

Emailed to all Pharmacies in NENC

Pemberton House

Colima Avenue
Sunderland
SR5 3XB

27th August 2026

Email: nencicb-tv.pharmacyandoptometry@nhs.net

NENC ICB reviewing Suspicious Pharmacy Nominations Changes

In recent months, the ICB has received concerns from Local Pharmaceutical Committee (LPC) representatives and pharmacy contractors about Electronic Prescription Service (EPS) pharmacy nominations being changed without the patient's consent. There is growing concern that this practice (sometimes referred to as "Nomination Theft") can create significant confusion for patients, additional workload for GP and pharmacy teams and potentially unnecessary clinical risk.

The relevant Terms of Service relating to EPS nomination clearly state the importance of Patient Choice when selecting a nominated pharmacy and highlight the requirements within the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013 to obtain explicit patient consent.

Terms of Service

The Terms of Service provide that a pharmacy owner must, if requested by a patient, nominate that patient in the NHS Patient Demographics Service (PDS) (paragraph 11 of Schedule 4 of the NHS (Pharmaceutical and Local Pharmaceutical Services) Regulations 2013, a process that you will all be familiar with. Patient choice of nominated pharmacy underpins this requirement.

For example:

- Patients must be able to change their nomination without recourse to, or permission from, the currently nominated pharmacy
- Pharmacy owners or others must not automatically nominate patients or reverse patient nominations (automatically re-nominate patients), i.e. do so without patient consent.

The ICB takes concerns relating to the experience and safety of patients very seriously and will undertake investigations including review of relevant nomination reports and obtaining assurance from contractors that appropriate procedures are in place. Any contractual and/or regulatory breaches will be addressed in accordance with the Performance Management procedures of the Pharmacy Manual were appropriate.

Where contractors become aware of nominations that are potentially not informed by patient choice, national guidance for EPS nomination concerns resolution is in 3 stages

- **Step 1:** Attempt local resolution (GP ↔ pharmacy / pharmacy ↔ pharmacy)
- **Step 2:** Engage LPC/LMC where appropriate
- **Step 3:** Escalate to ICB if unresolved

To support Step3, the ICB, in conjunction with NENC LPCs, is exploring how practices, pharmacy contractors and patients are able to communicate their concerns relating to nomination changes. In the meantime, contractors can contact the ICB by emailing nencicb-tv.pharmacyandoptometry@nhs.net, and patients should contact nencicb.complaints@nhs.net or phone 0191 374 4218.

To support contractors, the steps below set out a summary of accepted good practice for nomination changes:

- Make sure all staff know that changing a nomination must be done with the patient's informed consent
- Always record evidence of patient consent when changing nominations, for each and every change to a nomination
- Patients must make their own choice of nominated pharmacy without any pressure or incentives
- Report any suspected unauthorised changes promptly to protect both patients and the EPS system
- Information suggesting unethical nomination practices may be escalated to the GPhC as potential misconduct.

“Patients must be fully informed about EPS before their nomination is set up and any changes to nominations must only be done at the request of the patient and an audit trail of the request is strongly advised.”

Community Pharmacy England (CPE) have developed 4 guiding principles in relation to patient nominations in which all pharmacy teams should understand and adhere to protect patient choice. These are as follows:

- Plan how EPS works
- Don't influence the patient
- Update nomination details as soon as possible
- Create a standard operating procedure.

Please ensure that all members of staff are aware of the above and the consequences of switching nominations without a patient's consent.

Further guidance on the above principles can be found by following the links below:

- We're all community pharmacy ([Homepage - Community Pharmacy England](#))
- Nomination:
 - [The four guiding principles of patient nominationelectronic-prescription-service/eps-nomination-standards-that-must-be-followed](#)

The North East and North Cumbria ICB looks forward to working closely with partners and providers to ensure that community pharmacies continue to play their part in delivering high-quality services and advice to all patients.

Yours sincerely

A large black rectangular redaction box covering the signature of Martin Short.

Martin Short
Director of Commissioning Newcastle Gateshead Neighbourhood and GPOD