. In order to do this, we will ensure that the medical and pharmaceutical needs of the population are met using a combination of reviewing the:
  - accessibility of alternative provision of Dispensing Services including the access to the closest dispensing branch;
  - current sustainability risks;
  - current staffing levels; and
  - alternative delivery models.
- 4.3. That a Communications and Engagement Plan has been developed. As part of this, all patients registered with Eyemouth Medical Practice have been sent a letter from NHS Borders outlining the situation and asking them to participate in a public consultation. This public consultation is open until 9<sup>th</sup> August. Feedback received will be considered as part of the review of the situation that will be undertaken by the Short Life Working Group.
- 4.4. That an update paper will be drafted for a future Board meeting that will make recommendations on the future provision of services in Coldingham Branch Surgery

5. That the Short Life Working Group will work to ensure that all relevant stakeholders are briefed appropriately on the situation and process.

## **Appendix 1**

- Eyemouth Medical Practice letter to NHS Borders – 8<sup>th</sup> June 2021